[redacted]

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

In view of its impact on the quality of life for residents i.e. road congestion, need for additional housing in already densely populated urban areas, noise impact on previous peaceful rural communities and increased pollution, a second runway at Gatwick is deemed to be unacceptable.

Which of the shortlisted runway options, if any, do your comment(s) relate to?

Gatwick Second Runway

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

If a second runway were to be built, the consequence would be an enormous impact on the need for further hospitals, schools, housing, road and rail infrastructure, health care, etc. A substantial proportion of the costs of providing these services should be borne by the airport.

The assessment should give far greater weight and recognition to the impact of aircraft noise in rural areas. In many cases, home-owners have deliberately chosen to live in a rural environment to avoid the noise and bustle of the town. Now such rural tranquility is to be destroyed with little in the way of compensation for lost quality of life or reduced property prices.

GAL is incorrect in claiming that a major advantage of Gatwick compared to Heathrow is that, because the approach and take-off paths would be mainly over rural areas, comparatively few people would be affected. We are glad that the Commission recognise 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.' Many rural businesses require a high level of tranquillity.

Indeed 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 usual simplistic Leq figures. Leq measures noise but 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 10dB is taken into account, the difference between Gatwick and Heathrow is less marked.

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 each year in search of peace and tranquillity. Local councils have a statutory duty to conserve and enhance the natural beauty of these areas, and this applies to any decisions they may take, not merely to

planning applications.

Gatwick Airport Ltd have made 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 legally binding agreement. We would encourage the Commission in their stated aim to give serious attention to this issue.

A new earth bund is shown on the south west corner of the enlarged airport, and this is welcome. It would, however, only be relevant to the 25% of flights taking off towards the east, when it would reduce engine noise at the start of the run. No visual or acoustic protection is shown to protect residents in the eastern part of Langley Green. It is suggested that the earth bund must be continued all the way to the old A23.

Ifield, with its historic church (grade1) and attractive Conservation Area would be badly affected by ground noise. We submit that it would be essential that the earth bund shown on the plans is at least 15m high.

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. We are glad to see that the map published by the Commission now includes a new bund around the north west of the airport. However, we submit that to provide the minimum visual and acoustic protection needed this would need to be over 15m in height.

Which of the shortlisted runway options, if any, do your comment(s) relate to?

Gatwick Second Runway

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

We welcome the methodical, detailed and rational approach adopted by the Commission, and we are glad that the Commission has quality-checked the sometimes over-optimistic figures used by Gatwick Airport Ltd (GAL). In a colossal advertising, publicity and lobbying campaign, the new runway has been sold to the public as an entirely positive development. When the detail is unpicked, however, the reality is not quite as presented in the marketing campaign.

The Commission is asking for points on which their analysis may be incorrect or which they may have overlooked. We have picked identified a number of such points and have included them in these comments.

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

A second runway at Gatwick would cause unacceptable environmental damage, and would irrevocably change the character of Surrey, Sussex and Kent. Nevertheless Chailey Parish Council does not support a new runway at Heathrow either. We recognise that it, too, would do great environmental damage.

If all three options under consideration at Heathrow and Gatwick have unacceptable disadvantages, the conclusion will be for policy makers to look again more carefully at the option of 'no new runway'. The case for this option has been cogently argued by many national environmental organisations.

As in the past, the trend towards use of larger aircraft may make any new runway unnecessary. Assuming that aviation is kept within its climate change limit, Stansted, Luton and Birmingham are not forecast to be full until the late 2040s. All the national environmental organisations believe that it makes sense to use existing airport capacity before building any new runway, and this is a view that we would support.

Q5 Do you wish to comment on how the Commission has appraised specific topics (as defined by the Commission's 16 appraisal modules), including methodology and results?

Strategic fit

Not Wanted by Airlines:

Airlines do not want a second runway at Gatwick. 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."

Similarly, 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.'

No improvement in passenger experience:

We note that in most future scenarios explored by the Commission, 'Gatwick [with a new runway] remains mainly focused on the short-haul market …' Thus there would be no wide choice of long haul destinations.

