

INTRODUCTION

- This response has been approved by our Wisborough Green Parish Council (WGPC).
- WGPC welcome the methodical and rational approach adopted by the Commission and are reassured that the Commission has not been influenced by Gatwick Airport Ltd's expensive advertising, publicity and lobbying campaign.
- The Commission has asked for points on which their analysis may be incorrect or they may have overlooked. WGPC has picked up a number of such points, the answers to the questions in the consultation paper are at the end of this document.

WHY WGPC IS OPPOSED TO A SECOND RUNWAY AT GATWICK

In summary:

The character of much of Surrey, Sussex and Kent would be altered forever;

- The jobs necessary to support a second runway would cause result in large scale influx of labour from other parts of the UK, the EU and beyond;
 - About 40,000 new houses would be needed, also many new commercial premises, causing urbanisation and loss of countryside. The effect of trying to introduce this number of new homes would likely extend as far as Wisborough Green where the development of a Neighborhood Plan incorporating 60 new homes has already put a strain on village character;
 - A severe strain would be put on primary and secondary schools, general practice doctors, clinics, hospital capacity and ambulance services, leisure facilities, local roads and green space;
 - Increased aircraft noise would adversely affect three times as many people as at present;
- New flight paths over previously peaceful areas would cause intense disturbance, distress and anger, this is a particular issue in Wisborough Green. Changes to aircraft movement patterns should be incremental to take into account the critical importance of predictability within the public sphere; put simply if someone chooses to move at or close to an airport or underneath a flight path the existence of the nuisance/blight will have been factored into their decision, if someone chooses to move to a truly rural village then they have done so with a

reasonable expectation that they will not suffer from aircraft movement. The concentration of new aircraft into super-highways is grounded in a misguided belief that there is benefit from scarring areas of minimum population, riding roughshod over the concept of predictability and, for instance, promulgating the notion that the creation of a National Park was a cosmetic exercise rather than a serious attempt by the State to create and maintain an area of beauty and tranquillity. Similarly, what was the point of creating the many AONBs and SSSIs that will be over flown by continual concentrated flights.

- It is calculated that 100,000+ more vehicles a day as well as more commercial traffic would use the roads around Gatwick which are already, in many cases, subject to congestion and delays, this will be severely exacerbated;

- 90,000 extra people a day using rail services, as with the roads these services are already running at, or close to capacity, meaning congestion, delay and misery for this that already rely on the rail service;

- There are inadequate plans for the widespread infra-structure required to service a development of this scale and a similar lack of realistic funding. In addition to the local issues of road, rail, housing and medical and educational services highlighted above there appear to be no plans for a new rail terminal at or adjacent to Victoria Station, a new trunk road to central London nor the increase of capacity required on the M23 and M25. If the Gatwick Second Runway development were to be green-lighted it is hard to see how these substantial costs would have to be borne by the taxpayer and the West Sussex rate payer neither of whom have spare funds.

- 14 hectares of ancient woodland would be destroyed;

Noise

- The consultation document compares 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.

- Leq contours measure the area affected by the physical volume of noise and do not measure the amount of disturbance and annoyance. When account is taken of background noise levels, it can be shown that the level of disturbance at Gatwick, compared to Heathrow, would be much more 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, when that 10dB is taken into account, the difference between Gatwick and Heathrow is less marked. We request that this factor is taken into account in the recommendations of the Commission.

- 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 tranquility. Many rural businesses require a high level of tranquility. What is more, 70% of departures from Gatwick are to the west and the concentrated flightpaths have dense overflight of the recently created South Downs National Park. The consultation document recognises 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.’ What is the point of creating a National Park currently experiencing 39 million day visits *per annum* if tranquility, one of the purposes of its establishment is an early casualty of airport expansion. 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.

- A wide range of noise impacts shown in the consultation document, depending on the type of metric used and on the future use of the airport, show that the number of people affected by noise with a new runway would be two or three times as many as at present. However, they fail to show the intensity of the

blight on those affected, especially those close to the airport or under the new flight paths whom, in many cases will experience a loss of amenity that could bring into question infringement of their human rights. We reemphasize our reference to predictability earlier in this document.

Flight Paths

- An 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. 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.
- 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 pinpoint routing leading to more aborted approaches and might prove impracticable in strong winds. This would reduce the resilience of Gatwick to bad weather delays.
- New flight paths. The Commission's document 'Operational Efficiency: Airspace' shows possible new flight paths with a new runway. Whilst claimed 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.
- All aircraft departing to the west from the new runway (*circa* 70% of Gatwick departures are to the west) are shown 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.

All new flight paths, especially concentrated flight paths as determined by NATS, as experience in the past year has confirmed, over peaceful areas cause massive anger and distress because the previous quiet is shattered, expectations of tranquility brutally destroyed, house values depreciated and people left trapped unable to move away without serious financial loss. The concept of predictability set out above having being ignored.

