

RESPONSE to the AIRPORTS COMMISSION CONSULTATION on
PROPOSALS for ADDITIONAL RUNWAY CAPACITY
from
SPELDHURST PARISH COUNCIL – February 2015

Responses to the Airports Commission Consultation Questions:

Question 1.

A second runway at Gatwick is unacceptable for a number of reasons. Detailed reasoning is provided in the answers below to the subsequent questions. The Heathrow options whilst appearing to cost more also show very substantially greater economic benefit, vastly in excess of the apparent incremental cost. However, we do not believe the full infrastructure costs necessitated by a Gatwick expansion have been identified. Road and rail expansion plus school, hospital and services capacity will all be required and are not apparently properly accounted for, making the Gatwick option much more expensive in terms of State (local or national Government) cost – meaning every taxpayer.

Question 2.

In order for a second runway at Gatwick to be more acceptable the following would be needed as a minimum:

- Much greater improvement in road and rail infrastructure than that proposed. For roads this needs to consider much more than just some improvement to M23/A23 and needs to reflect and address the additional burden on and, therefore, the need for expansion to feeder and surrounding road networks, especially for those living east of Gatwick for whom public transport links to Gatwick are almost non-existent and woefully inadequate for the current let alone an expanded Gatwick.
- Much greater provision of new housing, schools, hospital capacity, GP capacity, Social services etc. is required, and including the provision of suitable water, gas and electricity services, all of which increases the burden on public financing.
- A critical aspect of any expansion at Gatwick must be a mandatory requirement that flight arrivals will be channelled over a broad swathe to maximize respite for those affected and that there is no implementation of any flight path super highway to each or either runway, which would devastate affected communities.
- A very substantial proportion of the additional costs for the provision of these services and road and rail infrastructure should be borne by the airport. Gatwick Airport has maintained that little or no state funding would be required in connection with its proposed expansion but that is because it has not properly addressed the relevant infrastructure issues. It is unacceptable that local or national government should have to commit enormous funding (especially in the current strained economic times) in support of an expansion proposal that is itself flawed (see later comments on the business case).
- Any promises from Gatwick Airport in respect of any financial or other commitments to mitigate the above, and also including Gatwick's promises of compensation to affected individuals, must be enshrined in a legally-binding document. Foreign ownership of Gatwick Airport (and in particular the expressed intent of the majority foreign owner to exit ownership after securing expansion agreement) undermines any confidence in the sanctity of any verbal or written, but not formally legally binding commitments, and clearly undermines any confidence in Gatwick's commitment to its neighbours. The suggestion by Gatwick of funding double glazing for those in their 'noise envelope' is fundamentally flawed. People in

our areas (outside Gatwick's noise envelope) are very much affected, in particular with night flights, but in addition the double glazing "solution" ignores the impact on people when outdoors. The suggestion, made by Gatwick's Head of Corporate Responsibility in response to concern over night flight noise, that people should not sleep with their windows open in summer, just to suit the plans of GAL, is a staggering display of arrogance and again an indication of Gatwick's attitude to the disturbance caused by its activities to its neighbours.

- There should be a complete cessation of night-time flight in to and out of Gatwick during a core night-time period (11.30 p.m. to 5.30 a.m.) in much the same way that residents around Heathrow benefit from a night-time curfew on flights at that airport.

- There also needs to be safeguards, legally-binding on Gatwick Airport and its owners, to ensure preservation of the peace and tranquility of the Areas of Outstanding Natural Beauty (AONB) around and near Gatwick and the communities in and around them, and the vital importance of ensuring the sustainability of the local tourism industry, critical to much of this part of the country.

Nevertheless, even if all the above issues were fully and satisfactorily addressed we still believe expansion of Gatwick is inappropriate as later answers will indicate.

Question 3.

The Commission's approach has been open, fair and consistent.

By contrast Gatwick Airport has failed to display the same qualities. In its dealings with the local communities (where it has not simply ignored them, often the case) it has been opaque, has misled by omission or deliberate inaccuracy and at times has been patently dishonest in its comments and responses. At best it has been economical with details, facts and the true position. All of this has led to a position of complete mistrust in the local communities and supports the requirement for strict, robust legally binding obligations before Gatwick is even considered for any potential expansion.

Question 4.

The Commission is wrong to have discounted underused capacity at other airports in the South before considering expansion of Heathrow or Gatwick. However, in terms of responding to a need for greater hub airport capacity Heathrow is the only option.

