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Sir Howard Davies  
Airports Commission  
6th Floor, Sanctuary Buildings  
20 Great Smith Street  
London SW1P 3BT

Dear Sir Howard,

I am writing to the Commission to raise my concerns regarding existing analysis of the impact of the proposed new runway at Gatwick Airport, and outline what appear to me and others too to be serious inadequacies in the analysis so far performed by the Airports Commission. I live outside Speldhurst, which is directly beneath the area where aircraft turn to join the final runway approach. We are already severely affected by aircraft noise; yet we fall outside the area that is considered in your existing analysis of noise impact. I believe that other aspects of the analysis performed so far are also inadequate, in relation to the mismatch between the time-frame of assessments of costs and benefits, and also the geographic mismatch between potential costs and benefits.

#### Noise – Evidence of Inadequate Analysis

The Leq measure of noise disturbance does not give a realistic assessment of the overall impact of the GAL proposal. Taking background noise levels into account, the difference in the level of disturbance at Gatwick compared to Heathrow is less marked than the Leq analysis suggests. Leq does not measure annoyance. *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. If that difference was taken into account as it should be, then all rural land within the 44 Leq boundary should be given consideration on a par with urban land within the 54 Leq boundary.*

We live close to Speldhurst. Aircraft turn here while descending to join the final descent path. Sometimes this manoeuvre is performed in a sedate way, but not infrequently it is performed in what appears from the ground to be a violent fashion. Gatwick responds to complaints by claiming that 'nothing unusual occurred'; but on the ground the difference is palpable. No doubt engine type and pilot choice has an impact, along with wind and other factors. Against a background of birdsong, the noise aircraft make when descending and turning sharply can be not merely disturbing, but distressing. In the summer, we have frequently been woken in the depths of the night by aeroplanes. Technically there is a restriction on noisier aeroplanes landing at night, but from our position on the ground I would say this restriction does not appear to be working as it is supposed to. When it is too hot to sleep with the windows closed, we are put in an unpleasant dilemma ; with the windows open, we will be woken by planes at odd hours of the night; with them closed we will suffocate. We live many miles from the airport. *Indeed, we live so far away that we do not appear in the Airport Commission's noise analysis. Yet aircraft noise is a huge concern for people who live in the Speldhurst and Penshurst areas.* As far as I am aware, serious analysis of the noise impact here has not yet been performed.

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 each year in search of peace and tranquillity. Local councils have a statutory duty to conserve and enhance the natural beauty of these areas. *As residents of the High Weald AONB, if the GAL's proposed new runway is built, we would be in the ludicrous position of having our right to extend our houses or put up a chicken coop restricted in order to preserve the character and beauty of the area for everyone to enjoy, while jumbo-jets whine and roar overhead at the rate of up to two per minute. We believe the AONB restrictions are entirely justified by the quality and character of the local landscape. But the Gatwick Airport extension plan is wholly inconsistent with the AONB designation. Indeed, current levels of activity at Gatwick Airport already do a considerable amount of harm to the environment, undermining the beneficial effect of the AONB legislation. As the south east becomes more crowded, the oases represented by the AONBs will be even more important to people across the region.*

With both runways handling arrivals and departures, there can be no respite scheme, such as operates at Heathrow.

*In my experience and that of other local residents in my area, GACC are wholly correct in their assertion that disturbance from new flight paths would be far greater than is measured by conventional Leq or Lden metrics, and would extend for 20 miles from the airport. If a decision is made on the basis of the Leq analysis, it will be flawed. A major impact is being misrepresented by this process, through inadequate analysis.*

Even on the basis of the Leq analysis, some of the implications of a second runway at Gatwick are atrocious for local residents. Because the runway is so close to Crawley, 20 churches, and 31 schools and nurseries would fall within the 54 Leq contour. There is evidence that aircraft noise can have an adverse effect on children's health and learning.

#### Regional Over-Development

There is no shortage of jobs in the Gatwick area. There is however a shortage of affordable housing, and a tremendous amount of congestion on the roads.

A full-capacity two-runway Gatwick is forecast to handle 96 million passengers a year, compared to 38 million at present. This would make it substantially larger than Heathrow at present. The enlarged terminal would handle 50 million passengers a year compared to 35 million for Heathrow T5. Upper end forecasts would see Gatwick grown as large as any current airport in the world. This in the centre of an AONB, countryside that provides amenity to millions and attracts large amounts of tourism.

