



Campaign Response Text:

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

A second runway at Gatwick is totally unacceptable.

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

If a second runway were to be built, the local infrastructure would not cope, not enough housing, schools, hospitals etc. How will any of this be paid for?

Greater recognition of noise in rural areas and those already badly affected by the recent flight changes.

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.¹⁵

If that 10dB is taken into account, the difference between Gatwick and Heathrow is less marked.¹⁶

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.¹

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 giving serious attention to this issue.

Further, I look forward to either the current flight paths being returned to their previous paths or being offered Noise Pollution compensation

Ifield, with its historic church (grade1) and attractive Conservation Area would

be badly affected by ground noise. We will tell the Commission 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.

A new earth bund is shown (dark green) 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

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

Would the Commission please properly engage with the people affected.

The way the CAA has handled the flight path and P-NAV changes is wholly inadequate and unacceptable.

Welcome rational approach by the Commission.

Deplore advertisements and lobbying by GAL.

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

Commission wrong to have ignored under-used airports north of London.

The already existing ongoing issues with plane noise from the recent changes to plane flight paths.

Virtually no consultation and a seemingly devious approach to get the changes through.

Q5. Comments on specific topics?

Strategic fit.

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.”⁵⁶

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

It would not ‘improve the experience of passengers’. Let me quote the GACC research:

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.⁵⁰

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. GAL have, however, now agreed to bring forward the construction of the new terminal and rapid transit system.

The Airports Commission estimates that the cost of building a new Gatwick runway would be up to £9.3 billion.⁵³

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.'⁵⁴

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 taken into account that the increased charges might cause some airlines or passengers to move to other airports.

It would worsen the north-south divide, and hence not maximise benefits for the UK. This is such a big issue

Economy impacts –

Economic benefits of Gatwick runway as calculated by the Commission are half those for Heathrow. Why?

Local economy impacts

Likely to be negative as many firms would suffer from shortage of labour and traffic congestion.

Adverse impact on rural businesses.

As already mentioned, in this part of the world the current infrastructure could not cope with a new runway and the levels of unemployment are already very low.

Surface access.

Greatly increased road traffic due to air passengers, noise and air pollution, airport staff, plus new firms attracted to the area. Proposals put forward by GAL, and accepted by Commission, insufficient.

Greatly increased rail use.

Your proposals are insufficient.

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 2041.²⁷

*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%.²⁸

*In Annex B we give 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. It 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 is accepting 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 will tell the Commission that they have seriously underestimated the increase in road traffic. 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.⁵⁰ 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 will tell the Commission 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

*We set out our calculation of the increased number of rail passengers in Annex B. It shows 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.

*We accept the argument advanced by GAL that much of the flow of passengers to and from the airport tends not to be at commuter rush-hours. But that would not apply to journeys by the workers in the new firms attracted to the area.

*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.'

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*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 will tell the Commission that it is disingenuous 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.

Noise

Noise in rural area more annoying because of low background noise. Affects a much wider area than at Heathrow. Therefore simple comparison of numbers at Heathrow and Gatwick invalid.

The Commission has published a map (shown below) of the new flight paths with a 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.

Doubling the number of aircraft on existing flight paths not acceptable.

Air quality

Even if the forecast is that Gatwick with two runways would not exceed EU limits, we, locals, have no wish to have air quality worsened. There are days already, because of the new flight paths, where one can smell aircraft fuel all around. This must have health repercussions. What studies or care have you taken over this?

Biodiversity

Concern at loss of 70 ha. of woodland including 14 ha. of ancient woodland.

Loss of countryside due to need for 40,000 new houses, and displaced commercial premises. Others are better placed to comment further than I.

Carbon

Aviation is the fastest growing cause of climate change. A new runway would increase climate change damage. This was further highlighted after the Iceland volcano forced many flights to stay on the ground. The air quality all around the UK was so higher.

Water and flood risk

Give local experience of floods. Would be increased by run-off from runway and buildings.

Place

Redhill is already fighting the changes to the flight paths.

We suffer seriously from noise pollution already and will fight the current changes through the courts if needed

Quality of life

Would be made worse by increased noise, traffic jams, rail over-crowding. By pressure on schools, doctors, hospitals, social services.

Community

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

Cost and Commercial viability

Increase in charges per passenger would be unpopular with public. Would lessen commercial viability in relation to other airports. Higher airport charges would make raising finance difficult.

Operational Efficiency

Reduced by the fact that existing terminals are on the 'wrong side' of the runway. This has very bad ramifications.

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 will 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 will tell the Commission that

this would reduce the resilience of Gatwick to bad weather delays.

Operational risk

Parallel arrival flight paths only 1 km apart. See above

With only one motorway and only one rail line, Gatwick would be at risk if disruption, and also delays due to congestion.

Delivery

No trust can be put in promises by GAL unless put in a legal agreement before Government makes a decision. The current process over the P-NAV has shown the CAA, Gatwick, etc, cannot be trusted to pass on the facts in a netral or trusting way. Broken promises and untruths all of the way

Q6. Comments on the sustainability assessments?

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

Q7. Comments on the business cases?

The business cases for both Heathrow and Gatwick would collapse if aviation were to be subject to fuel tax and VAT, even allowing for air passenger duty.

Business case for Gatwick rejected by easyJet and British Airways.

See notes further above

Q8. Any other comments

I say no to the new runway and no new flight paths.

[REDACTED]