The new terminal, which features large in many of the advertisements, 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 Commission consultation states that 'The airport has designed its expansion plans to be delivered in phases, with the initial phase including only the new runway, together with additional pier capacity linked to the existing terminals by bus, and the construction of the new terminal beginning at a later point. … The Commission considers that [this] may produce a worse passenger experience than is currently the norm at Gatwick.'

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. In order to pay the cost of a second runway, the Commission states that passenger charges would rise from £9 at present to 'between £15 and £18, with peak charges up to £23.' 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.

We note that the Commission has not apparently taken into account that the increased charges might cause some airlines or passengers to move to other airports. If they did, the charges at Gatwick would need to be higher still as the cost would need to be shared among fewer passengers.

North-South Divide Worsened:

We submit that a new runway at Gatwick would 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.

The Commission 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'. It would be ridiculous to concentrate even more activity in the most over-crowded corner of England, with even more traffic on the M25.

Which of the shortlisted runway options, if any, do your comment(s) relate to?

Gatwick Second Runway

Economy impacts

The Commission has suggested that – over a 60 year period
a new runway at Gatwick could benefit the UK economy by £42-127 billion. A new runway at Heathrow would, however, produce roughly twice as much economic benefit, estimated at £112-211 billion. We submit that 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.

The Commission 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'. It would be ridiculous to concentrate even more activity in the most over-crowded corner of England, with even more traffic on the M25.

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.

Which of the shortlisted runway options, if any, do your comment(s) relate to?

Gatwick Second Runway

Local economy impacts

An important objective set out by the Airports Commission is: 'To maximise economic benefits…..To promote employment and economic growth in the local area….To produce positive outcomes for local communities and the local economy'. However we challenge the assertion by Gatwick Airport Ltd (GAL) that a second runway would be supportive of this objective.

By engaging with opinion from local business communities, and taking a less selective view of the evidence, it may be concluded that the proposal would be detrimental for local businesses, the local economy and the community as a whole.

According to the Office of National Statistics there are over 30,000 businesses in West Sussex. The majority are located in the north of the county, in the vicinity of Gatwick Airport. Surrey has 61,900 businesses but with less concentration around Gatwick. It would be a reasonable assumption to say that there must be around 30,000 businesses in the Gatwick area.

West Sussex County Council and Crawley Borough Council commissioned a survey of West Sussex businesses in May 2013. It showed that only 31% of firms had employees who ever took a flight for business reasons. Only 4% felt air travel was important ‘for bringing overseas customers to your organisation.’

51% of firms agreed that there is a need for new runway capacity in the South East, and 52% favoured a new runway at Gatwick. Those were the ‘headline results’ that were used to influence the vote by West Sussex County Council to support a second runway. But the survey (and the vote) was before the full scale and implications of making Gatwick bigger than Heathrow were generally recognised. Nevertheless 24% of businessmen considered that Gatwick expansion ‘would dramatically affect local home (sic) and countryside’ and 23% felt it would ‘cause too much air and noise pollution’. That is confirmed in a letter from a Director of a leading Sussex company:

"Established for over 150 years, we are a major international business that owns three of the world’s leading brands and employs over 100 people locally.
Many of our employees have already complained of the increase in aircraft noise, particularly at night and at weekends and we are most concerned at the impact in future of a second runway at Gatwick on this. Worsening aircraft noise is not only affecting them personally and potentially the value of their houses but also their leisure time; whereby some of their favourite spots for peaceful relaxation are now blighted by aircraft noise. I suspect this will also have a negative impact on the leisure industry in the area."

According to Gatwick Airport (May 2014) a new runway would create 122,000 new jobs in the South East. The Airports Commission (November 2014) puts the figure at up to 90,000 by 2060. Although it is said that these new jobs would be spread across the South East, inevitably most would be concentrated in or around the Gatwick area.