#### Jobs without Workers – Evidence of Inadequate Analysis

The Airports Commission suggests a second runway would increase the number of airport jobs in 2050 to between 7,900 and 32,600. But these estimates do not include the number of jobs created in firms attracted to the area by the new airport, nor do they include induced jobs, created by the extra money in the local economy. A more realistic estimate produced by GACC is 60,000.

Realistically, these low-skilled, low-paid jobs could only be filled by inward migration, perhaps from other parts of the EU. West Sussex County Council has concluded that the new jobs created would necessitate 30,000 – 45,000 new houses, equivalent to a town the size of Crawley.

The Airports Commission estimate of 18,400 new houses is based on an estimate of new jobs that is too low. A realistic estimate is more than double this number. The green belt and the AONB make such development fraught with difficulty. The increased pressure on housing would be a huge problem for the area. Crawley already has almost 3000 people on its housing waiting list. Medical services, schools, and social services would come under intolerable pressure. Meanwhile, 286 existing business premises would be demolished, creating a need for alternative premises, and perhaps destroying existing high quality jobs.

#### Cars without Roads, Rail Passengers Without Trains --Evidence of Inadequate Analysis

The Commission's impact analysis goes out to 2030. It would be far more appropriate to assess the impact at the point at which the airport reaches full capacity, which is the point at which the benefits have been discussed. This discrepancy seriously vitiates the entire analysis.

By analogy, if one analyses the costs and benefits of taking up smoking, the picture looks very different after 5 years, when the body is relatively able to cope with the various irritants and poisons tobacco introduces to the body, to the way looks 25 years down the line, when the body's ability to cope is waning. Of course it is the shorter-term analysis that makes smoking seem like a reasonable choice to young people. The appearance is deceptive. Anyone capable of performing the longer term analysis and holding the results in their mind is unlikely to take up smoking. Those who refuse to see the full-term picture are normally regarded as deceiving themselves.

The Commission may believe that there are too many imponderables to allow for an analysis that goes out 40 years. And so would the young person who is attracted to the short term benefits of tobacco. They would be wrong. Elasticity in the carrying capacity of the environment is no more infinite than elasticity in the body's capacity to deal with exposure to harmful substances. The reality is that the processes that are being set in chain are entirely predictable. Gatwick airport will lead to drastic over-development of a site in the heart of some of England's most beautiful countryside, protected as part of two AONBs – a status which is regarded as equal for conservation purposes to that of a National Park – and enjoyed by £2m people annually, who go there in search of the quiet beauty of unspoiled countryside.

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. Already the M25 is frequently brought to a standstill by traffic, as is the M23 near Gatwick. GACC analysis shows that we an enlarged Gatwick would result in an extra 100,000 road journeys a day. Apart from the M23, there are no good road connections to Gatwick. The resulting pressure on inadequate and already over-used A-roads will be a cause of misery and danger to local residents.

The Airports Commission has accepted GAL's contention that this increased traffic will be handled by on-going improvements to the M23 and M25. But those improvements are required to deal with the increase in traffic that is forecast *without* a new runway. So the existing analysis of the implications on traffic is inadequate. It does not account for catalytic and induced employment, and it only goes out to 2030. Many of our lives however will go out rather further than that.

A realistic assessment of the changes that will be necessary to deal with such a large increase in traffic should take account of the likely impact on the countryside, and many historic towns and villages in the area.

## Rail Over-crowding

The Commission is wrong to accept GAL's argument that no new investment in rail infrastructure is required other than what is currently planned. No account has been taken of the workers who will have to commute to the area. With no new runway, Network Rail forecasts a 30% rise in rail passengers between 2010 and 2020. Crowding at London Bridge is already sufficient to cause constant delays in commuter services on the Tonbridge line. The proposed Gatwick second runway will put considerable additional strain on a rail terminal that is already struggling. The Commission's own Surface Access report states that at full capacity:

*'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.'*

## Destruction of Heritage and Countryside – Inadequate Analysis

According to the Society for the Protection of Ancient Buildings, the direct destruction of 19 listed buildings that would be necessitated by the construction of a second runway at Gatwick would be the largest destruction of significant historical buildings since the blitz of World War II. By comparison, construction of HS2 would involve the destruction of six listed buildings. Ten more listed buildings lie within 300 m of the runway.

14 Hectares of ancient woodland will be lost. Ancient woodland cannot be replaced by new planting and cannot be 'offset' as runway plans suggest.

