

30th January 2015

Your Ref:



BY POST & E-MAIL

Airports Commission Consultation
Freepost RTKX-USUC-CXAS
PO Box 1492
Woking
GU22 2QR

Dear Sirs

Response to Consultation Questions

I have had difficulty in responding to the categorised and prescriptive questions in your document.

However, I have done my best to allocate my concerns and comments appropriately. But please address my issues as they stand and not disregard them if they do not strictly fall within the parameters of the question.

Being a resident that will be affected by Gatwick expansion, my comments primarily address the Gatwick option.

However, in my career as a Chartered Surveyor/Cost Consultant, I have worked on projects at both Gatwick and Heathrow and know both reasonably well.

Q1: What conclusions, if any, do you draw in respect of the three short-listed options?

From the documentation, I fail to see the overarching reason why Luton and/or Stansted airports were eliminated from the current consultation. Your chronology in Box 3d of the December 2013 interim report identified that:

- i) Stansted was promoted in 1963, 1967 and 2003
- ii) Gatwick 2nd runway was positively ruled out in 2010

My conclusion is that, being in a predominantly rural area, the expansion of Gatwick will have a far greater proportional detrimental impact relative to its location and surrounding areas than the Heathrow options.

Q2: Do you have any suggestions for how the short-listed options could be improved?

I have no suggestions of material significance.

Q3: Do you have any comments on how the Commission has carried out its appraisal?

You will understand that, in 2½ month consultation period, (and that over the Christmas period), no meaningful comment can be made on a document that is the result of nearly 2 years work and an unimaginable man-hour input by the Commission and airport proposers.

Q4: In your view, are there any relevant factors that have not been fully addressed by the Commission to date?

Has the commission prepared any data and factored in the number/percentage of passengers that are prepared to travel airports further away? I myself, a resident of Dorking, have used Stansted in preference to Gatwick. And other members of my family, resident in Barrow in Furness, have recently used Birmingham in preference to Manchester. There must be a measurable degree of this type of passenger movement.

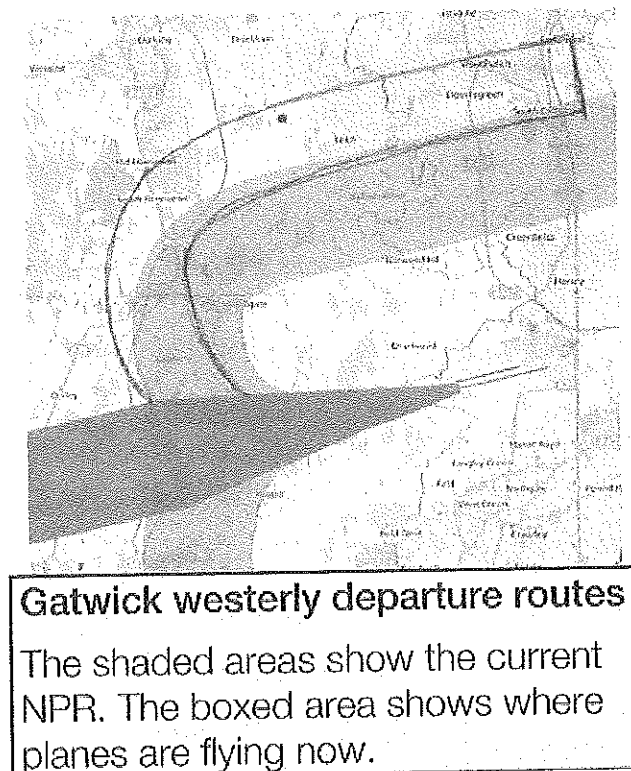
There is very little reference in the consultation of the effect that increased ATMs will have on flightpaths. In fact, a word search found only one occasion of the word 'flightpath', (in the Heathrow section). It appears to have been neglected in the Gatwick section.

Currently Gatwick's two terminals run at 75% capacity (33mppa against a stated capacity of 45mppa).

Interpolation of the figures in GAL's Master Plan 2012, suggest that, with the 3rd terminal, ATMs will reach some 437,000 and that assumes current 75% capacity.