A report by Optimal Economics commissioned by Gatwick Airport points out that: ‘Within the Gatwick Diamond, there is a projected excess of employment over resident labour supply throughout the forecast period.’ Gatwick Airport, however, blithely ignore the labour shortage warnings highlighted by their own economists; it is inevitable, that as unemployment across the area remains low, the result will be a chronic shortage of labour. That situation is likely to put many local firms at a serious disadvantage.

[redacted], a former manager for Royal Mail, writes:

"My experience showed that there was a constant recruitment problem for what is now referred to as the Gatwick Diamond. Not only did the churn effect of staff turnover lead to inefficiencies, but a constant high vacancy level led to increased costs through overtime pay, as well as poor quality of service. It was only through offering high overtime levels, and a variety of bonus payments, that the business could attempt to compete on pay with the airport
but effectively fail in doing so.

The [Airports Commission consultation document] recognises that there is no local pool of unemployment to draw on, but does not admit that the Gatwick Diamond has a history of being an "employment hotspot" (albeit disguised by the recent recession), and is already dependent on an immigrant workforce. It is arguable that the current reliance on an EU migrant workforce will be put under further strain given the current political situation."

Shortage of labour would tend to push up rates of pay, again causing difficulties for local firms. The Managing Director of an advanced technology company located close to Gatwick has said:

"Such a shortage of labour will inevitably create a price war and wages will sky rocket in an already very expensive area. Companies operating in a very competitive global market will be substantially disadvantaged."

[redacted] makes a similar point:

"The most probable outcomes
and track records should demonstrate this
is that labour intensive small businesses will need to compete on wage price, which will impact their profitability and may threaten their commercial viability. For labour intensive Public Service infrastructure, in addition to the Royal Mail, we should also look at local government, health service, some transport and other government agency organisations, who will not be able to compete for wages, and therefore experience churn and vacancy levels which will impact on the quality of service they provide to the local social and business communities."

The main effect of the creation of so many new jobs would be to draw in people from other parts of the UK and from the EU. That is welcomed by some firms because it would mean a bigger market for local shops, hotels, guest houses, taxis, etc. They may, however, not have realised that it would also cause an influx of new shops, new hotels, new taxi firms etc.; meaning in turn more competition, and could result in local firms being put out of business.

Consultants commissioned by the Gatwick Diamond Initiative and the West Sussex County Council estimated that there would be a need for around 40,000 new houses. The Airports Commission however use a lower figure. A large number of new houses would be good business for house building firms, but how many new building firms would move into the area? Would it mean better jobs for local building workers or would most of the new jobs be filled by transient labour from elsewhere?

It has been estimated that a second runway would mean around 136,000 extra road journeys a day in the vicinity of Gatwick. That is just for air passengers, and travel to work by airport employees and journeys to work of employees of new firms. In addition there would be all the extra commercial traffic generated by the larger airport and all the new firms. The result would be

delays at many road junctions. Longer journey times both for staff and for deliveries would have an adverse effect on local firms.

For rail services, no improvements are planned other than those already in hand to cope with the forecast growth in demand without a new runway. The result will inevitably be serious overcrowding.

[redacted] the owner of a small business near Gatwick, has written to say:

"I am very concerned that a second runway would create intolerable pressure on our local roads as there has been no definitive plan for the expansion of the road network that will be needed for at least a ten mile radius of Gatwick. If the planned passenger traffic (oh, and allied traffic such as people going to work) is achieved then there is simply no way that the current one motorway (and that is fed by the M25 from one end and that can't cope at the moment so God only knows how it will cope with not only the increase in Gatwick traffic but the annual increase that we see year on year) and single carriageway A roads such as the A272, A25, A29, A264 from East Grinstead and A22 will be able to cope, it's bad enough now. The other dual carriageway roads such as the A24/A264 and A21 will also be clogged with traffic. If the powers that be seriously believe that they are going to fit the traffic that currently surrounds Heathrow and duplicate it into the roads that surround Gatwick then someone needs their head examining. It is a joke and the amount of destruction of the green belt to accommodate this expansion and all the add-ons such as housing and industrial estates is bordering on criminal."

