

Edenbridge Town Council



Sir Howard Davies
Airports Commission Consultation
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28 January 2015

Dear Sirs,

Thank you for this opportunity to respond to your Consultation Document issued in November 2014.

1. Executive Summary.

Our over-riding concern is noise and disturbance and in this context we wrote to you on 12 August 2013, with a detailed response to your Noise Discussion paper number 5. The focus of that correspondence was not only directed towards the impact of a second runway at Gatwick against which we are fundamentally opposed, but also to the problems of the existing runway faced by people in this constituency and beyond. As we are directly affected by the impacts of noise and disturbance, our response to the above Consultation and our answers to the questions you have raised are focussed mainly on this aspect (**see Q 6**).

We have also expressed our scepticism with regard to some of the conclusions drawn on infrastructure (**see Q 7**).

Our principle issue is the absence of an appropriate formula to balance the needs of those affected by noise and those who might benefit from the economic impacts of capacity expansion in the South East, as imposed by the guidelines set by Government in the APF. We have dealt with this aspect in our treatment of **Bundling, Weighting and Trade-offs in Q6 below**. Furthermore, the impacts of the existing single runway situation needs to be addressed as part of the overall consideration of a second runway.

We also raise the following issues in the appropriate sections including

Trust (see Q4)

Providing A lasting Legacy (Q8)

Flight Paths including Safety (Q8)

Complexity (Q8)

2. A summary of our core values.

Our letter dated 12 August 2013 describes who we are where we are situated and the unique combination of airborne circumstances blighting this community. More recent events involving airspace trialling and flight concentration PR-NAV have exacerbated the situation since that letter.

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Rather than repeat the issues themselves in detail we summarise the core values contained in that correspondence for your reference. For the most part we believe that the output from the Consultation project either places too little emphasis on their relevance or does not provide the decision makers with strong guidance upon which to formulate a decision. This reduces the legacy impact of this work, a point we return to in greater detail.

We support the views expressed by the High Weald Councils Aviation Action Group, of which body we are an Associate Member.

Regulatory Issues

The Government promotes a regulatory regime which, in our opinion is not fit for purpose, as evidenced by the following examples which the Commission either appears to support or presents no strong recommendation for change:- flight concentration policy; unregulated height and noise controls for landing; meaningless penalties for breaches on take-off; unrepresentative and ineffectual Airport Consultative Committees; an industry which self regulates by means of Master Plans and Noise Action Plans which contain no penalties for failure to meet its own targets; an industry in denial and confident that technology will achieve peace and harmony for all, which the whining A320 disproves with every landing approach; the lack of progress on Independent Noise Regulators, etc. etc.

Measurement Tools

We believe there is a need for stronger guidance by the Commission on the adoption of fairer noise measurement standards which more realistically represent the impact of noise as experienced by rural communities. There also needs to be more metering and transparency of information. These are real issues as the recent public response to the new flight trialling programme has shown, leading most of the senior Councils to reverse their earlier support for a second runway. We see little practical on-the-ground progress on these aspects.

Night Noise

We regard the existing night flight regime as unfair and insupportable and the Commission's apparent acceptance of the status quo, totally unacceptable. Our position is that all night flights should cease.

Compensation and Monetisation

While we believe that resolution of the Noise issue by monetary means is far from ideal, the absence of any proposals to calibrate a possible monetary fall-back by the Commission is an opportunity missed. GAL's recent publicised indications of compensation only covers those located closest to the runway (s) and ignores the significant numbers of homes further distanced from Gatwick which are blighted.

Mitigation

The absence of a comprehensive and meaningful Noise mitigation programme as part of the London Airspace Change-Gatwick Local Area Consultation must surely be addressed in your work on the second runway at Gatwick especially as flight paths for the new runway are beyond the scope of this process.

Health Issues

This topic appears to have been bundled away in one of your modules which devalues the importance of this issue.

3.Questionnaire.

We address the implications of these various headings in our response to your questions in more detail below.

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

We have not attempted to analyse the business cases in any great depth although we do find the £100bn difference in the value added assessment pretty compelling. That said we have approached the Consultation on the basis that Noise disturbance is a key issue and that in your consideration a more critical analysis of its impacts must be attempted whichever location is selected by the Commission, with practical solutions offered to communities who are disadvantaged.