The Commission is wrong to have discounted a new airport in the Thames estuary (either on or near the South Bank as in a couple of initial proposals, or perhaps on the North Bank). Creation of a new world-class hub in the South East serving London is a long-term solution. Expansion of Heathrow is potentially not a long term solution. Expansion of Gatwick is neither a long-term solution nor a short term fit in respect of additional hub capacity. Heathrow is the UK hub airport, the hub can never operate split between Gatwick and Heathrow and attempting such will kill existing hub trade thus damaging Heathrow and almost certainly the key hub-carrier, BA.

Question 5.

Strategic Fit – Expansion of Gatwick is not wanted by the two main airline-users of Gatwick, BA and easyJet. Both reject the need for expansion and raise significant concerns over resulting increased costs.

Economic Benefit – The Commission's own figures indicate the economic benefit to the UK from expanding Gatwick is half that of expanding Heathrow. Thus the somewhat greater cost

of Heathrow expansion is easily justified by the enormously greater economic benefit. The economic impact of Gatwick expansion needs to include the substantial adverse impact on the South East rural tourism economy which is already struggling with Gatwick's latest impact and will be devastated by a massive increase in Gatwick air traffic. With many historic sites such as Hever being forced to close (their main draw is the rural tranquility which will be destroyed) and with the loss of the tranquil countryside tourism will plummet and huge numbers of jobs lost. From a popular and prosperous destination East Sussex and West Kent will become tourist wastelands.

Local economy – The local economic benefit from additional jobs is questionable given the cost of additional services (see above comment re Question 2) if workers migrate permanently to the region. However, if workers day-migrate to work the benefit goes outside the local community. Furthermore the regional economy is heavily dependent on tourist trade attracted by the peace and tranquility of AONB's and numerous heritage sites. Substantial additional air-traffic noise will undermine or in some cases kill this trade with significant negative economic and environmental impact.

Noise – This is partly addressed in the point above; the impact of noise through loss of tranquility has a substantial negative economic impact in the region, destroying in some cases important heritage sites and their proper availability and undermining the sustainability of the vital regional tourism industry. Noise disturbance is greater in rural areas than in urban areas given the higher ambient background noise in the latter. As a result the disturbance through loss of tranquility is more noticeable in rural areas. There needs to be a more rigorous and comprehensive noise-monitoring regime, administered by an independent Noise Regulator. Appropriate Noise measures need to be adopted and there need to be enforceable mitigants and penalties for breach of the specified noise limits.

The negative impact on education is a critical element for consideration. It is worth including here a small part of a survey conducted in one village primary school in our Parish in mid January 2015. Covering children in years 1-6 (aged 5-11 years) 77% noticed plane noise in bed in the morning and 68% noticed plane noise at night. 66% noticed planes overhead during lessons (100% of those in year 6!). Most concerning in year 6, during lessons, 65% had to stop and wait for aircraft noise to fade before continuing a lesson (this same comment made by 2 teachers). The problem worsens as the children get older, potentially disrupting sleep, interrupting lessons and hindering learning. With planes overhead constantly as would be the case with an expanded Gatwick, our children's education would be seriously impaired in this and the many other schools similarly affected, particularly in rural areas, around Gatwick.

Question 6.

Given the relatively small number of unemployed (figures from those on Jobseekers's allowance) within the area, substantial in-migration of workers would be required to fill the anticipated job levels on either a permanent or daily basis straining local services in the case of the former and thus requiring major infrastructure investment, or with little noticeable economic benefit locally in the case of the latter, whilst placing yet more burden on transport infrastructure required to cope with a potential trebling of passenger numbers. Given that many of the jobs created will be low-wage jobs it is hard to see large numbers of workers being prepared to travel long distances in and out daily, so permanent in-migration of workers (along with their respective families, thus greatly increasing the in-migration total

numbers) is the only way to meet the job demand. This brings the focus back very firmly on to the inadequate measures for the provision of infrastructure, housing, schools, hospitals, services, etc.

Question 7.

Business Case – Tellingly Gatwick’s two main airline customers , BA and easyJet both reject any business case for the expansion of the airport and cite major concerns to their own businesses over increased costs that would result from expansion (cost increases which the Commission’s own figures indicate would be substantially more than Gatwick has indicated).

Question 8.

The only final comment is to reiterate complete opposition to a second runway at Gatwick.

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