

1. WHAT CONCLUSIONS, IF ANY, DO YOU DRAW IN RESPECT OF THE 3 SHORT-LISTED OPTIONS? Please note that for ease of reference the Phase 2 objectives defined by the Commission are shown in bold text below:

-maximise benefits in line with relevant long-terms strategies for economic and spatial development - cargo- only LHR options would bring freight solutions and ensuing wider economic benefit.... **(what is LHR estimated freight £ case?)** (Gatwick proposal focus on low-cost passenger growth) surface access limitations and other other infrastructure considerations - LHR options would provide biggest benefits in terms of economy, jobs and national connectivity of the 3 options presented. Heathrow provides for better connectivity to rest of UK via rail and road.

2) BUSINESS CASE

Economic benefit - Gatwick economic benefit predicted to be only a maximum of less than 50% of (LHR NW Runway project £112 - 211 bn, LHR Northern Runway - £101-214 bn whilst Gatwick only £42bn -127bn best case and mostly deliverable after 2050) The Heathrow options offer greater cargo opportunities, which provide for significant export benefits to the economy (jobs and GDP).

Further the significant negative impact on the local and surrounding economy of reduced tourism to the area due to a change in the character of the area (see environmental impact below) has not been considered here.

Economic benefit assessment also does not include the fact that Gatwick currently does not pay corporation tax! This needs to be factored into any equation!

Employment - unemployment levels in area surrounding Gatwick are below 2%. Therefore new employees will be coming from outside the area affected (likely by train from South London). Therefore the areas around Gatwick would suffer all the pain and get none of the gain. (contrary to your point 3.38). Heathrow options offer more jobs (179,000 by 2050 vs only 49,0000 at Gatwick) including 64,600 outside London and South East (compared to only 24,500 at Gatwick). No cargo related job opportunities. Heathrow jobs created in wider catchment area, allowing commuting from wider area and therefore providing increased employment opportunities without impact on local infrastructure, due to greater ability to commute using the already planned improved rail networks.

Financing uncertainty atGatwick

Surface Access Intervention Costs -

3) SURFACE ACCESS

Gatwick surface access proposals make no mention of M25 problems. Even if M23 improvements are made, traffic would still be stuck on M25 in either direction.

a) maximise number of passengers and workforce accessing the airport via sustainable modes of transport

Gatwick area local trains already over capacity, particularly at peak commuting times. Brighton line improvements are being done due to normal demand and do not encompass any proposed changes at LGW. No viable rail proposal from Gatwick, particularly at peak commuter times, particularly for passengers with luggage. As seen under Employment comment above, all new workers would have to travel into the Gatwick area, as there is no locally available workforce. Where is the assessment of the rail/road impact of large numbers of employees travelling to Gatwick from South /central London?

b) Accommodate the needs of other users of transport networks, such as commuters, inter city travellers and freight

- M25 users would be negatively impacted as no changes in m25 are proposed - even with new additional lane, the M25 around Gatwick is already over capacity

- rail commuters are already badly served with over-crowded trains on the Brighton line. The additional burden from a new runway at Gatwick with immense numbers of passengers is not being catered for in any future scenario from Gatwick. Conversely, commuters and inter city travellers will be better served at LHR by improvements to the M25 and M4, cross rail and any new rail hub station.

- freight - no real freight option at LGW

- Heathrow Northern Runway proposal -M4/airport spur and improvements to M25 would greatly benefit the wider and local communities,

c) To enable access to the airport from a wide catchment area - Geographic location means only really serves S E England. Would not address enhancing status of LHR as international long-haul hub competing with other European rivals. LHR would be much easier to access with the new rail and road proposals and its status as a hub

Positive outcomes from local community and local economy from surface access changes. - the proposed positive road changes at Gatwick are minimal (and indeed completely insufficient to support the proposals). M25 would be negatively impacted therefore the Gatwick proposal does not meet this objective.

Whereas, the Heathrow option Northern Runway Proposal would provide a much needed spur from the M4 to LHR (and other motorway improvements) and thereby greatly improve a known M25 bottleneck, creating a positive impact for the SE as a whole and the wider community. In addition the further improvements to the rail links (many already planned and underway) would mean Heathrow is a commutable workplace for many outside the traditional Heathrow employment catchment area, meaning that infrastructure impact (schools, housing etc) would be of lower than suggested in the Commission Report. Employment would therefore be promoted in a wider area.

