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Dear Sir/Madam,

**Ref: Government Consultation on additional capacity in the South East**

Thank you for providing the opportunity to comment on the Airport Commissions three lead options proposed for additional runway capacity in the SE of England in 2030.

I am writing as a resident local to Gatwick Airport. As an airport user I fully support the Commissions view that the current approach of forcing even greater volumes of traffic through the UK's existing airport infrastructure is unsustainable. However, I object to a second runway at Gatwick, and the fact that this remains an option for additional capacity in the South East. That is because the Gatwick proposal fails to satisfy a significant number of the Commissions objectives when compared to the other two short listed runway options; either by lacking robust evidential support or, by drawing incorrect conclusions by failing to consider important aspects of Gatwick's infrastructure, airlines and local environment.

**I object to the proposal to expand Gatwick Airport by adding a second runway (LGW2R) as put forward by Gatwick Airport Ltd because:**

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

The Gatwick proposal fails to satisfy a significant number of the Commissions objectives and raises the following concerns:

- It does not align as well as the Heathrow options with local development and regional strategies and there is no evidence to substantiate if the surrounding 14 Local Authorities (LA's) could cope with the minimum of 18,400 homes the additional growth would require.
- The traffic assessment does not take account of the commuting traffic that the airport would create.
- It is significantly limited in the number of Code F (A380) aircraft that can operate into it relative to the other airport options.
- It provides minimum resilience to the London Airports systems relative to the Heathrow options as it will only be able to accept only a very limited number of Code F (A380) aircraft.
- The surface access changes proposed by Gatwick are insufficient and disproportionate to their growth forecast and reduce the egress and access resilience of the airport.
- The surface access changes proposed take no account of the Crawley Plan

- Gatwick is only served by a single rail and road connection and is already dangerously vulnerable to disruption.
- The rail proposal lacks strength and solidity causing crowding in the peak hours on the Brighton line; and hinges around the Brighton line providing passenger access to the airport on routes which are “slow” and provide poor passenger connectivity to London.
- Gatwick make the unfounded and unjustified assumption that they can increase the proportion of passengers using public transport.
- Even with no new runway, Network Rail forecast passengers on the Brighton main line will rise by almost a third in the decade to 2020. GAL rely on the improvements already committed to the Brighton Main Line linking Gatwick to London. Those improvements already in the pipeline are needed to accommodate existing growth forecast. There is no allowance for Gatwick expansion. Neither is there a simple, straightforward, or cost effective solution to adding capacity.
- In addition, the rail proposal requires further investment by 2040 but no future funding “source” has been identified for this.
- According to the Department for Transport, a new railway link would have to be built to serve an increased flight volume to and from Gatwick. There is no proposal or identified funding to do this.
- The resilience for the Gatwick road infrastructure is totally inadequate<sup>1</sup> with only one motorway (M23) and a limited number of major roads (A and B roads) around the airport, many of which are already congested. The cost of these infrastructure requirements should be entered into the equation, along with a viable plan to address the issues in a timescale commensurate with Gatwick expansion.
- It does not benefit the local community to the extent of the Heathrow options and the Gatwick solution only benefits a smaller number of people when compared to the two Heathrow options proposed for road and rail.
- The noise assessments which conclude that fewer people would be affected by Gatwick expansion than Heathrow are fundamentally flawed in the following respects:
  - i. They are based on LAeq contours. Although this measure and associated thresholds have been used since 1990 it is now generally accepted as an inappropriate and unrepresentative measure. This is due in part to the fact that LAeq averages noise power over 16 hours (7am-11pm) and, in doing so, ignores peaks and the additional annoyance/disturbance caused by night flights. Respected research indicates that measures such as Lden or N70 are more appropriate measures of annoyance. Lden, for instance, applies a 5dB evening and 10dB night time weighting and N70 records the number of high level noise incidents.
  - ii. The EU Environmental Noise Directive (END) 2002/49/EC requires Member States to make Strategic Noise Maps for major airports within their territories and the maps should represent

