



Airports Commission Consultation
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29th January 2015

Dear Sir,

Response to Airports Commission Consultation

Nutfield Conservation Society (NCS) is a voluntary group based in Nutfield Parish, Surrey, United Kingdom and has a number of environmentally based interests. The Society operates via the above c/o address and can be contacted via e mail address info@nutfieldconservationsociety.org.uk

Our Society requests that we are informed on the outcome of the consultation.

The objective of this document is to follow the consultation document in question sequence and make comment where we are able to do so. However NCS wish to place on record the following general observations before recording our responses.

NCS members are not aviation experts or professionals.

We have endeavoured to study the business case and sustainability documents. The Glossary of Terms alone amounts to 22 pages, the Gatwick proposal accounts for 138 pages and the two Heathrow proposals 140 and 144 pages respectively. We are sure you will understand the difficulty in assimilating this volume of information and making informed observations.

The same issue clearly affects the vast majority of our residents, many of whom are intimidated to the point of deciding not to respond. We therefore must question the viability of such a complicated procedure which is likely to produce results that do not fairly reflect the level of concern and opposition to the various options. Similarly the level of response is likely to be relatively low although should not be taken as an indication of any level of disinterest, support or opposition.

Our community will be significantly affected by the Gatwick Airport option. On that basis we intend to comment only on the Gatwick proposal. Any responses that indicate opposition to the Gatwick option should not be interpreted as support for either of the Heathrow options.

Q1 Concerning Gatwick we conclude that this option should not be exercised particularly in view of the numerous adverse effects that the commission has identified and recorded in the business case and sustainability document.

Q2 We have no comments

Q3 We have no comments

Q4

- a) Concerning Gatwick we are concerned that the Gatwick management has, according to Commission findings, failed to produce accurate construction cost estimates. These estimates are apparently several billion pounds under Commission projections. If the figures do not add up at this stage the Commission should address this. If the initial costs are unrealistic with the addition of the inevitable cost increases that will occur during construction, Gatwick management will be faced with a white elephant and a project they cannot financially sustain. The tax payer would then have to step in to bail out the project. Please refer to banking history and to motorway construction in the South East during the early 1970's which reflect similar circumstances.
- b) Hydrology issues have not been fully explored.
- c) Many questions regarding issues with emissions, climate change and conformity have not been fully addressed.
- d) The effects on the natural environment and wildlife have barely been considered.

Q5 The following responses all concern the Gatwick Airport option only.

Economy Impacts

- a) NCS consider that adverse economic effects may result. The area is one of low unemployment. The existing labour force is not sufficient to fulfil the potential labour requirements. This will be exacerbated by the expansion and development of new businesses associated with the airport.
- b) There appear to be two alternatives for additional workers. The first option is to travel in from other areas. This will add to already overcrowded road and public transport infrastructures.
- c) A second option will be to build new housing and appropriate community amenities in the area. This course of action will require massive expansion of Crawley and spread into rural and green belt areas. Such projects will require large investment and create other planning issues.
- d) A number of existing businesses will have to relocate or cease trading. Other existing companies may suffer due to labour shortages.

On wider geographical matters there are indications Gatwick expansion may attract existing trade from other south east airports which is to the disadvantage of those airports and is clearly counterproductive and divisive.

NCS acknowledge that job creation in principle is important. However the Centre for Cities think-tank studies have proved that the North South divide has widened. The study also indicates many northern areas are suffering high levels of unemployment which is exacerbated by the losses of available work. The Government has a *vision to build a northern powerhouse* to compete with London and the South East. Job creation resulting from airport expansion in the south east will exacerbate the North South divide and may be considered contradictory to Government vision.

Surface access

- a) The increase in passenger numbers will cause a massive increase in road and rail use. This will be exacerbated by both travelling airport workers, new/expanded local business workers and other increased industrial traffic generated by an expanded airport and local businesses.
- b) The existing motorways in the area are already over stretched. The immediate local A roads are often congested and mainly single carriageway. The other local roads are mainly rural narrow roads. The infrastructure demands improvement at existing levels. Only minor improvements in the immediate area of the airport are mentioned and reliance is placed on current plans to try and mitigate the existing motorway problems. This is all totally inadequate to deal with the increase resulting from airport expansion.