The construction of the new runway would involve the demolition of 286 business premises, including City Place (head office of Nestlé) and part of Manor Royal. 286 firms would have all the expense and hassle of having to re-locate. Gatwick Airport have suggested that some firms might be accommodated on land that they would acquire between the airport and the M23 – but that to make sufficient space available, the airport car parks would need to be double decked. So the land would not come cheap. And many firms would not wish to become tenants of Gatwick Airport Ltd. If firms wished to move elsewhere, there might be problems getting planning permission.

The managing director of the advanced technology company again:

"Some businesses will need to be relocated. Mine for instance could be a prime candidate. The disruption will be immense. The land proposed for a new facility is rather inappropriate, being directly under the flight path with all that entails. No discussion of time scale or compensation has been started so we are in horrible 'planners blight limbo' with no apparent end in sight. With current planning rules any new building would likely be seriously affected by lack of parking space, making it less attractive for people to work here. We own our current site, the ownership status of the new place is unknown.

In short the expanded airport will be bad for the majority of pre-existing businesses and people

that are already established here. The big winners will be the Airport itself, owned by a conglomeration of overseas investment companies who have only been in situ since 2009 and I understand are likely to sell out soon after the decision re the new runway. We have been here since 1963 and intend to remain."

Many rural businesses depend for their success on peace and tranquillity. A prime example is Hever Castle, birthplace of Anne Boleyn. Hever Castle supports up to 280 jobs in season. The castle's chief executive [redacted]: 'When people come to rural attractions they are expecting a degree of peace and tranquillity. We believe that a second runway would almost certainly spell the end for Hever Castle as a visitor attraction.'

The same is true for many rural businesses, for example quiet country hotels, film making enterprises, country parks and other outdoor visitor attractions.

A worse environment is worse for business. Surrey, Sussex and Kent are pleasant places to live. But if the environment is worsened by aircraft noise, by urbanisation, and by traffic congestion, it will become harder to recruit and keep high quality staff. A professional communications expert based at Haywards Heath, has written to say:

"The opening of the new headquarters and warehouse for a global component service provider to the aviation industry in Sayers Common 20 miles from the airport is perhaps a portent of what is to come, especially should a second runway be approved for Gatwick."

The immediate Crawley catchment area is now bursting at the seams as it tries to accommodate the burgeoning airline businesses that Gatwick needs to support it. Some companies have become well-established across East Sussex, West Sussex and Surrey and provide welcome local employment. But increasingly they are being forced further and further from the airport. These remoter locations are inevitably less convenient operationally. Company round-the-clock activities and staff movements significantly add to the traffic on the local roads that were never designed to take it.

Which of the shortlisted runway options, if any, do your comment(s) relate to?

Gatwick Second Runway

Surface access

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 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%. A calculation of the number of air passengers due to travel by road plus airport employees plus the employees in new firms attracted

to the area shows that the number of extra road journeys would be around 100,000 vehicles a 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.

This huge increase would put pressure not only on the M23 and M25, and but also 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. Yet the Commission only lists a few minor road improvements within a mile or so of the airport. Otherwise the Commission seems 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.

We submit that the Commission have seriously underestimated the increase in road traffic which would result from a new runway. This is because –
a. their assessment is based on forecast road traffic in 2030, when the new runway would be operating at well under its full capacity; and
b. they have only looked at the extra road traffic caused by air passengers and on-airport staff, and left out of their assessment the road traffic due to catalytic and induced employment.

To deal with the extra traffic on the A roads and local roads would require many traffic engineering schemes which would put a substantial extra cost on West Sussex, East Sussex and Surrey County Councils. In numerous cases, it would cause damage to historic town and village centres many of which have conservation area status.

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 has already been mooted, resulting in more loss of countryside, and a further adverse impact on Ifield. We submit that there appears to be no space for this new road on the southern side of the new airport boundary without demolishing more houses on the northern side of Crawley.

Rail over-crowding is another aspect. It has been calculated that 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.

Even if 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, that would not apply to journeys by the workers in the new firms attracted to the area.