- The Commission needs to take full cognizance of the fact that the disturbance caused by new flight paths would be far greater than is measured by the conventional Leq or Lden metrics. It would extend for at least 20 miles from the airport, much further than the Leq contours.
- 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. Gatwick has already been utilizing predatory pricing to attract more night flights from other airports, if the warnings recently expressed by EasyJet, are to be believed the pressure for more night flights will be intense.

Urbanisation

- A major concern for WGPC, 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.
- There is a questionable assumption by the Commission 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 fanning social tensions.
- Likely economic benefit would accrue to 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.

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.
- 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.
- 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.
- 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', that would imply around 60k – 80k new catalytic jobs.

The consultation document (and GAL) maintains, without conclusive evidence, 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.

WGPC 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.'

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]'

- Induced jobs. All the above figures exclude local induced jobs (generated when employees spend their money). 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.
- 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.

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. 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 especially given the inadequate and expensive options for travelling to work.

- 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.

New houses

- Consultants commissioned in 2013 by 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. That estimate is roughly confirmed by the above calculation of around 60,000 new jobs.
- The consultation document puts the figure at 18,400 new houses. That is based on a calculation of extra jobs which is shown above to be too low. A figure of *circa* 40,000 new houses would be more accurate.
- 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.
- Building *circa* 40,000 new houses would mean a serious loss of countryside and would put additional pressure on small rural communities some distance from Gatwick already struggling to meet existing demand.
- The in-migration of labour would put a severe strain on other social infrastructure, such as hospitals, schools, doctors, social services, etc.

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 double-decking of car parks which cost has not been included and should be

added to the estimated cost of the runway plan.

Road Congestion

- 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. The M23 near Gatwick has an 'on time' score of under 60%.
- It is surely therefore an egregious omission that the consultation document only lists a few minor road improvements within a mile or so of the airport. 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.
- The consultation document seriously underestimates the increase in road traffic. This is because the assessment:
 - is based on forecast road traffic in 2030, when the new runway would be operating at well under its full capacity;
 - 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.
- Examining the situation with the airport 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 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: 64,000 per day.
- On top, it is necessary to add car journeys by airport employees, journeys by workers in the new catalytic firms in the Gatwick area and 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 the calculation above, a total of 60,000 extra workers assumed 60% travel by road twice a day, giving an additional 72,000 car passengers per day.
- Combining journeys by air passengers and workers gives a total number of road journeys (excluding buses and commercial) of 136,000 persons per day.
- Allowing for more than one person per car approximately 100,000 extra vehicles per day; in addition to the white vans and heavy goods vehicles generated by the activity of the new firms attracted to the area.
- This 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 consultation document omitted that this substantial increase in traffic would put pressure on A roads and local roads within 20+ miles radius of the airport. Gatwick lacks any good road connections to the east or west. Many local roads through neighbouring towns and villages would become congested with queues at junctions, making journeys to work or to school frustrating and time-consuming and adding to local pollution.
- Dealing with the extra traffic on the A roads and local roads would require traffic management schemes many of which would cause damage to historic town and village centres, many of with Conservation Area status. The costs would fall to West Sussex, East Sussex and Surrey County Councils. Gatwick have offered a £10m contribution, West Sussex are seeking £30 million which is probably a sizeable underestimate.

- 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

- The consultation document grossly underestimates the increase in rail traffic due to a second runway. This is because the assessment:

- is based on forecast rail traffic in 2030, when the new runway would be operating at well under its full capacity;

- only includes the extra rail traffic caused by air passengers and airport staff, and excludes the rail traffic due to catalytic and induced employment.

- With the airport at full capacity and taking the consultation document target that 43% of air passengers use rail, suggests 21.9 million extra rail passengers per year, 60,000 per day. Taking 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 *circa* 30,000 per day.

- With Gatwick at full capacity on two runways there would be on average around 90,000 extra rail journeys every day in the vicinity of the airport.

- Whilst much of the flow of passengers to and from the airport tends not to be at commuter rush-hours, a theory advanced by GAL, that would not apply to journeys by the workers in the new firms attracted to the area.

- It is a further egregious omission 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.

- It is dishonest for the consultation document to assess the benefit of a new runway operating at full capacity, while assessing the road and rail implications when the new runway is only half full.

- With a second runway Gatwick, operating at full capacity, would require extensive and expensive infrastructure works. 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.

The cost of such construction should be added to the cost of the Gatwick runway plans. These additions dwarf the cost of putting the M25 into a tunnel at Heathrow.

- That Gatwick is only served by one motorway and one railway line makes it vulnerable to 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.

Economic Benefits

- The consultation document suggests 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.

- A new runway at Gatwick would also have deleterious economic effects. It would increase the North-South divide, would create more employment in the South East adding to the pressure on 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.

- It defies logic to plan for the UK's largest airport to be located south of London. Forecasts show, in some scenarios, building a second runway at Gatwick could result in the 'migration of flights from Stansted and Luton to Gatwick'. Where is the benefit in concentrating 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. The Quality of Life assessment by the Commission is flawed as it fails to take into account that in any one year only about 50% of the UK population fly and most flights are taken by those in higher income groups. Those who do not fly, mainly infirm, 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).

- 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.

Higher Cost

- The consultation document estimates that the cost of building a new runway at Gatwick would be up to £9.3 billion. 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.