- c) The rail infrastructure will similarly have to handle massively increased passenger numbers. Forecasts for existing main lines indicate huge increases without a new runway. Some investment is indeed planned but does not take account of the increase due to a new runway. No mitigating plans are offered.
- d) The Commission estimates of road and rail use are based on forecasts for 2030 at which time the new runway will not be operating at full capacity. The Commission has only factored in additional rail passengers based on airport customers and workers. These factors result in under estimates and an inaccurate assessment regarding the national benefits of a runway against the implications for transport in the area.
- e) Significant road or rail improvement sufficient to accommodate the user increases would raise many complicated planning issues and demand massive investment. Not to mention the attendant disruption during construction.

Noise

- a) The Commission acknowledges that there will be a massive increase in the number of people that will be subject, in varying degrees, to noise annoyance. In addition to the Commission findings other data is available which indicates an increase by two or three fold is likely.
- b) Considerable data is reproduced and limited modelling has been completed by the Commission. The data produced does not include over 5,500 new homes or villages that will be affected by noise in consequence of amended flight paths as a result of a second runway.
- c) An increase in air traffic will result in additional tranquil rural areas experiencing disturbance and the over-flying of designated Areas of Outstanding Natural Beauty.
- d) Residents in the areas adjacent to the airport will be subject to increased disturbance arising from ground activity such as taxiing and maintenance.

The ultimate conclusion by the Commission is that noise will have an adverse impact.

This conclusion is further qualified that notwithstanding all mitigation measures will not neutralize these adverse issues. The Commission does not offer any solutions to potential noise impacts exceeding World Health Organisation guidelines.

The effects of noise are a particularly overt form of impact and can have severe effects on quality of life and well being. The fact that other airports may be noisier or effect more people is irrelevant to the suitability of the Gatwick option which should be judged on its own effects and not in comparison.

The imperative should be to neutralize adverse effects. A declaration that, notwithstanding that the noise effects of the Gatwick option are adverse, the option should be exercised as other airports are noisier and effect more people is perverse.

Air Quality

- a) The World Health Organisation describes air pollution as the world's biggest environmental health risk.
- b) The European Court of Justice has ruled that the UK must take action to ensure air pollution is reduced.
- c) Gatwick Airport has breached legal air quality limits over recent years.
- d) The Airports Commission's appraisal confirmed that the Gatwick option would have an adverse impact on local air quality unless significant mitigation is put in place.
- e) A comprehensive assessment of the level of adverse impacts to local air quality has not been undertaken, no action to identify the amount of people that would be adversely affected has been carried out and no mitigation has been identified.

We submit it is inappropriate to build a second runway that will add to air pollution particularly at a site that already breaches air quality limits

NCS consider that reducing the risk to health is paramount and should override all other factors.

Similar to the issue of noise referred to above, comparison with other sites is irrelevant and Gatwick's case should be judged on the effects it produces and whether or not this complies with air quality legislation.

For the Commission to proceed without comprehensive data and guarantees to ensure compliance with legal pollution levels is inappropriate and casual concerning public health.

Carbon (CO₂)

- a) The Commission acknowledges it has not carried out a cost benefit analysis of (Gatwick) expansion where emissions are limited at a level compatible with climate goals. This analysis should be conducted and included in the final report.
- b) The Commission has not reported what policies are required to ensure aviation's CO₂ emissions are required to ensure levels are restricted to compatible climate goals. The Commission should provide detail of policy required to limit emissions within the cap when increasing runway capacity.
- c) Research indicates that a runway extension at Gatwick would result in Heathrow and Gatwick airports together taking up two thirds of the total emissions available to aviation. This would result in regional airports having to be capped at below current levels to accommodate expansion.
- d) The Airports Commission has produced its own forecast of CO₂ emissions. These are lower than Department of Transport forecasts. This concerning discrepancy is not mentioned or explained. Climate change commitments are a key issue in airport expansion. The discrepancy should be addressed and the relative effects of each set of figures to the expansion issue reported.

These shortcomings result in a less than complete picture regarding the net benefits of expansion.

Natural Environment and Wildlife.

