



RESPONSE TO THE AIRPORT COMMISSION'S CONSULTATION ON RUNWAY OPTIONS

1 February 2015

The Airports Commission Runway Consultation

Introduction

1. GACC, founded in 1968, is the main environmental body concerned with Gatwick Airport. In addition to individuals, we have as paid-up members nearly 100 councils and local environmental groups.
2. This response has been approved by our committee, who are elected at our annual general meeting and who come from a wide area around the airport. It is based on a similar document *Gatwick Unwrapped* which was circulated in early January to all our members, and includes their comments and additions.
3. We welcome the methodical and rational approach adopted by the Commission, and are glad to be re-assured that the Commission has not been influenced by the advertising, publicity and lobbying campaign by which Gatwick Airport Ltd have sought to use the power of money (tax-free) to subvert the power of reason.¹
4. The Commission is asking for points on which their analysis may be incorrect or which they may have overlooked. We have picked up a number of such points and have included them in bold print in this response. Our answers to the questions in the consultation paper are at the end of this document.

Why we are opposed to a new runway at Gatwick

5. We are opposed to a new runway because, in summary:
 - The character of much of Surrey, Sussex and Kent would be altered for ever;
 - It would cause large scale in-migration of labour from other parts of the UK and from the EU;
 - About 40,000 new houses would be needed, also many new commercial premises, causing urbanisation and loss of countryside;
 - A severe strain would be put on local hospitals, doctors, and schools;
 - Increased aircraft noise would affect three times as many people as at present;
 - New flight paths over previously peaceful areas would cause intense disturbance, distress and anger;
 - We calculate that 100,000 more vehicles a day plus more commercial traffic would use the roads, causing serious road congestion and delays;
 - With 90,000 extra people a day using rail services, the result would be standing room only;
 - Nineteen listed buildings would be demolished - more than at any time since the WWII blitz. 14 hectares of ancient woodland would be destroyed;
 - Twice the number of flights would mean twice the climate change damage;
 - Very substantial costs for new infrastructure would fall on the taxpayer.
6. In opposing the Gatwick runway we are glad to have support from West Sussex County Council, Kent County Council, Crawley Borough Council, Horsham District Council, Mid Sussex District Council, Mole Valley District Council, Tandridge District Council, Tunbridge Wells Borough, and Wealden District Council. And

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from virtually every Town and Parish Council in a wide area around Gatwick. And also from The Council for the Preservation of Rural England, The Woodland Trust, Friends of the Earth, Greenpeace, RSPB, WWF UK, the Green Party and the Liberal Democratic Party. None of the local Members of Parliament support a second runway.

7. As an environmental organisation we cannot support a new runway at Heathrow. **Indeed we consider that the consultation presents the public with a false choice between Heathrow and Gatwick. Because a new runway at either airport would have such serious environmental impact, the option of no new runway should now be reconsidered, and should be presented to Parliament with equal status.**

Noise

8. The consultation document continues to compare the noise at Heathrow and Gatwick on the simple and naïve basis of the number of people within the Leq contours. This gives a misleading impression that noise is - by comparison - a small problem at Gatwick.
9. The Leq contours measure the area affected by the physical volume of noise: they do not measure the amount of disturbance and annoyance. When account is taken of background noise levels, it can be shown that the difference in the level of disturbance at Gatwick compared to Heathrow would be much less marked than shown in the Leq figures. The International Standards Organisation recommends a 10dB difference in the assessment of noise in rural areas compared to urban residential areas, to allow for the difference in background noise levels.² If that 10dB is taken into account, the difference between Gatwick and Heathrow is less marked.³ **We request that this factor is taken into account in the recommendations of the Commission.**
10. Moreover, Gatwick is surrounded on three sides by Areas of Outstanding Natural Beauty - the High Weald AONB and the Surrey Hills AONB - each visited by over a million people a year in search of peace and tranquillity. Many rural businesses require a high level of tranquillity. We are glad that the consultation document recognises that '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 disturbance at Gatwick is, of course, particularly severe at night when background noise in rural areas is virtually nil and sleep is disturbed by aircraft.
11. Proximity to Crawley. The airport plan published by the Commission shows that the new runway would lie only about 400 yards north of the residential areas of Crawley. The new airport boundary would be within 100 yards of the most northern houses.⁴ It would only be 150 yards from an important Hindu temple. We are disappointed that there is no mention in the consultation document of the impact of noise on schools. There may be more schools at Heathrow but again the issue of background noise is relevant.
12. A new earth bund is shown on the south west corner of the enlarged airport, and this is welcome. No visual or acoustic protection is shown to protect residents in the eastern part of Langley Green. **We request that the earth bund should be continued all the way to the old A23.**