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<sup>1</sup> In their response to consultation in May 2014, MSDC identified the following road improvements that would be required:

- The M/A23, especially junction 10, but also the need for three lanes along its whole length from the M25 to the A27;
- M25 anticlockwise exit onto southbound M23;
- The M23- M25 link with Heathrow;
- East / west routes in general, but especially
  - o The A264 east bound from M23 J10 has major bottlenecks at Felbridge then onto A22 at East Grinstead;
  - o The C319 through West Hoathly and Sharpthorne;
  - o A272 from Winchester to the A22 at Maresfield;
- The B2028 through Crawley Down, Turners Hill, Ardingly and Lindfield.

Worth Parish Council formally endorsed the MSDC statement and also suggested that both junctions 9 and 10A of the M23 would need to be upgraded to full junctions, with junction 9 connecting to the A22 to specifically provide improved East/West connectivity. The proposed GAL contribution to local infrastructure would not even cover the cost of planning this.

Congestion in this area is already of concern, with the Crawley Down Neighbourhood Plan noting that, unless resolved, this could prejudice the continued economic viability of the village. There has also been a recent independent report (the JUBB report) which concluded that any further development in East Grinstead and surrounding area would not be viable without significant traffic improvements.

the annual average values. The directive is reflected in Environmental Noise (England) Regulations 2006.

The END requires the use of different parameters to those used in the current noise contours, namely:

- I. Lday (07.00 - 19.00),
  - II. Levening (19.00 - 23.00),
  - III. Lnight (23.00 - 07.00),
  - IV. Leq16hr (07.00 - 23.00), and
  - V. Lden (00.00 - 24.00).
- iii. Both BS and ISO standards recommend community noise limits to be 10dB lower in rural areas than in urban.
  - iv. The current thresholds are based on the unproven assumption that the majority of people affected would be in buildings of some kind and the noise would, therefore be somewhat attenuated (2dB). That is not necessarily the case for the more rural areas affected by Gatwick.
  - v. Doubling of aircraft numbers equates to a 4.5dB increase in noise (ANASE Study 2007) – something which the analysis ignores.

On that basis an absolute maximum 47dBA LAeq threshold of annoyance should be adopted for Gatwick as opposed to 57dBA at Heathrow for a similar level of annoyance experienced. Either applying appropriate thresholds of annoyance or representative measurement standards would confirm that far more people would be adversely and unacceptably affected by noise by the Gatwick proposal than the Heathrow proposal.

- vi. Aircraft that will bring reduced noise to residents have yet to be designed. Neither are there any specific relevant technical innovations on the horizon. Consequently such wishful thinking should not factor into consideration at this stage.

There are many areas around Gatwick that are rural and have high levels of tranquility that would be severely impacted by new development at the airport – as the reaction to experimental routes has illustrated. Specifically the Gatwick proposal makes no commitment to preserve these tranquil areas whereas the Heathrow options recognise the need to a flexible approach to aircraft over flight.

The conclusion reached by the Commission with regards to Gatwick's resilience in the event of disruption is incorrect. The Commission's view is that the proposed expansion of Gatwick would not worsen Gatwick's resilience to disruptive events.

This is incorrect as -

- should Gatwick lose a runway, diverted air traffic would cause congestion in the London Airports system as it would not be able to divert to Heathrow as that is near maximum capacity.
- the lack of proportionate development in the surface access around the Gatwick area will mean any road or rail problem will prevent passengers from arriving to or dispersing from the airport.
- Gatwick appears to have under estimated its financing and delivery risks when compared to the Heathrow options;
  - Failing to identify key dependencies in its critical path
  - Having unrealistic phasing of delivery and financing relative to the other runway options

In addition the Gatwick proposal –

- has a misleading tone, creating a perception that the proposal is one of “do minimum” to promote the future sale of Gatwick Airport, whilst the other two runway options demonstrate genuine intent to deliver benefits to the local community.
- has completely failed to identify the fact that it will need to “attract” airlines to grow, and therefore has not considered the actions it will need to take to attract the airlines, as the provision of the new runway and surface infrastructure alone will be insufficient.
- does not improve connectivity to growth markets or maintain London’s status as a global city, something the Heathrow proposals offer.
- is significantly less beneficial to air freight when compared to the Heathrow options which are highly beneficial to the air freight sector facilitating growth in cargo.
- has “non-viable housing plans” compared to the Heathrow options which are more realistic. In fact Gatwick doesn’t propose any viable solutions to the housing crisis which it would create.