We are surprised that the Commission has accepted GAL's contention that no new investments in

railway infrastructure would be required other than those already planned. Already with no new runway, the Network Rail forecast is that passengers on the Brighton main line will rise by 30% between 2010 and 2020. The Commission admits that: ‘High levels of crowding would be felt in peak hours on some services, particularly into London Bridge, although this would largely be driven by background demand growth.’

We will submit that the Commission have seriously underestimated the increase in rail traffic due to a second runway. This is because –
a. their assessment is based on forecast rail traffic in 2030, when the new runway would be operating at well under its full capacity; and
b. they only looked at the extra rail traffic caused by air passengers and airport staff, and left out of their assessment the rail traffic due to catalytic and induced employment. With Gatwick at full capacity vast infrastructure works would be required. The detailed Surface Access report prepared for the Commission indicates that when the second runway was operating 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.

We submit that it is misleading 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.

Which of the shortlisted runway options, if any, do your comment(s) relate to?

Gatwick Second Runway

Noise

GAL is incorrect in claiming that a major advantage of Gatwick compared to Heathrow is that, because the approach and take-off paths would be mainly over rural areas, comparatively few people would be affected. We are glad that the Commission recognise that ‘there are areas around Gatwick that are rural and have high levels of tranquility that would be adversely impacted by new development at the airport.’ Many rural businesses require a high level of tranquility.

Indeed 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 usual simplistic Leq figures. Leq measures noise but 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 10dB is taken into account, the difference between Gatwick and Heathrow is less marked.

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 each year in search of peace and tranquillity. Local councils have a statutory duty to conserve and enhance the natural beauty of these areas, and this applies to any decisions they may take, not merely to planning applications. Our own Parish includes the Chailey Common Nature Reserve, which is classified as an area of special scientific interest (SSI).

The Commission has published a map of the new flight paths with the proposed new runway. They emphasise that this is only illustrative and does not represent where the routes might actually be. One of the basic flaws of airport planning, in Britain and other countries, is that the actual flight paths are only decided after permission is given to expand an airport, causing many people to feel misled and aggrieved.

Nevertheless 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 approximately double.

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. Since these two flight paths would need to take all aircraft taking off to the west from the new runway, Horsham could at busy times of day experience up to one plane a minute over either the north or the east of the town.

All aircraft taking off to the east are shown as taking a route over Copthorne and Crawley Down, and close to East Grinstead which, at busy take-off times, would also suffer one plane a minute.

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.

Experience in the past year has confirmed that new flight paths – and especially concentrated flight paths
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.

We submit 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.

For these reasons, doubling the number of aircraft on existing flight paths is simply unacceptable.

Which of the shortlisted runway options, if any, do your comment(s) relate to?

Gatwick Second Runway

Air quality

We are glad that the Commission reports that at Gatwick there would be no breach of the EU legal standards (set for busy city streets). Nevertheless doubling the number of aircraft using Gatwick, plus the pollution from the extra traffic, 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 only slightly better than a busy city street.

Although the Airports Commission have concluded that one extra runway in the South East would be consistent with the Climate Change Act, this is disputed by the RSPB, Greenpeace, Friends of the Earth, WWF and other environmental organisations.

The conclusion that a new runway would be compatible with the Act is dependent on two crucial assumptions: first, that any substantial expansion at other UK airports is ruled out; and second, that scientists confirm that the non-CO2 pollution from aircraft emissions at high altitude does not have any additional damaging effect. We submit that these uncertain assumptions are a doubtful basis on which to proceed.

Which of the shortlisted runway options, if any, do your comment(s) relate to?

Gatwick Second Runway

Biodiversity

The land where the new runway would be built is attractive, with important flora and fauna. 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.’ In total, some 70 hectares of woodland would be lost.

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, for the expansion of existing firms and perhaps also for the most of the 286 displaced business premises.

Which of the shortlisted runway options, if any, do your comment(s) relate to?