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13. Noise contours. A wide range of noise impacts is shown in the consultation document, depending on the type of metric used and on the future use of the airport, but they all show that the number of people affected by noise with a new runway would be two or three times as many as at present.
14. **These figures, however, do not include the 5,000 people who will be moving into the new houses currently being built at Forge Wood, on the north east of Crawley. (These houses were permitted by a decision of the High Court partly based on a statement by Gatwick Airport Ltd in 2010 that they ‘had not a shred of interest in a new runway.’⁵) Nor do the figures include the inhabitants of the 500 houses recently given planning permission in Copthorne; nor the inhabitants of the village of Warnham despite that village being clearly shown under a new flight path from the new runway.⁶**
15. Ground noise. GAL has admitted that the noise from aircraft maintenance, from aircraft taxiing, and other airport operations would become worse for Crawley, Charlwood, Povey Cross and Horley.⁷ **The construction of earth bunds or noise barriers should be included as legal obligations, and included in the cost.**
16. Ifield, with its historic church (grade1) and attractive Conservation Area would be badly affected by ground noise. **It would be essential that the earth bund shown on the south-west corner of the proposed airport was at least 15m high.**
17. Charlwood, a historic village with over 80 listed buildings, would be particularly affected by the proposal to build four new hangars on the north-west side of the airport.⁸ We are glad to see that the map published by the Commission includes a new bund around the north west of the airport (it was not included in the plans published by GAL in April 2014). **To provide the necessary visual and acoustic protection this bund would need to be at least 15m in height, as with the existing bund on the north side of the airport.**
18. Ground noise would be still further increased for Horley and Charlwood if End-Around Taxiways were constructed.
19. At the western end of the existing runway there is sufficient space but with an adverse impact on the village of Charlwood. **It would be essential to extend the 15 m. earth bund around any new End-Around taxiway.**

Flight paths

20. A major operational problem at Gatwick is that the two existing terminals are on the north side of the existing runway while the new runway would be to the south. It is therefore proposed that the runways would operate in ‘independent mixed mode’ with each runway handling both arriving and departing aircraft. Aircraft using the new southern runway would use the new terminal between the runways, and would mainly use flight paths to the south. Aircraft using the existing runway would use the two existing terminals and would mainly follow flight paths to the north.⁹
21. **The Commission needs to note that with both runways handling arrivals and departures, there could be no scheme to provide daytime respite by alternating the use of the runways, as at Heathrow.¹⁰**

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22. The proposed runway separation of 1,045m is only just greater than the minimum of 1,035m allowed for mixed mode operations by international safety regulations.¹¹ Thus there would be frequent occasions when two aircraft approaching Gatwick would be side-by-side only one kilometre apart for the final ten or fifteen miles: this separation would require accurate navigation and might not be practicable in strong winds. **This would reduce the resilience of Gatwick to bad weather delays.**
23. New flight paths. The Commission's document *Operational Efficiency: Airspace* shows possible new flight paths with a new runway.¹² While said to be only illustrative, certain conclusions can be drawn. Aircraft departing from the existing runway are shown using the present flight paths, except that no routes to the south are shown. Thus the number of aircraft using the present routes would be approximately double.
24. All aircraft departing to the west from the new runway are shown as using two new flight paths, one over Warnham and North Horsham (on the track of the immensely unpopular ADNID trial); and one turning sharp left to fly over the eastern side of Horsham. All aircraft taking off to the east are shown as taking a new route over Copthorne and Crawley Down, and close to East Grinstead. Arriving aircraft on both runways are shown as taking two concentrated flight paths to the east or two to the west, from a 'merge point' (or perhaps two 'merge-points') in the vicinity of Haywards Heath.
25. All these new flight paths - and especially concentrated flight paths - as experience in the past year has confirmed, over peaceful areas cause massive anger and distress because the previous quiet is shattered, expectations of tranquillity brutally destroyed, house values depreciated and people left trapped unable to move away without serious financial loss.
26. **The Commission needs to take on board that the disturbance caused by new flight paths would be far greater than is measured by the conventional Leq or Lden metrics. And it would extend for 20 miles from the airport, much further than the Leq contours.**
27. The Commission is basing its forecasts on the welcome assumption that there would be no increase in the permitted number of night flights. There are, however, widespread fears that, if Gatwick grew into a major airport, with a variety of new airlines, there would be pressure on the Government to raise the number and noise quotas for night flights. **We ask the Commission to include in its recommendations that there must be no increase, and indeed a steady decrease, in the number of night flights.**

Operational Problems

28. Aircraft having to cross an in-use runway is a well-known safety hazard. It also takes time, using up the equivalent to a take-off or landing slot. Yet this problem is created by the design of Gatwick with the two existing terminals on the 'wrong side' of the runway. The proposed procedure whereby flights headed north would be allocated to the existing terminals and flights to the south would be based on the new terminal would cause an operational problem for airlines such as easyJet which operate services both to the north and to the south: they would need to duplicate their facilities in both terminals.

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29. There would also be a problem where an aircraft had arrived from, say, Scotland and was due on its next leg to depart for a European destination. In such cases the aircraft would either need to cross the active runway or cross the flight path of other aircraft. An attempt to solve this is the suggestion of end-around taxiways (EATs). However there appears some confusion on this point. The map published by the Commission does not show any such taxiways.¹³ On the other hand the report on Operational Efficiency assumes that they will be provided, and that failure to provide them would 'compromise capacity, efficiency, resilience and safety'.¹⁴
30. There is space at the western end of the existing runway for an EAT but since it would only be used under arriving aircraft such an EAT would only be used on an average of 25% of the time.¹⁵ At the eastern end of the existing runway there does not appear to be sufficient space to construct an EAT without putting the roads and rapid transit system underground. **The cost of doing so should be included in the total cost of the project.**

Urbanisation.