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

We have to admit, unashamedly, that our approach to this Consultation has been through the prism of Noise and the associated disturbance and the negative impacts they present. That is to say, our sole objective is to draw your attention to the unique situation faced by the rural communities of this part of Kent in the hope that the Commission addresses these issues more robustly and/or recommends an alternative location to Gatwick.

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

From our perspective, while the academic output appears impressive and voluminous, we have seen little evidence of the Commission's presence on the ground or engaging communities affected by Noise at grass roots level. Such visits as have been made have been largely high level affairs eg at Crawley Town Hall and at Hever Castle whose principal objective has been to meet with County Councillors.

The Commission's response to those who were able to raise questions at these gatherings was along the lines of Noise being a common feature wherever the next runway is located, and without tendering a solution, hardly a comforting conclusion. So we would have liked to have seen more field work so that the Commission could experience Noise at first hand. It is a fact that Edenbridge, which is a front-line constituency of 11,000 inhabitants has not had any visitation by the Commission to witness the very real impacts that the industry is having on everyday lives despite our well-documented responses to all stages of the Commission's process. There is still time to redress that imbalance viz the absence of field work.

As far as the work itself is concerned we are not in a position to challenge the working process. However, we are surprised that when questioned at the Hever event on the respective importance of issues such as Noise within the overall assessment, your representative offered no particular formula to the weighting of Noise within the mix and suggested the Commission took a "balanced view of all the relevant facts", whatever that means. This may explain the approach which the Consultation has adopted regarding Trade-Offs and Bundling and which we find deeply inappropriate and comment upon accordingly (Q6).

Night flights is a particular issue and we are frankly horrified by the suggestion that night flights can be accommodated on the northern(existing) runway to minimise the noise experience for residents of Crawley.(1.6 and 9.7 of the Business Case and Sustainability Assessment ("BC&SA")) In any case we find it implausible to assume that night flights will decrease which are dependent upon GAL's (or its successor) pricing policy for night slots which have tended to be very cheap to attract the tourist traveller. Rather we would like to have seen the Commission calibrating the impacts of a night flight free environment at Gatwick similar to the voluntary system at Heathrow to provide a comparative case.

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

It is our assumption that the Commission will have been able to test and verify the largely redacted economic and technical data offered by the operators and the regulatory authorities in their respective submissions. This is necessary because some of the claims being made on other topics have been less than reliable, in our experience, not to put too fine a point on it. In some instances, it is difficult to separate sheer hyperbole from the ingenuous and clearly some of the financial engineering appears to us to be suspect as Sir John Stanley has shown..

To quote one recent example of this on the subject of flight paths, the day before the Gatwick Airspace Consultation closed the GAL senior executive for Sustainability was quoted on BBC TV with regard to respite. He said "Because of the new technology we're proposing to put in, it allows us with Air Traffic Control to then rotate some routes, especially for arriving traffic to provide those people on the ground with days, weeks or even months in some cases where they have no traffic at all"

The reality is that there are no respite opportunities being offered for aircraft approaching Gatwick below 4000' which most of them are, that is to say at least 12 miles out from touchdown. You would be right in thinking that this is a deliberate obfuscation of what is actually happening.

We have also been told that the height of aircraft approaching Gatwick over this constituency does not vary, whilst it is quite obvious, from the ground, that there is considerable variation depending upon the operations that day with departing aircraft. A senior representative of the CAA has assured us that there have been no changes to the flight paths they were planning to introduce following the outcry at their Consultation proposals yet we know that this is incorrect, and they have subsequently admitted it.

This raises two further matters. Firstly, we wonder if the mapping on which your Noise conclusions are predicated, are correct measures of actual noise impact on communities such as Edenbridge which is increasingly overflowed yet seen to be outside the noise disturbance contours you are receiving from the CAA? The numbers of complaints now being registered would support our contention that the distribution of noise monitors on the ground is insufficient or inefficient.

Secondly, and lastly, there is the **trust** aspect to be clarified. We wonder what efforts the Commission has made to adopt the 'smell test' to the feedback they have received from the operators on these sensitive public issues. Changes to airspace usage which have been trialled over the past few months have resulted in unprecedented numbers of complaints, yet GAL continue to issue press statements pointing to the small numbers of people who would be affected by their expansion.

These distortions could understate the Noise impact solutions referred to in the work done by the Commission and its overall relevance to communities in the sway of Gatwick. An example of this can be found in 1.60 of the BC&SA to which we have drawn attention in Q3 above.