II) ENVIRONMENTAL ASSESSMENTS

quality of life - "to maintain and where possible improve the quality of life for local residents and the wider population"

The area surrounding Gatwick is largely an Area of Outstanding Natural Beauty (AONB) and area of tranquility, being largely rural. A second runway at Gatwick with the proposed numbers of flights would mean that in addition to the recent changes in use of airspace undertaken by Gatwick, there would be DOUBLE the effect of the impact of these, completely detrimentally changing the character of this area beyond recognition (largely due to impact of noise). The marginal impact of these changes would immense.

By comparison, the the area surrounding Heathrow is already suburban or urban, already with a background noise. the NW runway option for LHR would actually reduce reduce the night noise vs the status quo (3.137) . Whilst there would be perhaps an impact caused by a new runway at LHR, the character of the areas impacted would not be changed overall, compared to Gatwick.

It is vital to note that Gatwick currently has no night time flight ban and operates as a 24 hour airport. Heathrow, by comparison does have night flight restrictions. Thus the negative impact on residents affected by expansion at Gatwick would be profound and would impact not just quality of life but also the health and well-being as a whole. This is a major differentiator between the proposals!

Given these comments on employment, infrastructure and environment above, the Gatwick proposal means that its local and surrounding communities would suffer the negative consequences without any upside.

People

contrary to point 3.45 - there is very little local support for the Gatwick proposal. There is a significant opposition from local communities, particularly outside the 5km zone around Gatwick itself.

Place

Environment

a) NOISE - to minimise and where possible reduce noise impacts

-“...there are areas around Gatwick that are rural and have high levels of tranquillity that would be adversely impacted by new development at the airport..”. The main areas affected by the arrivals routes (the most affected by noise impact) are rural areas, as well as the town of Tunbridge Wells. They are also areas of AONB and with significant heritage assets. All of these are already becoming adversely affected by changes in use of the airspace by LGW. The impact of these would be doubled by a second runway and would create a noise environment similar to living in a major urban environment. The noise would

- as you note your noise scenarios show a doubling or even tripling of those affected by noise. The marginal impact of the noise in an area of tranquillity would be felt all the more.

- night flights - your point 2.75 highlights the health and well-being concerns caused by sleep disturbance. Currently Gatwick is a 24 hour airport, therefore the residents around Gatwick would suffer immensely more compared to Heathrow residents were a Heathrow scheme be selected.

-Heathrow NW Runway would reduce night noise and reduce the number of people affected by noise (3.137 and 3.138)

b) minimise impact on existing landscape character and heritage assets -

-“...there are areas around Gatwick that are rural and have high levels of tranquillity that would be adversely impacted by new development at the airport..”. The main areas affected by the arrivals routes (the most affected by noise impact) are largely areas of AONB and have significant heritage assets. All of these are already becoming adversely affected by changes in use of the airspace by LGW. The impact of these would be doubled by a second runway and would completely change the landscape character.

By way of example, in summer 2014 Haver Castle had to cancel its popular series of outdoor theatre events, due to the inability of the audience to hear the plays due to aircraft noise. All such future events would be impossible at Haver or other heritage sites (e.g. Penshurst Place, Groombridge Place, Wakehurst Place, Sheffield Park, Ashdown Forest to name but a few). People would not travel to enjoy these areas if the tranquillity and thereby character of these areas has been destroyed.

By comparison the Heathrow options would not completely change the character of the areas affected, being already urban and sub-urban in character.

In your point 2.76 you note that the value of heritage sites, their historical importance and how they shape and define the areas in which people live. It cannot be underestimated the impact of a further expansion at Gatwick would have on the character and shape of the local environment.

your point 3.35

“...Expansion would have a negative impact on a range of other local environmental factors, including air quality, landscape, heritage, biodiversity and water. the impacts in some cases will never be entirely mitigated.”

All the environmental factors mentioned above would forever change as a result of Gatwick expansion. The negative impact on the environment would be irreversible and would also negatively impact the local economy.

III) OPERATIONAL VIABILITY

no comment

IV) COMMERCIAL VIABILITY

Gatwick's commercial viability is too far in the future - I would question how a business case with the main economic benefit accruing first in 2050 is commercially viable? No business plan in the business world would ever be approved on this basis. All negative impact would occur immediately (and prior to any proposed sale of Gatwick in 2019) and any likely benefit to the wider national interest would not happen till 2050.