31. A major concern for the public and for the local authorities is that a second runway, making Gatwick eventually as large as any airport in the world today, would lead to the urbanisation of much of the surrounding area, and to great pressure on all aspects of the infrastructure.
32. In our response to the appraisal consultation we queried whether the Commission was correct to assume that economic growth, based on an increase in jobs, is necessarily beneficial. In the Gatwick area unemployment is low. The creation of a large number of new jobs therefore means attracting labour either from the north of the UK, worsening the north-south divide, or from other parts of the EU adding to social tensions.
33. Much of the economic benefit would accrue to the workers moving into the area, not to existing residents. The correct measure should not be an increase in GDP, but an increase in GDP per head.
34. **New jobs.** There has been much debate about the number of jobs that would be created by a new runway, and where they would be. On the outcome of that debate depends the number of houses that would need to be built and the pressure on the roads and on rail services.
35. The consultation document suggests that a second runway would increase the number of airport jobs in 2050 by between 7,900 and 32,600. **We consider these figures to be serious underestimates for two reasons:**
- a. they do not include the number of jobs created in new firms attracted to the area (the catalytic jobs); and
 - b. they do not include the induced jobs - those created in the local area when the extra workers spend their money.
36. According to the Gatwick Master Plan, the actual number of airport jobs at Gatwick in 2012 was 23,200. Indirect employment (eg off-airport hotels, local taxi firms, catering) was 2,900; and induced employment (local jobs created when airport workers spend their money) was 15,600; bringing the total number of jobs generated by Gatwick to 41,700.¹⁶

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37. Catalytic jobs. On top of the 7,900-32,600 airport jobs it is necessary to add the catalytic jobs. Research quoted in the consultation document puts the total number of new jobs, including catalytic, as 'rising to 90,000 by 2060.'¹⁷ That would imply around 60,000- 80,000 new catalytic jobs.
38. The consultation document (and GAL) maintains that many of these new catalytic jobs would be created in London or across the South East - from Oxford to Margate, from Littlehampton to Canary Wharf - as a result of firms being attracted to the whole South East by the fact that it had two large airports.¹⁸
39. We do not agree. A substantial proportion of the new firms attracted by a new Gatwick runway would wish to set up near Gatwick. So also for existing firms expanding. This view is supported by implication by the Gatwick Diamond business association and by the Gatwick Diamond Initiative (the body representing local councils) both of which have campaigned for a new runway on the grounds of the prosperity it would bring to the local area. Stewart Wingate, Gatwick CEO has recently stated that: 'many businesses choose to locate nearby because of the opportunities and global connections the airport brings.'¹⁹
40. If we assume that at least a third of the catalytic jobs would be created in the Gatwick area, that would imply around 25,000 extra jobs. That roughly corresponds with the conclusion of the independent study commissioned by the West Sussex County Council and the Gatwick Diamond Initiative which found that 'The catalytic impact of 2 runways would be dramatic and could more than match the number of [airport-related jobs]'²⁰
41. Induced jobs. All the above figures exclude local induced jobs (generated when employees spend their money).²¹ If, as mentioned above, the airport generated 15,600 induced jobs in 2012, then it would seem safe to assume that the extra employment due to a second runway plus the new catalytic jobs, would create at least 15,000 new local induced jobs.²²
42. Total number of jobs. Thus adding together the new direct and indirect jobs, plus the new catalytic jobs, plus the induced jobs, it would appear that a new runway might create a grand total of very roughly 60,000 extra jobs in the Gatwick area.
43. GAL maintains that much of the labour to fill these new jobs would come from south London, particularly the Croydon/Wandsworth areas, or from the South Coast. But only a small proportion of the existing labour force comes from those places, and it is hard to see why the proportion should suddenly increase. According to the consultation document, jobs at Gatwick with a second runway would remain mainly low skilled.²³ They would presumably be low paid, and it is hard to see why those seeking work in Croydon or Wandsworth would prefer to work at Gatwick rather than in better paid jobs in Central London.
44. **Therefore, with low levels of unemployment in the Gatwick area, the creation of around 60,000 new jobs would far exceed the available labour, and could only be filled by large scale inward migration from other parts of the UK or from the EU.**
45. New houses. Consultants commissioned in 2013 by the West Sussex County Council and the Gatwick Diamond Initiative concluded that the new jobs created by a new runway would create a need for 30,000 - 45,000 new houses - equivalent to a new town the size of Crawley.²⁴ That estimate is roughly confirmed by our

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calculation of around 60,000 new jobs.

46. The consultation document puts the figure at 18,400 new houses.²⁵ But that is based on a calculation of extra jobs which we have shown (paragraph 35 above) is far too low. **We consider that the figure of around 40,000 new houses would be more accurate.**
47. The consultation document suggests that these properties might be split evenly across 14 local authorities from Croydon to Worthing. **That is unrealistic. Several of the local authorities are within the Green Belt. Others, such as Crawley (which already has nearly 3,000 on its housing waiting list), have no space left for building.**
48. **The building of around 40,000 new houses would mean a serious loss of countryside.**
49. **The in-migration of labour would put a severe strain on other social infrastructure, such as hospitals, schools, doctors and social services.**
50. Business premises. 286 business premises would be demolished to enable the new runway to be built, including City Place (Head Office of Nestlé), the Lowfield Heath Business Park, and part of the Manor Royal industrial area. GAL has suggested that replacement land might be found for some businesses on the land east of the railway (to be acquired as part of the runway plan), although they recognise that to use a substantial area for this purpose would require the (expensive) double decking of car parks. **This cost should also be added to the estimated cost of the runway plan.**

Road congestion

51. The extra road traffic due to a new runway would come on top of a forecast growth in weekday car trips and distance travelled in South East England of 40% by 2041.²⁶ Already the M25 is often at a standstill for parts of each day, and has been described as ‘the largest car park in Europe’. And the M23 near Gatwick has an ‘on time’ score of under 60%.²⁷
52. We are therefore surprised that the consultation document only lists a few minor road improvements within a mile or so of the airport.²⁸ Otherwise the Commission appears to accept GAL’s contention that they can rely on improvements to the M23 and M25 that are already in hand. These improvements, such as hard-shoulder running on the M25, are required to deal with the forecast growth in road traffic without a new runway.
53. **The consultation document seriously underestimates the increase in road traffic. This is because the assessment -**
 - a. **is based on forecast road traffic in 2030, when the new runway would be operating at well under its full capacity; and**
 - b. **only includes the extra road traffic caused by air passengers and on-airport staff, and excludes the road traffic due to catalytic and induced employment.**²⁹
54. If we look at the situation when the airport was operating at full capacity there would be 95 million air passengers per year, 58 million more than at present. Assuming 12% would be transfer passengers, and that, as the consultation

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document suggests, 54% would use public transport (with 43% by rail, 46% by road and 11% by bus) that would indicate around 23 million air passengers using cars or taxis. That is 64,000 per day.