While we cannot verify these suspicions we believe it is justified to ask the Commission to state what road testing has been made on some of these areas of investigation.

Q5 Do you have any comments on how the Commission has carried out its appraisal on specific topics (as defined by the Commission's 16 appraisal modules, including methodology and results?)

Our comments on the contents of your Noise module are our paramount interest although where appropriate we have made reference to other module topics where they inter-relate with our own local interests. Specific examples of the weakness of your bundling process are highlighted in the next section.

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

Noise

We have already shown the main focus of our interest is your Noise module, which relates more to the social and environmental aspects of your analysis than economic sustainability.

The high level objectives as stated by the Government on aircraft noise include, inter alia, a fair balance being struck between the negative and positive aspects of airport expansion with the benefits being shared between the industry and local communities.

We therefore contend it is highly dubious to deal with the problem of Noise for those in rural areas in the way you are suggesting ie by bundling. Crudely put, you seem to be saying that the economic contribution balances the noise impact suffered by the "few" and so the social equation is balanced. In the absence of a publicised weighting process for the individual parts of the exercise, it is difficult to know how this conclusion has been obtained. We also find this too simplistic an approach, grossly unfair to those disadvantaged and a dangerous weapon to be placing in the hands of an industry that is doing insufficient to reduce the negative impacts which it is already creating.

We understand bundling to be a conceptual replacement for trade-offs which whilst not ideal in themselves do recognise that those who are disadvantaged by a set of measures, for example concentration of flight routes, can, and should be compensated by some form of agreed mitigation to offset these disadvantages eg the cessation of night flights, or of planned, rolling respite programmes.

We also challenge as scarcely credible the assertion you make in 9.70 of BC&SA that despite the doubling of night ATM's noise will reduce thanks to advances in technology. Unless the pace of regulatory approach and/or industry goodwill and application to the lowering of noise intrusions is increased we fail to see how your statement is sustainable. Without more appropriate noise measurement, without regulatory change and without a shift in the industry's mindset to combat noise this simply will not happen. As an example of the industry's reluctance to self regulate, the noise emitted by the A320 on arrival and which is the subject of considerable anger for people disturbed (up to 25 miles from the runway) is a cost issue which the airport operators refuse to eliminate (by banning their use) or Easy jet and BA, who operate them, investing now in modifications to remove this blight which otherwise will continue for a considerable number of years to come until their extensive fleets are fully updated.

Furthermore, while you have presented comparative numbers showing that more people would be affected by noise at Heathrow than Gatwick, the true impact cannot be quantified until the flight paths and the consequent concentration for the new runways are determined.

This Council is fundamentally opposed to the policy that as long as the number of residents negatively impacted by noise is reduced, it is perfectly acceptable to increase the concentration and intensity of flights over the remainder, particularly where this involves the overflight of AONB's (an acronym which is not to be found in your document) and/or other areas of tranquillity. This is the corollary of your bundling approach and we therefore contend that it is unsustainable.

Could we finally refer to the conclusions you have drawn in the Quality of Life Section which we believe underscores the weakness of this aspect of your process. You say in 15.14 of the BC&SA "Nationally, the impact on Quality of Life, given the net positive impact on jobs, increased leisure connectivity benefits is SUPPORTIVE. Locally we expect the impact with respect to noise alone to be ADVERSE and local economy alone to be SUPPORTIVE. However these two impacts combined, along with all other impacts locally, leads to an overall local impact of NEUTRAL". A similar sweeping assessment can be seen in the way you have assessed Community Impacts as

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NEUTRAL based on the mitigation being proposed.

Again, without knowing the weighting of each constituent element it is impossible for us to analyse how you reach these conclusions. In any case we believe that the whole idea of bundling random elements under one banner headline to draw such broad brush conclusions endangers the credibility of your whole Sustainability exercise. We contend it will lead to unfair outcomes for those affected by noise and if adopted will prevent a fair negotiation by communities so adversely affected. Noise, in this context, is a negative commodity and needs to be addressed by the measures we have suggested in the form of trade-offs as you have referred to (2.16) or, in extremis, by realistic and acceptable financial compensation for those blighted by the impacts airport activities generate.

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

Sir John Stanley's submission to the House of Commons in the Christmas Adjournment (Hansard 18 December 2014) admirably lists a number of financial and corporate shortcomings of the case submitted to the Commission by GAL. No doubt you have taken due note of the points which he makes. We do believe that a number of essential building blocks within your presentation are highly controversial. We are quoting 3.