There has recently been strong local opposition and challenges to dubious claims and statistics presented by GAL to a change that they have made to their current Noise Preferential Routes (NPRs) and Standard Instrument Departure Routes (SIDs). The CAA are currently reviewing their temporary approval of the routes.

The Consultation Document appears not to fully address the noise pollution that will be generated over previously unaffected areas, nor the increased noise under pre-2013 flightpaths – the following map shows only those departure routes affecting my locality. Similar maps have been made for southern and eastern areas around Gatwick:



The calculation of L_{Aeq} contours (9.2 in the Business Case and Sustainability Assessment), can be influenced by the criteria used in their calculation. GAL have declined to respond to my requests for criteria they used to calculate their noise contours and revised departure routes. Nor have they justified their narrow definition of “overflowed” when claiming to comply with Government guidelines. It is primarily the distance of the aircraft, not necessarily their being overhead, that creates the noise nuisance.

Do not underestimate the true extent of the environmental impact in both pollution and loss of amenity to our Area of Outstanding Natural Beauty and tranquil areas around Gatwick.

Gatwick is served by:

- i) One railway line (which is at capacity and will require some form of undisclosed upgrading)
- ii) Two coach services to London (the city the airport is supposed to serve). Once north of the M25, the A23 and other into London are slow, fragmented, urban roads (unlike the M4 from Heathrow to central London). Putting on additional coaches will only further congest already busy routes.
- iii) A number of bus routes to local towns. (Perhaps useful to a limited number of holiday passengers).
- iv) The M23 – the only road artery into Gatwick. It will be principally fed by the M25. It only takes one minor hiccup to bring the M25 to a standstill, as the local radio traffic bulletins will verify.

The rail connection upgrade may be feasible. (But at what cost?) Little can be done to improve coach journey times into London (after leaving the motorways). The local bus routes have little significance (who wants to use a bus with a load of baggage – they will arrive by car or taxi). The M23 will become congested and slow.

GAL suggest they will phase the works. This will create a major, semi-permanent building site, with all the attendant construction traffic and site accommodation. At Heathrow there was so much ongoing work, I used to joke that Heathrow's purpose was to boost the construction industry and fly planes in and out to finance it! But Heathrow had ample adjacent space around it to erect complex construction accommodation, parking and a viable road system for site traffic. Gatwick has none of these. Continuous major construction will blight the communities around the airport for years.

Q5: Do you have any comments on how the Commission has carried out its appraisal of specific topics?

My response to Q3 also applies here, although I have addressed some topics in Q6.

Q6: Do you have any comments on the Commission's sustainability assessments, including methodology and results?

Section 15.1 – The Commission states *"This is the first time an integrated Quality of Life analysis has been undertaken with respect to airport development"*. I am not sure that I want a major, disruptive and far reaching development, to be a guinea pig for this type of analysis.

Have the Commission prioritised and 'weighted' the data in respect of its accuracy, pertinence and efficacy, prior to reaching your assessments and conclusions? E.g. Is the creation of 'x' number of jobs of greater or lesser worth than the loss of 'x' number of homes etc?

15.3 – I do not think that the national impact should play any realistic part in the assessment. I do not wake up each morning and think what a wonderful benefit the nuclear submarine facility at Barrow-in-Furness bestows on me, even though several family members work or have worked there. And I have never been approached by The Office for National Statistics for their Annual population Survey.

15.4 - Nor have I (or many of my friends and neighbours) contributed to "Mappiness", simply because we do not have iPhones. To rely on data derived from the sort of people who buy iPhones, in my opinion, skews the evaluation. And then to apply that questionable data to noise contours (which I have stated earlier can produce different results depending on the criteria used), would seem to deliver conclusions of negligible worth.

15.5 *'Living near an airport'* – Those who live near an airport have chosen to do so for any number of socio-economic reasons. My sister and family are tolerant of aircraft noise because they chose to live in Horley, close to the Gatwick runway. A major factor in their choice was that the house prices reflected the location. When my wife and I chose to live just outside Dorking, we did not even consider anywhere closer to Gatwick. I think the Commission would experience a completely different response if a survey were taken of people who suffered aircraft noise, when they previously had none plus those who suffered an appreciable increase in noise.