55. On top of that it is necessary to add car journeys by airport employees, plus journeys by workers in the new catalytic firms in the Gatwick area. Also the car journeys due to the induced jobs - with the airport more than twice as large as at present there will be twice as many workers in the local shops. Using our calculation (paragraph 42 above) of a total of 60,000 extra workers, and assuming 60% of them travel by road twice a day, gives 72,000 per day.
56. Adding together journeys by air passengers and workers gives a total number of road journeys (excluding buses and commercial) of 136,000 persons per day
57. If we then allow for more than one person per car, we reckon that there would be approximately 100,000 extra vehicles per day. On top of that would be the plethora of white vans and heavy goods vehicles generated by the activity of the new firms attracted to the area.
58. This huge increase would in due course require the widening of the M23 and M25. Moreover, the M23 would need to be extended into central London: at present it stops at Coulsdon, 13 miles south of central London. That would be extremely costly, but might not be necessary until around 2040. The cost is discussed in paragraphs 93-96 below.
59. An issue omitted from the consultation document is that the substantial increase in traffic would also put pressure on many A roads and local roads within 20 miles around the airport. Gatwick lacks any good road connections to the east or west. Many local roads through the neighbouring towns and villages would become congested with queues at junctions, making journeys to work or to school frustrating and time-consuming.
60. To deal with the extra traffic on the A roads and local roads would require many traffic engineering schemes which in many cases would cause damage to historic town and village centres, many of which have conservation area status. They would also put a substantial extra cost on West Sussex, East Sussex and Surrey County Councils. Gatwick have offered to contribute £10 million and West Sussex are asking for £30 million. In view of paragraph 53a above, we feel that £30 million is a sizeable underestimate.
61. Horley is the town most affected by non-motorway traffic access to Gatwick. Additional housing planned at Horley is expected to generate up to 5,000 more local vehicles over the next ten years and as these will mostly belong to younger families many of them will be on the local roads daily in peak times for school runs, local employment trips and access to the M23. Traffic created by a second runway would come on top of this.
62. A new runway would be likely to bring forward the need for step changes in a number of local towns. For example, a new bypass or tunnel might be needed at Reigate, at considerable cost and causing substantial environmental damage. A new western bypass around Crawley is considered necessary by the West Sussex County Council, resulting in more loss of countryside, and a further adverse impact on Ifield. **The consultation document shows that there is no space for this new road on the southern side of the new airport boundary without**

demolishing more houses, more business premises, and possibly the Hindu temple. This needs to be taken into account.

Rail over-crowding

63. The consultation document seriously underestimates the increase in rail traffic due to a second runway. This is because the assessment -
- a. is based on forecast rail traffic in 2030, when the new runway would be operating at well under its full capacity; and
 - b. only includes the extra rail traffic caused by air passengers and airport staff, and excludes the rail traffic due to catalytic and induced employment.³⁰
64. If instead, we look at the situation with the airport operating at full capacity, and take the consultation document target that 43% of air passengers use rail, that suggests 21.9 million extra rail passengers per year, or 60,000 per day. Using again the figure of 60,000 for total extra employment in the Gatwick area (airport employees + catalytic + induced), and assuming 40% use public transport, say 15% bus and 25% by rail, twice a day, gives a total of around 30,000 per day.
65. Thus when Gatwick reaches full capacity on two runways there would be on average around 90,000 extra journeys every day in the vicinity of the airport.
66. We accept the argument advanced by GAL that much of the flow of passengers to and from the airport tends not to be at commuter rush-hours. But that would not apply to journeys by the workers in the new firms attracted to the area.
67. We are surprised that the consultation document accepts GAL's contention that no new investments in railway infrastructure would be required other than those already planned. The new investment is needed merely to cope with the rise in the number of passengers on the Brighton main line without a second runway.
68. It is disingenuous for the consultation document to claim the benefit for the nation of a new runway operating at full capacity, while assessing the road and rail implications when the new runway is only half full.
69. With Gatwick at operating at full capacity extremely costly infrastructure works would be required. The Airports Commission's Surface Access report indicates that:
- 'Further options would involve a more significant investment in infrastructure. The delivery of a new rail tunnel from the Purley area into (and potentially through) central London incorporating an underground station at Croydon would constitute a major infrastructure project requiring significant national investment. Another infrastructure-led option identified is double-decking, although with limited capacity available in the terminating platforms at London Bridge, this is likely to involve extensive gauge clearance works covering the Thameslink tunnels and routes north of London as well as the widening of the Balcombe and Clayton tunnels south of Gatwick. These schemes would not only be very expensive but also involve extensive disruption to network operations during construction.'*³¹
70. The cost of such construction should be added to the cost of the Gatwick runway plans. It would make the cost of putting the M25 into a tunnel at

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Heathrow look small by comparison (see paragraphs 91-96).