Financing uncertainty at Gatwick- per comment 3.42. How viable is this?

Gatwick has stated goal to sell the company in 2019. how would this affect the proposal, deliverables etc? How would any purchaser be obligated to fulfil any objectives?

V) TECHNICAL VIABILITY

no comment

1. WHAT CONCLUSIONS, IF ANY, DO YOU DRAW IN RESPECT OF THE 3 SHORT-LISTED OPTIONS? Please note that for ease of reference the Phase 2 objectives defined by the Commission are shown in bold text below:

STRATEGIC FIT

Provide additional capacity that facilitates connectivity in line with assessment of need / – Gatwick is too close to Heathrow to make it a viable second international hub.

For passengers:

Infrastructure to / from Gatwick by road will be compounded by no planned improvements to access Gatwick to the M25 and M23, J7 of the M25 is a constant source of travel delays during peak hours, and busy during off-peak hours; one train line connecting Gatwick to London and the South-East provides no viable alternative. The services provided by Southern and First Capital Connect are already over capacity and have not experienced the level of investment required – and nor will they for a significant period of time according to Future Railway – to increase capacity to meet estimated demand from increased numbers of passengers resulting from a second runway at Gatwick.

There is no planned direct rail connection between Heathrow and Gatwick.

Maximise benefits in line with relevant long-terms strategies for economic and spatial development

For freight:

Infrastructure at Heathrow has been purpose built to meet air freight traffic, with significant investment by international carriers in distribution etc. Replicating this type of international freight distribution infrastructure at Gatwick would not make commercial sense given that it is 36 miles by road between Gatwick and Heathrow Airports, so there is no business case.

Gatwick would only serve the South / East for passengers, not freight, as, as it is not an established international hub, most passenger and freight would continue to fly via Heathrow. So, a failure to invest in

Heathrow would see our one international hub fail to compete with its rivals, Schiphol and Paris, which could result in a deterioration of passenger and freight traffic.

The Heathrow Northern Runway option's key strength (3.68) is its wide network of connections, both long and short-haul.

Improve experience of passengers and other users of aviation

LHR options would provide easier connections via sustainable transport from West and North than LGW. Heathrow is already well served through the purpose built high speed Heathrow Express, London Underground, national rail services and links to the M25.

Maximise benefits in line with relevant long-terms strategies for economic and spatial development - cargo-only LHR options would bring freight solutions and ensuing wider economic benefit.... (Gatwick proposal focus on low-cost passenger growth) surface access limitations and other infrastructure considerations: LHR options would provide biggest benefits in terms of economy, jobs and national connectivity of the 3 options presented. Heathrow provides for better connectivity to rest of UK via rail and road.

2. DO YOU HAVE ANY SUGGESTIONS FOR HOW THE SHORT-LISTED OPTIONS COULD BE IMPROVED .i.e. their benefits enhanced or negative impacts mitigated?

- a. **DISPERSAL OF FLIGHT PATHS** not concentration using PBN technology: use PBN technology to manage wider flight paths that prevent concentration of aircraft and noise over a narrow path, so that the noise pollution is shared and more intermittent, as opposed to constant and unrelenting
- b. **CDA (Continuous Descent Approach):** smooth flights for arrivals to reduce noise
- c. **NOISE LEGISLATION:**
 - i. **A minimum altitude on aircraft at all times**, including fines and bans for airlines and airports who break the law through noise violation
 - ii. **Aircraft modification to reduce noise:** all Airbus 318,319 and 320 aircraft, and those with a similar airframe, which traverse UK airspace or frequent UK airports, are retrospectively fitted with a modification to reduce FOTT cavities and similar aircraft noise. Fines and bans for those airlines who fail to meet these requirements
We have legislation for speeding, noise and environmental pollution by road vehicles, the same type of legislation should be introduced for air traffic.
- d. **NO NIGHT FLIGHTS** arriving or departing from UK airports between 23:00 to 06:00hrs, 7 days a week.
- e. **RESPITE:** introduce a policy that offers maximum respite for all communities and individuals affected, and is based upon geography rather than size of population. This should include:
 - i. provision of a programme of planned rolling respite for all impacted communities
 - ii. abandon the current policy which unfairly targets rural areas, areas of tranquillity and areas of low-density population by concentrating flight paths over them
- f. **NOISE MEASUREMENT, ENFORCEMENT AND CONSULTATION**
 - i. greater public involvement in all stages of selection of inbound and outbound flight routes as part of any changes arising from London Airspace Consultation
 - ii. revision of terms of reference and management of Airport Consultative Committees to make them independent, representative, transparent and effective
 - iii. establish an Independent Authority, one which is not resourced from industry, to oversee the management and delivery of Noise Action Plans and Airport Master Plans, with effective powers of enforcement, including fines and bans
 - iv. adopt noise measurement standard to replace noise averaging (as represented by current use of the 57dB LAeq yardstick), so as to better reflect actual impact of individual noise events. The assessment of impact would be based upon the latest