**Q2. Do you have any suggestions for how the short-listed options could be improved .i.e. their benefits enhanced or negative impacts mitigated?**

The short-listed options could be improved by providing an indication of any:

- Government Compensation schemes that may be associated with the negative impacts including an indication of how schemes will be funded by the Government
- Cost per additional Air Traffic Movement (ATM) of economic benefit, which would facilitate a true comparison of options.
- Measures which would be employed to monitor and control noise and how any funds raised from fines etc might be used to compensate the local community most affected.

It should be acknowledged that wherever the expansion occurs there will be negative impacts.

To conclude the final recommendation must be a holistic one, and one which will bring maximum benefit to the UK and maintain London's status as a global city.

The most obvious improvement would be to remove Gatwick as an option.

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

The Commission's approach to this appraisal is misleading. The Commission's primary focus has been on the erroneous creation of a competitive London airport system, based on the belief that:

- Gatwick is nearly full to capacity
- Airlines will choose between runway locations (ie. Airports)
- Gatwick will enable a strong domestic route network and increase international connectivity if more capacity is available.
- Economic growth created by airport expansion would be to the economic benefit of the local community

These assumptions are totally incorrect, expansion will not enable international connectivity, expansion will only enable more runway slots, and the airlines appetite for slots will determine where international connectivity and growth of a strong domestic route network will occur. The Commission has significantly

over estimated that Gatwick is near capacity, by failing to understand that whilst Gatwick's existing runway is operating at approx 85% capacity, there remains head room for further growth, but airlines, for commercial reasons **do not wish** to utilise these slots despite Heathrow being full for a decade.

In addition, the Commission fails to acknowledge in the business case that Gatwick consistently fails to retain long haul airlines e.g. Garuda Airlines, Korean and more recently Vietnam Airlines.

- Easyjet, the largest short haul operator at Gatwick and a key revenue stream for Gatwick, have expressed concern that the increased landing costs needed to fund LGW2R would be likely to force it to look at moving somewhere cheaper, such as Stansted.
  - In turn, the commission would appear to have failed to ask the fundamental question appropriate to all business decisions – “what does the customer think?”
- i. CBI have stated that, wherever additional capacity is located, it should operate as a hub – a concept which GAL challenge and cannot offer
  - ii. The CEO of IAG has stated that there is no case for a second runway at Gatwick and a preference for Heathrow. So strong is that belief that IAG are currently bidding for Aer Lingus on the basis of obtaining additional slots at Heathrow.

GAL argue that a HUB airport (Heathrow, expanded Stansted or the Thames Estuary) is no longer necessary because that business model is out of date with the industry switching to point-to-point journeys. Disregarding the fact that the industry seems to disagree, if the GAL argument is valid, then it would be far more logical to support all airports other than Heathrow including Stansted and Luton and regional airports. Stansted already has capacity to 2040 and could be expanded easily and is on the right side of London for most of the country. The expansion of Gatwick does not serve the interests of the immediate area or the South East. It would also be worse for the UK economy and increase the overheating south at the expense of other regions.

In the evolving unstable economic market the UK's priority has to be global growth, and this should not be limited by the belief of some politician's to “force” UK airports to compete when no other country in Europe or Asia or State in North America attempts to do this.

The UK should not play the righteous nation by attempting to portray a political attitude of virtue and piety but we should protect and grow our status in the international market place and make the UK the international market competitor it deserves to be.