1. You state that there is little risk of the jobs created by the expansion of Gatwick "could not be absorbed" within the local area. Our understanding is that "there is simply not the labour force to staff an expanded Gatwick" (Letter from Chairman Gatwick Co-ordination Group to Stewart Wingate Chief Executive of Gatwick Airport Limited 20 October 2014).

2. You state that the pressures on existing housing would be exacerbated by the expansion but "not of a scale which is likely to significantly increase these pressures" ; in 3.25 your suggestion is that these would be "negligible". This is an extraordinary statement and the reality must surely be that the impact of this development will impose enormous strains on the local authorities who are already struggling to meet current housing needs. In addition, the impact on the Green Belt consequent of building homes to accommodate the expanded workforce would be unacceptable to many people who are rightly protective of their rural environment. The direct costs of this pressure would not be borne by the operators and the indirect costs are unquantifiable.

3. In 3.9 you summarise the upgrades of the road system to accommodate the impact of the doubling of throughputs. But these will not address the problems of road access to the heart of the capital served by a road system which is already close to gridlock and the upgrades for the M23 and M25 to meet existing such needs are unfunded. The reliance would appear to be dependent on the upgrades to the rail system already announced. Yet these improvements were planned before any thought had been given to a second runway. Our empirical judgement would be that the changes to the rail capacity, significant though they may be, will not provide the spare capacity required to deal with the impact of a second runway, leading to intolerable pressure for travellers and thereby representing a large negative cost to the project. This view is shared by many of the councils directly affected by these changes and by the Gatwick Coordination Group.

As a local council, we fear the surface access impact on our own local road system which is already struggling to cope with the cut-through traffic between Ashford and Gatwick along winding B class roads whose surface integrity is threatened by container lorries and the sheer volume of traffic. In the light of this we find your reference in 2.48 to the public sector picking up surface access costs as highly controversial if this were to be pursued by government and unsustainable for local budgets.

Q8 Do you have any other comments?

We would like to draw your attention to the following comments.

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Complexity. We would have appreciated a working Executive Summary given the size and scope of the material we have needed to investigate.

Safety. There is no doubt that the skies over the South East are crowded and will get more crowded with or without a second runway at Gatwick. There is a cost to safety which should be included in your infrastructure analysis so that there is sufficient capacity to cover all aspects of this critical ingredient, including the funding of the additional facilities which will be required. This should include extra ground security costs.

Legacy. Whilst it would be churlish to criticise the academic merit of your work however we feel that by introducing the bundling concept, a concept to which we have already raised our objections, you have side-stepped the problem of securing the objectives of balanced, shared outcomes referred to in the introduction to your Discussion Paper No 5. The airport capacity issues in the south east which have dogged politicians for 50 years will re-occur if your predictions are correct almost as soon as the outcome of this project have been determined. Hence recommendations which will stand the test of time are required to deal with the "soft" issues, for example, Noise and Disturbance which most concern us. In the absence of trade-offs it seems to us that some financial formula to cover all who have been blighted would be needed.

In the words of Professor Dieter Helm (Member of the Economic Advisory Group to the UK Secretary of State for Energy & Climate Change and fellow at New College Oxford) "If a project is worth doing, those who gain should be able to compensate the losers whether for noise from aircraft, disturbance from fracking, or the house price effect of HS2" (Financial Times 21.12.2013). That seems immensely sensible.

As an academic powerhouse, we would have liked to see the Commission leading this approach and develop a fair and meaningful economic formula which goes beyond the tinkering of Council Rate bands for a few householders close to the airport. This "generous" offer (15.13 of BC&SA) does not cover the economic destruction of the AONB's or the blight of householders 10-20 miles plus from Gatwick.

The evidence we perceive from reading these papers is that these issues are either dismissed or are being bundled into solutions to suit the perceived commercial advantage of the project, or left for the government to determine.

Given the time, effort and expense directed to this consultation project, the absence of a legacy inheritance that provides tools for the government to make economic decisions on some of the more intractable issues such as Noise and Disturbance, which are balanced and fair, would be a huge disappointment.

Finally, we would ask that your final report impresses on the Government the need for an Independent Authority to ensure fair play is indeed achieved for the implementation of any and all airport expansion programmes.

We trust you will have found our comments constructive and useful.

Yours sincerely,

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