15.5 *'Being at an airport'* – I do not see what substantial purpose this analysis has on the overall appraisal.

15.5 *'Living in a daytime aircraft noise contour (over 55 dB)'* – 55dB is an arbitrary high noise level. I and my neighbours are suffering noise below this level and experiencing reduced wellbeing.

15.5 *'Living in a night time aircraft noise contour was not associated with any effect on subjective wellbeing'* – I do not believe this. If it is the case, why cannot runway capacity be increased by lifting the ban on night flights at Heathrow? Again, the devil is in the detail. Night flights at Gatwick are defined as those departures/arrivals between 22:30 and 06:00. I have been woken by aircraft at 06:30 and a quiet evening disturbed by aircraft at 21:30.

The Commission in para 3.38 concludes that *"'bundled' impact is likely to be broadly neutral"* (sic). I think you will be proved wrong if Gatwick goes ahead. I have commented on road infrastructure and jobs in Q7.

The national assessments in section 15 cannot be denied, but are only true in a very tenuous, extended, cause and effect way and could be applied in equal measure to both the Heathrow and Gatwick proposals.

Q7: Do you have any comments on the Commission's business cases, including methodology and results?

I have not had sufficient time to gather adequate background information to investigate all of the statements.

Without a more detailed breakdown of the GAL Capex, it is difficult to comment on the costs.

Knowing the way investors operate, the works will inevitably be phased to ease the funding requirements. Is there an uplift shown in the Capex for phased construction?

The scope of the proposed surface transport works I suggest are woefully inadequate, addressing only the M23 and roads in the vicinity of the airport.

The M23 is the principal road access for all but local users of the airport. Traffic feeding on to the M23 from the surrounding areas will increase and put pressure on already overcrowded semi-rural roads. Much of the traffic for the M23 will feed from the M25, a motorway already prone to long queues (despite the recent improvements). On the feeder A and B roads to the M23 and M25, queues already form with the 'school run' in the mornings and evenings. Country lanes are now being used as "rat-runs" to avoid the A24, A25 and associate routes.

It is inevitable that further significant infrastructure works will be necessary.

We know that Gatwick is prone to flooding and disposal of the additional run-off from buildings and hard surfacings will require more than local tinkering with the drains.

In my experience, projects of this size are prone to 'scope creep', for reasons of *'we never thought of that'* or *'while we're here we may as well do this'*.

Moreover, the Construction Contract will inevitably be a form of Construction Management or Management Contract. There will be cost uncertainty by the nature of a 'detail the design as you go' build process. Pressures to get packages awarded lead to lapses in co-ordination and inappropriate package tendering methods.

Does the Capex include sufficient contingency funds – for scope creep, identifiable risks and pure continent risk?

At a public meeting before Christmas, Crawley Councillor Brenda Smith advised that unemployment in the area was minimal and vacancies were available that all but cancelled it out. Therefore, GAL's claim to create 120,000 new jobs (stated on their website) will have to be met by:

- i) A significant (75,000+ units) programme of house building (presumably not costed in the Capex). Given that the entire UK house building effort at the end of 2014 comprised 30,000 – 35,000 starts, 75,000 units is impossibly optimistic. And what of the effect on schools, doctors surgeries and other local services? Are all these costed in the Capex?
- ii) Large numbers of personnel commuting in from a sizeable extended catchment area which, together with all the additional air passengers, will put a massive burden on a semi-rural transport infrastructure, out to a much greater radius around the airport than GAL have proposed to upgrade.

That Gatwick may grow to airport the size of Atlanta, an airport deep inland, is a dreadful concept for Surrey, East Sussex and Kent, given the geographical constraints.

I cannot deny that a blanket of sheds for storage, maintenance and all the other activities serving a large airport, may create more income than pubs, tea rooms and the like, but there is more to enjoyment of life than pure income.