- GAL have recently 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. This difficulty will be increased by the opposition of almost all the local authorities, by the local Members of Parliament, and by EasyJet and British Airways.

- Various items have been identified where the cost of the Gatwick option has been under-estimated in the consultation document and in the Cost and Revenue Identification paper: Larger earth bunds, double-deck car parks, end-around taxiways, rapid transit system underground, widening M23 and M25, M23 extension into London, local roads, Underground station at East Croydon, moving Listed Buildings, flood protection works, optimism assessment increase due to climate change uncertainties.

Total extra cost: £10,887 billion

- 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, estimated at £7.5 billion, half the cost of Crossrail.

- 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. It would be difficult to collect this money in advance, and therefore the whole cost has been allocated to the taxpayer.
- 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 these lines.

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. 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.
- 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; a major flaw in the business case for Gatwick.
- If airlines and their passengers were to choose Stansted or another airport which did not have the cost of building a new runway, passenger numbers at Gatwick might be lower than forecast. That happened at Manchester: since the second runway 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.
- 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.
- It is thus not surprising that EasyJet, Gatwick's largest customer, has submitted a powerful response supporting a new runway at Heathrow, and opposing a new runway at Gatwick.
- The 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 risk of decline

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.'

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q1. What conclusions, if any, do you draw in respect of the three short-listed options? In answering this question please take into account the Commission's consultation documents and any other information you consider relevant. The options are described in Section 3 of the consultation document.

The reasons why a second runway at Gatwick should be rejected are set out above.

In addition we would add:

- Gatwick Airport Ltd cannot be trusted with a major infrastructure project

"On the grounds that Gatwick Airport Ltd has totally failed to be transparent about its financial evaluation, and has concealed the public expenditure implications of the infrastructure needed for a second runway, its proposal should be rejected by the Airports Commission"

Sir John Stanley, MP, House of Commons, 18th December 2014

- Gatwick provides the least economic benefit to UK PLC

Heathrow £112bn-£211bn/£101bn-£214bn versus Gatwick £42bn-£127bn.

- Gatwick's expansion is not supported by the major airline companies

This includes IAG, owners of BA, and EasyJet

- Gatwick has significantly poorer existing surface infrastructure; the access rail line is already fully utilised and insufficient allowance has been made for either upgrading the railways or the roads. This includes the very high cost - in money, time and environmental impact - of having to expand both to cope with additional numbers.

- Gatwick has not set out in public its financial evaluations; "I consider that Gatwick Airport Ltd has failed - and failed scandalously - to be open and transparent about the financial evaluation of its project"

(Sir John Stanley)

- Gatwick has a higher risk financial profile; "Gatwick...would be vulnerable to airlines switching to an expanded Heathrow, whilst a new runway at Gatwick would increase its airport charges and could alienate its price-sensitive airlines."

Xavier Lopez Del Rincon, VP, Moody's

- Gatwick's expansion is opposed by the core County Councils; including West Sussex (home to Gatwick), Surrey and Kent.

Q2. Do you have any suggestions for how the short-listed options could be improved, i.e. their benefits enhanced or negative impacts mitigated? The options and their impacts are summarised in Section 3 of the consultation document.

No night time flights, advanced Continuous Descent Arrivals from a greater height than 4,000 ft, utilising PBN technology to achieve maximum dispersal of flight approach and departure routes, Continuous Climb Operations on departure to 7,000 ft Ascent Departures, compulsory fitting (including retro-fitting of vortex generators on Airbus A319 series to minimize whine.

Q3. Do you have any comments on how the Commission has carried out its appraisal? The appraisal process is summarised in Section 2 of the consultation document.

WGPC welcome rational approach but submit that case for a new runway at Gatwick has not been made. However, the Airport Commission has not been sufficiently rigorous in its approach to examining the costs, risks and environmental impact of regional infrastructure changes that would be required if a second runway was to be built at Gatwick.

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

The greater impact of noise in rural areas and the actual and extensive damage to AONB, Heritage Sites and other tranquil areas to both the West and East of the airport.

Questions 5-7 relate to how the Commission has appraised specific topics, constructed its sustainability appraisal and constructed its business case, respectively.

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

Q6. Do you have any comments on how the Commission has carried out its appraisal of specific topics (as defined by the Commission's 16 appraisal modules), including methodology and results?

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

Question 8 asks if you have any further comments on any aspect of the Commission's work.

Q8. Do you have any other comments?

- Contrary to the Commission's assessment in para 3.45, ('local opinion'), there is very significant opposition indeed. Witness W.Sussex, Surrey and Kent County Councils have voted to oppose and the emergence of over 13 organised Campaign Groups with extremely strong backing.

b - Gatwick cannot be trusted. This statement from its CEO infuriated many thousands of people and led them to entirely lose trust in the company as flight path re-vectoring had taken place, as admitted by the CAA, "...the impression may be that something has changed, although I can assure you nothing has..." Stewart Wingate, CEO, Gatwick Airport to Charles Hendry, MP, re flight paths, 18th July 2014