71. The fact that Gatwick is only served by one motorway and one railway line makes it susceptible to any delays, whether caused by an accident or by congestion, both of which would be made more likely by the increased volume of road and rail traffic.

The Heritage

72. The destruction of listed buildings is a serious disadvantage of a new Gatwick runway. Nineteen listed buildings would be demolished. That includes five buildings classified as Grade 2*.³² These buildings are among the 6% most important buildings in Britain.
73. That would be an unprecedented loss of our heritage, of national significance. Indeed according to the Society for the Protection of Ancient Buildings, it would be the largest destruction of our heritage since the World War II blitz.³³ By comparison, the construction of HS2 would involve the destruction of only six listed buildings, including only one grade 2* building.
74. Ten more listed buildings would lie within 300 metres of the new runway.³⁴ The new runway would have a severe impact on the Ifield Conservation Area which includes a number of listed buildings and a 13th century church listed grade 1.³⁵



Rowley. A 15C manor house, listed grade 2*. One of 19 listed buildings that would be demolished.

75. GAL has suggested that some of the listed buildings might be moved and re-erected elsewhere. That would be a difficult, costly and lengthy process. We doubt if it could be achieved within the GAL target timescale of opening the new runway in 2025. If this suggestion is to be taken seriously it must be made a legal obligation, with the airport bearing the full cost.

Woodland, countryside and floods.

76. The Woodland Trust has expressed great concern that the new runway would involve the destruction of 14 hectares of ancient woodland. The Trust say that the runway 'plans continue to include fundamental misunderstandings about the ecological impact, as well as worrying ideas like 'offsetting' irreplaceable ancient woodland.'³⁶
77. We note that the airport plans also include destroying woodland on high ground outside the airport boundary at the western end of the runway. In total some 70 hectares of woodland would be lost.³⁷
78. Loss of countryside. The land where the new runway would be built is attractive, with important flora and fauna. It is described in a poignant paper prepared for GACC by naturalist David Bangs (on our website).³⁸
79. The main loss of countryside would be due to the need for massive new housing developments, and there would be a need to find land for associated retail and entertainment facilities, and also for new roads. There would be further loss of countryside for sites for the large number of new firms attracted to the area, and for the expansion of existing firms. And perhaps also for the most of the 286 displaced business premises.
80. Flooding. The statement in the consultation document that the risk of flooding 'would not be known until well into a detailed design period and possibly not until the airport was operational'³⁹ is astonishing, particularly with the predicted likelihood of an increasing number of extreme weather events this century. Severe flooding already occurs downstream from Gatwick, affecting Horley, Dorking and Leatherhead. That is bound to be made worse by the increased run-off from paved surfaces. **The cost of flood protection measures should be included.**

Pollution and Climate Change

81. Air Quality. We are glad that it is forecast that at Gatwick there would be no breach of the EU legal standards (set for busy city streets).⁴⁰ Nevertheless doubling the number of aircraft using Gatwick, plus the pollution from the extra car traffic and from the extra commercial vehicles, would undoubtedly result in a reduction in air quality for the communities around the airport. People who live in the country expect to be able to breathe clean air, not air which is slightly better than a busy city street.
82. Climate Change. The Airports Commission have concluded that one extra runway in the South East would be consistent with the Climate Change Act although this is disputed by the RSPB, Greenpeace, Friends of the Earth, WWF and other environmental organisations.⁴¹
83. The conclusion that a new runway would be compatible with the Act - as reflected in the carbon-capped and carbon-traded models - is dependent on three crucial assumptions:
- a. that the rest of UK industry can achieve an 85% reduction in CO₂ emissions;
 - b. that any substantial expansion at other UK airports is ruled out; and

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- c. that scientists confirm that the non-CO2 pollution from aircraft emissions at high altitude does not have any additional damaging effect.⁴²

84. These uncertain assumptions are a doubtful basis on which to proceed. The possibility that full use of the runway may in future be ruled out on climate change grounds should be recognised in the risk and optimism estimates. We would suggest that the allowance for optimism should be increased by 20% of the £9 billion total cost to allow for the very real risk that any one of the three crucial assumptions listed above may come unstuck (see paragraphs 91-96).

Economic benefits

85. The consultation document suggests that - over a 60 year period - a new runway at Gatwick could benefit the UK economy by £42-127 billion.⁴³ A new runway at Heathrow would, however, produce roughly twice as much economic benefit, estimated at £112-211 billion.⁴⁴

86. A new runway at Gatwick would, however, also have serious adverse economic effects. It would increase the North-South divide, would create more employment in the South East adding to the pressure on all aspects of the infrastructure, and would leave the North suffering the costs of decline. It would do nothing to assist a 'Northern Powerhouse' as envisaged recently by the Chancellor of the Exchequer.

87. It is nonsense planning for the UK's largest airport to be located south of London. The forecasts show that (in some scenarios) building a second runway at Gatwick could result in the 'migration of flights from Stansted and Luton to Gatwick'.⁴⁵ It would be ridiculous to concentrate even more activity in the most over-crowded corner of England, with even more traffic on the M25.

88. At a local level the predicted economic benefits would largely accrue to the additional labour force at the airport, in new jobs related to the airport or to the staff of new firms moving into the area. To the extent that the benefit would go mainly to people who move into the area, there will be few benefits to existing residents. Moreover, we consider that the Quality of Life assessment by the Commission is flawed because it does not take fully into account that in any one year only about 50% of the UK population fly; and that most flights are taken by those in the higher income groups. And that those who do not fly, mainly the infirm, the poor and families with children, are discriminated against (and thus have their quality of life diminished) by having to pay VAT on their purchases and petrol and holidays while those who fly pay no VAT on air fares and no duty on aviation fuel (only partly balanced by air passenger duty).