- a) The expansion of Gatwick airport will require considerable land-take. A consequence will be the loss of many acres of irreplaceable ancient woodland, ancient trees and essential wildlife corridors.
- b) Ancient woodland is particularly vulnerable to climate change therefore any that survives the land-take/expansion will be in serious jeopardy as a consequence of additional emissions arising from expansion.
- c) Development and vegetation clearance seriously affects woodland hydrology which can result in flooding or drought either of which can ultimately lead to the loss of remaining habitat after the land-take.
- d) Ancient woodland includes unique undisturbed soils and ecosystems that host rare and threatened wildlife. Many species are slow to react to change, do not easily adapt and are not mobile enough to move to other locations in order to survive.
- e) Loss of habitat, increased light and noise pollution and general disturbance will affect interaction between species, foraging and predation. These aspects will adversely affect even the more robust species.

The commission make considerable mention of the economic arguments for expansion but almost nothing is said about the cost to the natural environment.

Water and Flood Risk

The Commission report that the risk of flooding would not be known until well into a detailed design period and possibly not until the airport is operational appears to be a cavalier approach especially in this day and age where it appears climate change is increasing flood events. The area south of Horley is particularly vulnerable to flooding and failure to comprehensively address the issue in advance may lead to disastrous consequences in operational and financial terms.

NCS urge the Commission to properly address the matter in advance of embarking on Gatwick expansion.

If mitigation measures are taken over time at Gatwick to protect the airport and Horley, these may have a negative effect in areas downstream already periodically affected by flooding, ie Betchworth, Brockham, Leatherhead, Chobham, and eventually property bordering the Thames. Whatever mitigation measures are adopted at or near Gatwick, these need to be aimed at water retention within the airport boundary rather than accelerated removal downstream; and given the generally high groundwater level in this area, these retention measures would probably require considerable land-take above groundwater level. The cost and land-take implications need to be considered from the outset and include the predictions of more short term high rainfall events resulting from identified climate change.

Quality of Life

A number of the specific headings we have commented on will have a detrimental effect on the quality of life for many residents living near to the existing and proposed flight paths. Not only will more residents over a wider area be adversely affected but the level of effect will also increase.

It is interesting to note that several of the issues will have adverse effects on health and climate. These are acknowledged by the Commission as producing adverse effects. These categories include Noise, Increase in harmful emissions and the carbon impact.

It should be non-negotiable that health related issues be resolved unequivocally before sanctioning any runway increases.

Q 6 We have no comment on the methodology. NCS have commented independently on various aspects of the results. We would draw your attention to our comments in the opening passages to the volume and complexity of the documents.

Q7 Please see our response to Q6.

Q8 Health and Environmental costs should take priority over economics. Many of the Commissions assessments are based on minimal analysis and, in some cases no research, with an indication this will follow at a point after the site has been selected. No account is made of a situation where an issue proves insurmountable, or the effects are very serious. This may result in considerable unforeseen expenditure, delay and potentially resort to the public purse.

NCS urge the Commission to address all environmental issues equally at present noise and emissions are the main issues referred to in relation to environmental issues. There is little or no consideration given to the adverse effects on the natural environment, landscape or wildlife.

We also urge the Commission to fully research all issues (environmental and others) to the same extent as they have economic factors. An appropriate weighting could then be applied to all matters and a fair balance be made against the economic arguments.

NCS consider health and environmental issues have been effectively sidelined to advantage the economic case.

The Aviation Environment Federation (aef) has analysed The Airports Commission's runway options. They conclude that all the options fail one or several environmental tests that were jointly identified by aef and other organisations. They further conclude that the tests are unlikely to be satisfactorily met in the foreseeable future.

Aef conclude that no new runway capacity should be provided.

NCS endorse that proposition and are particularly concerned that the tenor of the consultation is **"this is going to happen regardless of the consequences"**. We have the distinct impression the economic aspect is the ruling factor and consider this to be dangerous and misguided.

The lack of complete research, failure to address certain issues and findings that reduce government forecasts throw serious doubts on the credibility of aspects of the Commission's report and supports NCS's concerns regarding a **"done deal for expansion"**

The only way in which a rational and meaningful decision can be made is if all the aspects are researched to the full and, where necessary, complete mitigation measures are identified and guarantees to implement them included in any decision.

The Commission identifies several aspects of the Gatwick plan that will result in adverse effects. Including Noise, Increase in harmful emissions, Carbon impacts, Flooding, Place and Community objections.

The effects of these and all the other negative aspects should be viewed cumulatively and solely in relation to effects of the Gatwick Airport option. This should be conducted without a comparison with other sites.

NCS do not consider the Gatwick option to be suitable owing to the detrimental effects it will produce for residents and the dramatic change in character for the mainly rural environment of the location.



Chairman

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