technical opinion on Noise Disturbance and its correlation with health issues. This, along with the use of more meters, would make noise reduction more realistic

3. DO YOU HAVE ANY COMMENTS ON HOW THE COMMISSION HAS CARRIED OUT ITS APPRAISAL? (see section 2 of docs)

I welcome the Commission taking into consideration the quality of life impact of the options: this is an incredibly important point. I would also urge you to consider the marginal impact of such options.

In 3.52 the commission has reduced forecast of passenger numbers compared to Gatwick's proposed business case. The negative impact of Gatwick achieving its planned numbers (on all aspects of this study) would therefore be magnified.

Please note that the format and approach required to respond to the Commission's appraisal is completely beyond the scope of the "average person". Those not familiar with the material will struggle to wade through the number of pages and extract the relevant information for a proper response.

4. IN YOUR VIEW, ARE THERE ANY RELEVANT FACTORS THAT HAVE NOT BEEN FULLY ADDRESSED BY THE COMMISSION TO DATE?

- a. GATWICK'S stated goal of selling the company in 2019. What incentive would Gatwick have to fulfil obligations after this time? There should be an "equitable charge" introduced on any such sale, based on amount funded by Government and tax payers
- b. Gatwick's status as non-payer of corporation tax yet requiring government and tax payers funding to fund its own expected profits in its bid, whilst any "projected" GDP revenue to accrue to tax payers only in 2050 and beyond. There should be no expansion at Gatwick prior to payment of full Corporation Tax
- c. Thames estuary airport: have private finance initiatives (similar to Eurotunnel) been properly investigated to make this a viable alternative? Many new international airports are now situated so that majority of aircraft movements are over water and therefore less disturbing to residents (see Hong Kong, Jeddah, Schiphol)
- d. Business cases could be significantly affected by major airlines' ability to change choice of hub. Even if an airline were to declare support for a particular solution now, any change to this over time would change the business case (see your point 3.17). No account should therefore be taken of any assumption of any major airline changing hub from LHR to LGW
- e. The negative impact on West Kent has been overlooked in your study. The focus has been on the areas immediately surrounding Gatwick. Kent residents are outside the employment and general benefit area for Gatwick, yet would suffer the majority of the negative environmental and quality of life changes from any Gatwick expansion due to the way that arriving aircraft would be streamed (westerly wind direction is the norm). Kent County Council as well as Tunbridge Wells Borough Councils have therefore rejected the Gatwick second runway proposal. The majority of the High Weald Parish councils have done likewise. Your assessment of Gatwick being awarded a second runway could not be considered complete unless a thorough assessment of the impacts on West Kent have been carried out and taken into consideration.
- f. There is no consideration of London Stansted as an alternative to London Heathrow or Gatwick: London Stansted would provide a well-located second international hub to London Heathrow with easy access to the Midlands, North and South East.

5. DO YOU HAVE ANY COMMENTS ON HOW THE COMMISSION HAS CARRIED OUT ITS APPRAISAL OF SPECIFIC TOPICS (as defined by the Commissions 16 appraisal modules), including methodology and results)

The charts in 3.31; 3.32 and 3.33 do not have labels on the axes and are hard to understand. They show numbers of those affected by noise but not the marginal impact of increased frequency of noise. Where data is presented for public consultation, it should be clear and easy to understand. I am not in a position to comment on these charts, which means that my response will not be as complete as it could be. I am sure that other respondents will have similar problems.

6. DO YOU HAVE ANY COMMENTS ON THE COMMISSIONS SUSTAINABILITY ASSESSMENTS, INCLUDING METHODOLOGY AND RESULTS?

Where is research on likely environmental and health impact of increase in aircraft flying below 7000 feet on our communities

Greater public involvement in all stages of inbound and outbound flight routes should be brought in as part of the changes arising from the London Airspace Consultation