89. A paper recently published by GACC, *Bad for Business*, shows that a second runway would create many problems for local firms as a result of labour shortages, higher costs, traffic congestion, and the impact of noise on rural businesses.⁴⁶

90. The argument that a second runway at Gatwick would increase competition is bogus. Gatwick with one runway, plus a rejuvenated Stansted, plus Luton, plus City, plus Amsterdam, plus Paris will provide plenty of competition for Heathrow. Indeed Gatwick would provide more competition if it is not burdened with higher airport charges due to the cost of a second runway.

Higher Cost

91. The consultation document estimated that the cost of building a new Gatwick runway would be up to £9.3 billion.⁴⁷ However, the Commission's new paper - *Cost and revenue identification: Gatwick Airport second runway* published on 22 January 2015 suggests that the cost could be as high as £10.7 billion.
92. To meet criticism by the Commission, GAL have now agreed to bring forward the construction of the new terminal and rapid transit system. While this change will not increase the total cost, it will increase the difficulty of raising the initial finance for the project. The difficulty of raising finance will be increased by the opposition of almost all the local authorities, by the local Members of Parliament, and by easyJet and British Airways.
93. In this response we have identified various items where we consider that the cost of the Gatwick option has been under-estimated in the consultation document and in the *Cost and revenue identification* paper. In the table below we give very rough, back-of-an envelope estimates for the cost of these items. We emphasise that these are not precise estimates, merely informed guesses which may serve to demonstrate the order of magnitude by which the cost of the Gatwick runway option should be increased. The first column gives the reference to the relevant paragraph in this response; the second column gives the total cost; the third the amount that should be paid by Gatwick Airport Ltd; and the right hand column the approximate amount that might fall on the UK Exchequer and on the taxpayer.

Additional cost of the Gatwick runway option

	<i>Reference - paragraph</i>	<i>Cost approx. £ million</i>	<i>Attributable to GAL £ million</i>	<i>Cost to Exchequer £ million</i>
Larger earth bunds	12, 17, 19	0.1	0.1	
Double-decked car parks	51	0.5	0.5	
End-around taxiways		3.0	3.0	
Rapid transit system underground?				
Widening M23, M25	59	500	250	250
M23 extension into London	59	1,000	250	750
Local roads	61	60	60	
Underground station at East Croydon and rail tunnel to London	68-70	7,500		7,500
Listed buildings	75	19	19	
Flood protection works	80	5	5	
Optimism assessment increase due to climate change uncertainties	84	1,800	1,800	
Total extra cost		10,887	2,387	8,500

94. The largest item is the cost of a new underground station at East Croydon and new rail tunnel into London, as suggested (in the Commission's report on surface access) would be needed when Gatwick was operating at full capacity after 2040. We have put this in at £7.5 billion, half the cost of Crossrail.

Response from GACC

95. To the extent that the extra rail traffic was due to natural growth or to the catalytic or induced employment created by Gatwick expansion, the cost would fall on the Exchequer. To the extent that the traffic resulted from extra air passengers and extra airport staff after 2040, it should in theory be borne by Gatwick Airport Ltd. We accept, however, that it would be difficult to collect this money in advance, and therefore we have allocated the whole cost to be met by the taxpayer.
96. Our rough calculations indicate that the total cost of the Gatwick runway option might be around £20 billion compared to the £9.3 billion suggested in the consultation document. Before the Commission make any recommendation they should revise their estimates of the cost of the Gatwick option on the lines suggested above.
97. Higher fares. In order to pay the cost of a second runway, the consultation document states that passenger charges would rise from £9 at present to 'between £15 and £18, with peak charges up to £23.'⁴⁸ That is an average extra charge per return flight of £12 - £28 per head. It can be compared to the current level of air passenger duty of £13 per head per return flight to Europe - a tax that has been subjected to prolonged opposition from the aviation industry.
98. Higher charges at Gatwick would be joy for Stansted. The consultation document, however, states that the Commission forecasts do not take into account that the increased charges might cause some airlines or passengers to move to other airports.⁴⁹ **This is a major flaw in the business case for Gatwick.**
99. If passengers were to choose to use Stansted or other airports which did not have the cost of building a new runway, passenger numbers at Gatwick might be lower than forecast. That is what happened at Manchester: since the second runway was opened fifteen years ago passenger numbers have hardly increased. In that case charges at Gatwick would be even higher as the cost would need to be shared among fewer passengers.⁵⁰
100. In paragraph 93 above we calculate that the extra costs of a second runway that should be attributable to Gatwick would be around £2.4 billion, a 25% increase on the estimate made by the Commission. The two factors together - fewer passengers and higher costs - produce the result that airport charges might need to rise well above the figures suggested in the consultation.
101. It is thus not surprising that easyJet, Gatwick's largest airline, has submitted a powerful response supporting a new runway at Heathrow, and opposing a new runway at Gatwick.⁵¹
102. Willie Walsh, CEO of British Airways' parent company International Airlines Group, has said recently: 'I would not support a runway at Gatwick because I don't think there's a business case, and we would not be prepared as a significant operator there to see charges increase. I don't believe that demand is as strong as Gatwick would argue. We believe there are opportunities to continue to grow but we don't see a case for doubling the capacity at Gatwick in the near future - particularly if charges go up. That's not going to be an attractive environment for airlines.'⁵²

No risk of decline

103. Some local councils have been concerned that if a new runway were to be built at Heathrow, Gatwick might decline. However, easyJet, in their response, state: 'Gatwick is a much improved airport under its new owners and management team and easyJet is committed to continuing to grow our operations there.... It is important to note that our support for a new runway at Heathrow is not a vote against Gatwick. We will continue to grow our presence at Gatwick, and any operations at Heathrow would be additional to our services at Gatwick.'