This is only the direct destruction, and does not take into account the knock-on impact that will take place due to the necessary development of housing and transport infrastructure. Again, the analysis has not gone far enough into the predictable impacts.

## Flooding Risk – Absence of Analysis

The Commission states that the risk of flooding 'would not be known until well into a detailed design period and possibly not until the airport was operational'. This analysis is inadequate, given the predicted likelihood of an increasing number of extreme weather events this century.

## Climate Change

The Airports Commission has stated that one extra runway in the South East would be consistent with the Climate Change Act. RSPB, Greenpeace, Friends of the Earth, WWF and other environmental organisations believe that this conclusion is mistaken. Have their arguments been answered?

### Economic Benefit/Cost Mismatch

Any cost-benefit analysis should be consistent as regards time, and explicit in regards to who benefits and who stumps up the costs.

The Commission has suggested that over a 60 year period a new runway at Gatwick could benefit the UK economy by £42 - 127 billion. As with the smoker's analysis of the costs and benefits of smoking, assessment of the costs does not go out as far in time as the assessment of the benefits.

A new runway at Gatwick would have severe adverse economic impacts, which have not properly been taken into account. The pressure on all aspects of infrastructure in a rural location that is dominated by green belt and AONB land is not suited to the kind of development – new housing, new roads, new businesses, new social services -- that will be necessary to cope with the increased economic activity. This development is likely to be particularly expensive due to the sensitive area of many sites, it is likely to be particularly concentrated due to the fact that much of the land cannot be developed under current legislation, and much of the cost is likely to fall to local councils and therefore local residents to fund. But the economic *benefits* are not going to the local area, which has no shortage of jobs. Indeed one possible impact of the development is the loss of high-quality jobs and their replacement with low-quality jobs.

GACC has published an analysis showing that a second runway at Gatwick would create problems for local firms, labour shortages, higher costs, congestion, and problems related to noise-impact on rural businesses.

By locating new airport capacity not just in the South of England but well to the south of London, Development of Gatwick will increase the north-south divide as much as it is possible to do. The Commission's own forecasts show that building a second runway will in some scenarios result in the migration of flights from Stanstead and Luton to Gatwick. So more activity will be concentrated in the most overcrowded corner of England, right in the heart of one of its most sensitive areas. Coupled with the fact that the Commission's infrastructure analysis stops peremptorily 5 years into the adventure, this is surely inviting the most perverse outcomes!

### Business Case Flawed

There is ample evidence of flawed analysis in GAL's business case.

The new terminal is to be designed to handle 50 million passengers a year, making it larger than the two existing Gatwick terminals combined. But the Commission comment that there would be less space per passenger than in the existing terminals. The Airports Commission estimates that the cost of building a new Gatwick runway would be up to £9.3 billion. That is higher than GAL's estimate of £7.4 billion.

Gatwick Airport expansion is an expensive option for passengers. Carolyn McCall, Chief Executive of EasyJet, has commented that EasyJet is "quite concerned" at the prospect that Gatwick landing charges could rise to cover the costs of a second runway. "We make £8 profit per seat and our average price is just £60," she said. If Gatwick's charges doubled to an average of £15 to £18, "that is quite worrying in terms of our economic case"

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

The credit ratings agency Moody's is reported as seeing little merit in GAL's plans:

*"Moody's expects that Gatwick will be more vulnerable to competition if Heathrow were to build a new runway as it would be at risk of losing scheduled airline traffic to Heathrow, where carriers can typically earn more per passenger mile. Conversely, the construction of a Gatwick runway would almost double aeronautical charges at the airport, putting it at a huge competitive disadvantage to Stansted, which is its main competitor in the low-cost airlines segment."*

### Conclusion

In my view, while there is no case for expansion of airport capacity in the south of England, there is even less of a case for expansion at Gatwick than elsewhere, since development at Gatwick has the maximum adverse impact on protected environments that millions of people rely on in order to get away from the increasingly hectic and noisy nature of life in the south-east of England.

Assuming that aviation is kept within its climate change limit, Stansted, Luton and Birmingham are not forecast to be full until the late 2040s. The development of larger aircraft may eventually obviate the perceived need for more runways.

In closing, I have to say that it seems a matter of the greatest concern that Gatwick Airport Ltd. has presented so much misleading information in the process of lobbying in support of its proposals. Gatwick Airport is surrounded by precious countryside, largely protected with AONB status. It seems to me that GAL is not fit to run an airport, let alone be responsible for what is likely to be the largest single expansion of airport capacity in UK history.

Yours sincerely,