Q8: Do you have any other comments?

a) The Commission has amassed a large quantity of data to reach its assessments and conclusions. I think there is a danger of 'information overload' obscuring the broader issues.

The Heathrow Extended Northern Runway proposal:

- i) Represents a smaller proportional enlargement of the airport than that of the Gatwick proposal.
- ii) Will, (notwithstanding the loss of an area of lower-grade green belt), in effect, be built in a suburb of London and an environment already occupied by a substantial amount of service, commercial and industrial buildings.
- iii) Represents a smaller proportional increase to ATMs than that of the Gatwick proposal.
- iv) Is already well served by rail, tube, bus and coach routes, as well as the M4 (into central London and out to the west) plus the M25 (to the south and north).
- v) Is preferred by the major airlines – including recently, Easy Jet.
- vi) Has more population close by, or within easy commuting distance, to fill the additional jobs required.

The Gatwick proposal:

- i) Will proportionally enlarge the airport by a greater extent than that of Heathrow.
- ii) Will detrimentally impact the environment of the Surrey Hills, Areas of Outstanding Natural Beauty and tranquil areas (as indeed the revised flightpaths are already doing), through increased road usage and inherent creation of commercial/light industrial buildings serving the airport. Gatwick is not in a suburb – it is an airport in beautiful countryside, alongside a predominantly residential town.
- iii) If a sensible definition of ‘overflown’ is used, will introduce noise pollution to populations previously unaffected and disproportionately increase the same to populations already affected by noise to a lesser degree.
- iv) Will burden local services and clog up the transport infrastructure with the (promised) additional jobs.
- v) Is served by limited public transport, which will require major upgrading – if indeed possible and a motorway at the mercy of the M25 and all its problems.
- vi) If you take the UK as Gatwick’s catchment area, its location south of the major cities and conurbations, suggests a fair number of people will have to travel past a neutered Heathrow to reach it. How sensible is that?
- vii) To phase the works will create a major, semi-permanent building site and blight the area for years.
- viii) On paper may be the cheapest option, but the scope and figures are suspect. Cheapest is not always the best in the long run.

b) Heathrow is owned by Ferrovial, a service company, employing over 60,000 people and has been around since 1952. It also owns Aberdeen, Glasgow and Southampton airports, along with companies involved in construction, water treatment, urban & industrial waste and toll road management. As a company it identifies a service need, builds it and generates a profit from a varied portfolio.

Gatwick on the other hand, was purchased by a Global Infrastructure Partners, an investment company, who created a company (Ivy Holdco Limited), who then created a wholly owned subsidiary - Gatwick Airport Limited. Ivy Holdco Limited is controlled by Global Infrastructure Partners and four other non-UK investors. Their principle aim is to “achieve superior risk-adjusted returns” (sic) and maximise the returns for two sovereign wealth funds and two pension funds, all outside the UK.

I have e-mailed with both airports and additionally written to Gatwick regarding aircraft noise.

Heathrow on each occasion responded with links to their website, attachments explaining the aircraft movements and a phone number if I wanted to talk about the issues in more detail.

I got no acknowledgement of my e-mails from Gatwick. I have had four replies to recorded delivery letters, none of which responded to the matters I raised, two being standardised, patronising, round-robin letters and one basically saying I can write all I like, but it will change nothing.

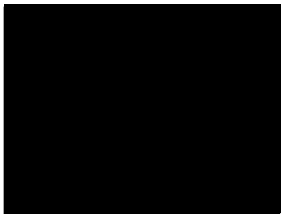
I know which organisation I would be more comfortable working with.

Finally, regarding the consultation, I am fairly used to this sort of thing, but found researching the documents time consuming, requiring a degree of application and mental agility and the exercise raised many questions for me.

Frankly, I do fear not all those opposed to Gatwick expansion have the wherewithal to undertake this exercise and would be defeated by the task.

But be in no doubt, within an extended radius around the airport, there is a massive majority opposed to Gatwick expansion.

Yours faithfully



cc Sir Paul Beresford MP