A legal agreement ?

104. Gatwick Airport Ltd have given the Commission various undertakings. The local authorities are putting forward long lists of conditions that should be attached to any runway approval. And the public have been wooed with lavish promises of compensation. Foreign owned companies are, however, notorious for making promises which are then not fulfilled, for example Kraft in the takeover of Cadburys. We consider that no weight should be put on any undertakings unless they are incorporated into a legal agreement binding on any subsequent owners of Gatwick.⁵³
105. Ideally any legal agreement (for whichever runway option is chosen) should be agreed and signed before the Commission makes its recommendation: after the recommendation much of the bargaining power is lost. But in practice that would be difficult to arrange.
106. We suggest that, for whichever option is to be recommended, the Commission compile a list of all the obligations that should be included in a legal agreement. And we ask the Commission to recommend that the Airport should be required to sign the agreement before the Government announces its approval.

Replies to the Consultation Questions

We are shocked that there is no question on urbanisation and housing which is one of the main concerns at Gatwick. Many people and councils who may have wished to raise this matter will have been unable to do so. We provide our answers under 'Place' below.

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

The reasons why a second runway at Gatwick is unacceptable are set out in paragraph 5.

Q2. Any suggestions how the short-listed options could be improved?

Better earth bunds - see paragraphs 12, 15-17, and 19.

Q3. Comments on how the Commission has carried out its appraisal?

Welcome rational approach - see paragraph 3.

Failure to present case for no new runway - see paragraph 7.

Q4. Any relevant factors that have not been fully addressed?

Greater impact of noise in rural areas - see paragraph 9.

New houses under construction - see paragraph 14.

End-around taxiways - see paragraphs 29-30.

No scope for respite - see paragraph 21.

Response from GACC

Night flights - see paragraph 27.

Operational problems of terminals on 'wrong side' of runway - paragraphs 28-30.

Failure to take fully into account catalytic and induced jobs - see paragraph 35.

Disingenuous to assess the road and rail impacts when the new runway is only half full - see paragraph 68.

Failure to assess possibility that higher charges at Gatwick might cause passengers to use other airports - see paragraph 99.

Q5. Comments on specific topics?

Strategic fit.

A second runway at Gatwick is not wanted by airlines - see paragraphs 101 -102

Higher airport charges would not 'improve the experience of passengers' - see paragraphs 97 - 100.

A second Gatwick runway would worsen the north-south divide, and hence not maximise benefits for the UK - see paragraphs 86 -87.

Competition argument not valid - see paragraph 90.

Economy impacts -

Economic benefits of Gatwick runway half those for Heathrow - see paragraph 85.

Local economy impacts

Likely to be negative as many firms would suffer from shortage of labour and traffic congestion - see paragraphs 88- 89.

Surface access.

Need for new road infrastructure seriously underestimated - see paragraphs 51 - 62

Need for new rail infrastructure seriously underestimated - see paragraphs 63 - 71

Noise

Number affected would treble; noise in rural areas more annoying because of low background noise; new flight paths would cause distress and anger - see paragraphs 8 - 19.

Air quality

Would be worsened - see paragraph 81.

Biodiversity

Loss of ancient woodland and countryside - see paragraphs 76 - 79.

Carbon

Commission's assumptions are unreliable, and put runway plans in doubt - see paragraphs 82 -84.

Water and flood risk

Needs further examination - see paragraph 80.

Place

Consultation document at fault for excluding catalytic and induced jobs. Runway would create need for around 40,000 new houses and a need for many new business premises. Would urbanise a wide area around Gatwick - see paragraphs 31 - 50.

Quality of life

50% of the population don't fly and are discriminated against - see paragraph 88.

Quality of life would be made worse by increased noise - see paragraphs 8 - 27.

And made worse by traffic jams - see paragraphs 51 - 62.

And made worse by pressure on schools, doctors, hospitals, social services - see paragraphs 49 - 50.

Response from GACC

Community

Would be put under stress by in-migration of workers from elsewhere in the UK or from the EU - see paragraph 44.

Cost and Commercial viability

Increase in charges per passenger - see paragraphs 97 -100.

Raising finance difficult - see paragraph 92.

Operational Efficiency

Problems caused by two existing terminals on 'wrong side' of the runway - see paragraphs 28 -30.

Only one motorway and one railway line risk to resilience - see paragraph 71.

Operational risk

Resilience in bad weather. Parallel arrival flight paths only 1 km apart - see paragraphs 20-22.

Runway crossing risks - see paragraphs 28 - 30.

Delivery

Need for a legal agreement - see paragraphs 104 - 106

Q6. Comments on the sustainability assessments?

Economic growth and increased employment are not benefits if only achieved by the in-migration of labour - see paragraphs 32-33.

Q7. Comments on the business cases?

Additional costs of construction - see paragraphs 91-96.

Business case for Gatwick rejected by easyJet and British Airways - see paragraphs 100-101.

Q8. Any other comments

There have been many polls of public opinion on an extra Gatwick runway. We believe that the most important of these are the ones conducted by the airport at their series of exhibitions in April-May 2014 because those voting were provided with a clear indication of what they were voting for and exactly where it would be located. The results were:

- In favour of one new runway at Gatwick (sum of options 1,2 and 3) 1094
- Against a new runway at Gatwick 2165

Since that time attitudes against a Gatwick runway have hardened because of new flight paths.