The Commission has failed to publicly counter misleading information provided by GAL as part of its aggressive marketing campaign. The GAL consultation in 2014 was misleading, missing key information and consequently misinformed local groups at a key period in the consultation process. Despite that, the response was overwhelmingly opposed. GAL attempted to manipulate the assessment by discounting several thousand of objections made by people supporting the reasons for opposition outlined by the Woodlands Trust. Just because lots of people support the Woodlands Trust is not a valid reason for discounting that opposition. GAL also tried to avoid presenting their proposals to Copthorne residents – probably the worst affected community apart from Charlwood. They were eventually forced into a “consultation” in Copthorne but refused to discuss potential flight paths or noise.

GAL marketing activities also included the contracting and publishing the results of intentionally misleading and unbalanced opinion polls such as the survey of 37 London Boroughs which, unsurprisingly, found in favour of Gatwick rather than Heathrow. They have signally failed to mention or address any of the points raised by almost every local authority in the area. WSCC, Mid-Sussex District Council, Crawley Borough

Council, Kent County Council and Wealden District Council all oppose the option and have raised relevant points.

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

The relevant factors that have not been fully addressed by the Commission to date include:

- deliverability of schemes
- risk scoring of the deliverability of the schemes
- an associated assumptions register
- airlines appetite to use the proposed additional capacity for all options
- evidence to demonstrate the “magnitude” of resilience in the London airports system that is created by each of the expansion options
- further evidence to explain which proposal fits best as a competitive hub in the international market
- further analysis to show how the current plans for the Brighton rail line will meet Gatwick's growth requirements
- further analysis to show how the current plan for the M23 will ease congestion as opposed to exacerbating it
- identification and costing of road and rail infrastructure to support Gatwick expansion outside the inward looking Gatwick proposals.
- Identification and costing of other infrastructure such as schools, health etc
- an expansion of the quality of life analysis to take account of the tranquil areas around Gatwick
- an explanation of why the quality of life analysis is only to 5km from the airport, and
- an explanation of how this relates to how people are affected by noise beyond 5km? Is this now a descriptor beyond which the Government considers that people are not affected by noise?
- A depiction of cost per additional ATM of economic benefit for each option
- The effect of creating so many new jobs in an area of almost unequalled employment levels on established businesses which are already struggling to obtain and retain staff. Additional competition for staff may be the final straw. Gatwick is likely to have a detrimental influence on local salary structures that other business may not be able to sustain
- The loss of over 280 business premises purely due to airport physical expansion.
- Economic risk to the area. The Commission has taken no account of the economic risk to the area if the second runway were to be adopted. Every competent business appreciates the risks associated with allowing one supplier or customer to become too large. An expanded Gatwick would dominate the area such that minor fluctuations in the fortunes of Gatwick would be greatly magnified in the surrounding economy. St Louis airport is a prime example. To put it another way, Gatwick would become too big to allow it to fail. Where have we heard that before?

**Q5. Do you have any comments on specific areas of the Commission's appraisal of specific topics (as defined by the Commission's 16 appraisal modules), including methodology and results?**

I have comments on two areas:

- The Commission scenario's for forecasting future demand for aviation broadly followed the approach taken in the first phase of work, however there is no evidence to indicate if the forecast demand in air traffic has accounted for airline demand for incorporation of the Airbus A380 into airline fleets.
- The Commissions appraisal of surface access around Gatwick appears flawed and requires

improved evidence to substantiate the results that the Brighton rail line and M23 satisfy the Commission's objectives for the short-listed options

**Q6. Do you have any comments on the Commission sustainability assessments, including methodology and results?**

The Commission has tried to take an unbiased approach to the Sustainability Assessments by trying to imply that a scheme is not suitable for progression due to poor performance in one area or a number of areas.

However whilst this approach to the consultation has been undertaken with the intent of being un-biased, it does not feel that this principle has been applied impartially as there is a “tone” of favouring Gatwick in this section, a tone which is embedded within the whole of the consultation.

In the case of Gatwick there has been a failure to assess the cumulative impact on Ashdown Forest which contains a SPA and SAC that are protected under the EU Habitats Directive.