Gatwick Second Runway

Carbon

Although the Airports Commission have concluded that one extra runway in the South East would be consistent with the Climate Change Act, this is disputed by the RSPB, Greenpeace, Friends of the Earth, WWF and other environmental organisations. The conclusion that a new runway would be compatible with the Act is dependent on two crucial assumptions: first, that any substantial expansion at other UK airports is ruled out; and second, that scientists confirm that the non-CO2 pollution from aircraft emissions at high altitude does not have any additional damaging effect. We will submit that these uncertain assumptions are a doubtful basis on which to proceed.

Which of the shortlisted runway options, if any, do your comment(s) relate to?

Gatwick Second Runway

Water and flood risk

The Commission statement that the risk of flooding ‘would not be known until well into a detailed design period and possibly not until the airport was operational’ is astonishing, particularly with the predicted likelihood of an increasing number of extreme weather events this century.

Which of the shortlisted runway options, if any, do your comment(s) relate to?

Gatwick Second Runway

Place

Our Parish is likely to be severely affected by the increased demand for housing, the increased pressure on local services, and the increased congestion on our roads. We would also be badly affected by increased aircraft noise which could well lead to blighting of our currently peaceful environment and severe economic effects on house owners owing to the resulting depreciation in property values. The character and quality of the Chailey Commons Nature Reserve (an SSI) would also be severely impacted.

Which of the shortlisted runway options, if any, do your comment(s) relate to?

Gatwick Second Runway

Quality of life

As noted in our other answers, quality of life for residents of Chailey Parish would be worsened by increased noise, more frequent traffic congestion, and rail over-crowding from local stations.

There would likely be a severe impact on local schools, doctors, hospitals and social services, all of which are already under strain.

Which of the shortlisted runway options, if any, do your comment(s) relate to?

Gatwick Second Runway

Community

The character of our local community would be placed under stress by substantial inward migration of the needed extra airport workers and other associated jobs from elsewhere in the UK, or from other parts of the EU.

Which of the shortlisted runway options, if any, do your comment(s) relate to?

Gatwick Second Runway

Cost and commercial viability

The likely increases in charges per passenger would certainly be unpopular with the general public. The viability of Gatwick as a commercial organization would be reduced in comparison with other airports. Higher airport charges might also make raising of finance difficult.

Which of the shortlisted runway options, if any, do your comment(s) relate to?

Gatwick Second Runway

Operational efficiency

A major 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 a 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.

We would remind the Commission that with both runways handling arrivals and departures, there could be no scheme to provide respite by alternating the use of the runways, as at Heathrow.

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. 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. We submit that this would reduce the resilience of Gatwick to cope with bad weather and would likely lead to operational delays.

Which of the shortlisted runway options, if any, do your comment(s) relate to?

Gatwick Second Runway

Operational risk

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In addition, with only one motorway and one rail line providing ground access, Gatwick would remain at risk of disruption and delays caused by congestion.

Which of the shortlisted runway options, if any, do your comment(s) relate to?

Gatwick Second Runway

Delivery

Gatwick Airport Ltd have made 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 legally binding agreement. The Commission have stated that they are giving serious attention to this issue, and we would encourage this approach.

In any event, some of the promises are worth less than they seem. For example, the offer of

£1,000 a year to those living within the 57 Leq contour would probably be worth less than the compensation to which home owners would be legally entitled under the Land Compensation Act.

Which of the shortlisted runway options, if any, do your comment(s) relate to?

Gatwick Second Runway

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

The predicted economic growth and increased employment opportunities are not true benefits if they are achieved only by the inward migration of new labour.

Which of the shortlisted runway options, if any, do your comment(s) relate to?

Gatwick Second Runway

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

The business case for Gatwick expansion would collapse if aviation were to become subject to fuel tax and VAT.

The business case for Gatwick has already been rejected by both EasyJet and British Airways.

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.'

Which of the shortlisted runway options, if any, do your comment(s) relate to?

Gatwick Second Runway

Q8 Do you have any other comments?

We are against the proposed expansion at Gatwick, and in particular the building of a new runway. We are also against the introduction of new flight paths over previously peaceful areas of rural countryside, such as prevail in our Parish of Chailey.

Which of the shortlisted runway options, if any, do your comment(s) relate to?

No Airports Selected.