References

¹ Sir Howard Davies. Public Evidence Session. Crawley 16 December 2014.

² See GACC response to the Commission discussion paper on noise.

³ At Gatwick, with a second runway, 13,200 people would fall within the 57 Leq contour. If they were all living in a rural area as GAL suggest, then the 57 Leq contour would be equivalent to the 67 Leq contour at Heathrow – which has 9,500 currently living within it. But note that GACC would not claim that this comparison is entirely accurate because not all the people affected at Gatwick live in rural areas.

⁴ Map in Airports Commission Consultation Document November 2014 paragraph 3.1.

⁵ Sir David Rowlands, former Chairman GAL. Speech to Gatwick Airport Consultative Committee January 2010

⁶ Airports Commission. Noise: Local Assessment. Chapter 3.2

⁷ A Second Runway for Gatwick GAL April 2014 page 49

⁸ A Second Runway for Gatwick GAL April 2014 page 28

⁹ A Second Runway for Gatwick GAL April 2014 page 27

¹⁰ At night it would be possible to use each runway on alternate nights, but GAL have promised Crawley Council that all night flights would use the existing runway.

¹¹ ICAO Annex 14 Vol 1

¹² https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/371854/14-operational-efficiency--airspace.pdf page 39

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- ¹³ Airports Commission Consultation Document November 2014 paragraph 3.1. A description of how End-Around Taxiways would work is given in A Second Runway for Gatwick. GAL. April 2014 pages 86-89.
- ¹⁴ Operational Efficiency: Ground Infrastructure page 9
- ¹⁵ A Second Runway for Gatwick. GAL. April 2014. Page 82
- ¹⁶ Gatwick Master Plan July 2012 paragraph 8.1.1
- ¹⁷ Airports Commission Consultation Document November 2014 paragraph 3.24
- ¹⁸ The Commission appear to have accepted this view. See Local Economy Impacts Assessment.
- ¹⁹ Letter to local residents December 2014
- ²⁰ Berkeley Hanover. PowerPoint presentation for West Sussex County Council. February 2013
- ²¹ Airports Commission. Local Economy Impacts: Assessment. Page 18 paragraph 1.1.1
- ²² If the new induced jobs were created in the same proportion to airport jobs as indicated in the 2012 Master Plan, this figure would be considerably higher. We have reduced it, however, as we suspect the 2012 figure was exaggerated by GAL for publicity purposes.
- ²³ Gatwick Airport Second Runway: Business Case and Sustainability Assessment. Airports Commission. November 2014. Paragraph 2.54
- ²⁴ Berkeley Hanover. Power Point presentation. February 2013
- ²⁵ Airports Commission Consultation Document November 2014 paragraph 3.25
- ²⁶ Banks, Bayliss and Glaister. RAC 2007
- ²⁷ Department for Transport. February 2014
- ²⁸ Airports Commission Consultation Document November 2014 paragraph 3.9
- ²⁹ Airports Commission: Surface Access: Gatwick Airport Second Runway.
- ³⁰ Airports Commission: Surface Access: Gatwick Airport Second Runway. Page 2
- ³¹ Airports Commission: Surface Access: Gatwick Airport Second Runway. Pages 6-7
- ³² A Second Runway for Gatwick GAL April 2014 page 52
- ³³ Information supplied by email 10 April 2014.
- ³⁴ Gatwick Airport Second Runway: Business Case and Sustainability Assessment. Airports Commission. November 2014. Paragraph 2.67
- ³⁵ <http://www.crawley.gov.uk/pw/web/int169915>
- ³⁶ Woodland Trust website
- ³⁷ Gatwick Airport Second Runway: Business Case and Sustainability Assessment. Airports Commission. November 2014. Paragraph 2.45
- ³⁸ The Best of the Low Weald. David Bangs. July 2014. www.gacc.org.uk/the-runway-issue Scroll to Wildlife and Landscape Experts ...
- ³⁹ Airports Commission. Gatwick Sustainability Assessment paragraph 13.5
- ⁴⁰ See <http://www.gacc.org.uk/resources/NGO%20%20September%202014.pdf>
- ⁴¹ <http://www.gacc.org.uk/resources/NGO%20manifesto%20September%202014.pdf>
- ⁴² See Aviation Environment Federation. <http://www.aef.org.uk/>
- ⁴³ Airports Commission Consultation Document November 2014 paragraph 3.23
- ⁴⁴ Airports Commission Consultation Document November 2014 paragraph 3.128
- ⁴⁵ Airports Commission. Gatwick Sustainability Assessment paragraph 1.45 third bullet point
- ⁴⁶ Bad for Business. www.gacc.org.uk/latest-news
- ⁴⁷ Airports Commission Consultation Document November 2014 paragraphs 3.48 and 3.52
- ⁴⁸ Airports Commission Consultation Document November 2014 paragraph 3.41
- ⁴⁹ Airports Commission Consultation Document November 2014 paragraph 2.26
- ⁵⁰ For a fuller exposition of this case see <http://www.aef.org.uk/2014/03/10/new-report-highlights-a-new-runway-at-heathrow-or-gatwick-would-mean-big-increases-in-passenger-fees/>
- ⁵¹ <http://corporate.easyjet.com/~media/Files/E/Easyjet-Plc-V2/pdf/about-easyjet/easyJet-response-to-the-airports-commission-consultation-jan2015.pdf>
- ⁵² The Guardian 31 October 2014
- ⁵³ For details see GACC submission to the Commission. <http://www.gacc.org.uk/latest-news.php> scroll to 'Can we trust Gatwick to keep their promises.'