In their submission GAL have only considered the impact of increased flights and have ignored the impact from increased traffic and disturbance, not simply from the passenger traffic but also the additional 60,000 workers around the airport. The Commission identified the Thames Basin SPA as a major problem for the Estuary Airport schemes. The problem facing Gatwick expansion is far more complicated. The South East Plan acknowledged that the housing targets it set in 2009 must be assessed for potential adverse effects on Ashdown Forest and Wealden District Council have done this in drawing up their Local Plan. The Wealden Local Plan has been examined and adopted and survived a challenge by developers. This plan sets an upper limit for development in Wealden that is lower than demanded in the South East Plan in order to avoid adverse impacts on the Ashdown Forest SPA and SAC sites and in order to comply with UK obligations. The evidence behind the Wealden Local Plan shows that the scale of development required to support an expanded Gatwick risks adverse effects on Ashdown Forest and so under the precautionary principle should be assessed and if mitigation measures are not possible avoided.

In contrast, neither expansion at Heathrow or Stansted would put at risk any similar protected sites of international importance, protected by international law

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

The Airports Commission's Strategic Case comprises

(1) a summary of how the scheme satisfies the Commission's assessment of need in terms of the (potential) capacity, connectivity and benefits of competition provided, and its impacts on passenger experience and the freight sector: and

(2) a description of the wider economic, social and environmental impacts with reference to existing spatial and economic strategies.

The Commission emphasises the fact that the Gatwick existing runway is currently operating at over 85% capacity with limited room for further growth in ATM. However, as I have already commented in Q3 the Commission has over estimated Gatwick capacity for further expansion and neglects to mention that it fails to retain or attract long haul airlines, which, if Gatwick was a realistic option, would obviously not be the case.

Estimates of the effect of a second runway at Gatwick are unduly optimistic. The runways can never be used to full capacity because the proposed second runway will be too close to the first at 1.035km separation. The CAA has raised safety concerns for dual mode on both runways as the parallel runways are too close and thus maximum capacity will not be reached. The recommended minimum separation is 1km.

The business case also advises that the current Gatwick owner is working with NATS to increase the utilization and resilience of its runway (albeit without consulting with its local community adequately), however the Commission has **not** acknowledged the current owners lack of loyalty to the UK economy by seeking to bring in a European Air Traffic Control Service provide (DFS) in place of NATS.

I have a concern that many of the promises made by Gatwick Airport Limited may be difficult to enforce if, as is the operator's stated intention, they sell the airport. A new operator, unless legally bound, may decide that some of the promises are too expensive to deliver. In the past Gatwick owners have repeatedly stated their intention to "add value" and then sell on in accordance with their standard business model. "Adding Value" in this case would appear to be obtaining permission for a second runway with minimum investment and commitment on their part – the corollary being hidden cost and risk for the UK. What guarantees (financial and legal) would the Commission require of any company bidding to provide additional capacity?

#### **Q8. Do you have any other comments?**

The Commission states that it does not believe that there will be any worsening of current levels of whole-system airport resilience, provided the on-going Future Airspace Strategy (FAS) and London Airspace Management Programme (LAMP) are successfully delivered – this in itself is risky, and specifically as Gatwick has "pulled out" of the FAS and LAMP delivery phase 1 due to its inability to consult properly with its local community. It is worth noting that FAS and LAMP benefits are dependent on NATS successful delivery of the Transition Altitude change and I would be keen to understand how the Government will hold NATS to account to deliver this on time?

GAL would appear to have a selective and short memory - as recently as 2012, GAL's senior executives said that their shareholders were looking to sell on Gatwick by 2019 and that there was no sustainable business case for a second runway. Their change of heart is purely opportunistic - an airport with a Government commitment to expansion will be worth more to shareholders in the forthcoming sale. This last minute conversion may also explain the lack of robust evidence or sound thinking to support the scheme. The Commission should assess the experience of the organization submitting the proposals and therefore the associated credibility.

The Commission has not been sufficiently critical/challenging of Gatwick Airport proposals, they do not stand up to examination

I call on the Davies Commission to reject the second runway scheme at Gatwick Airport.

