

## AIRPORT COMMISSION CONSULTATION – Submission from [REDACTED]

I am an individual living in Tunbridge Wells in Kent and my knowledge mainly extends to Gatwick Airport's bid for another runway. I would like to submit the following answers to the Airport's Commission consultation for review (document also attached as Word Document):

**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.**

Overall, I think your short listed options are all a bit of a joke – no business market projection, which on review of your methodology and assessment remit I suggest your 'consultation document' basically is, could possibly be given credibility when it comes to predicting beyond ten years into the future when it comes to science and technology. For example, you are still using already discredited and out of date noise metrics. What's more we live in rapidly changing times with the UK Government both defined and restrained by complex global politics. Just one of the major considerations with respect to this circumstance is that aviation is fundamentally dependant on the fossil fuel industry; even within the first month of 2015 this industry has demonstrated that its future is in doubt not only in terms of geo-politics e.g. Saudi Arabia and middle eastern unrest generally, but also market volatility because of vulnerability to divestment/taxation/ etc in view of climate change.

I conclude that since the Airport's Commission consultation documents are fundamentally flawed (please also see answers below with more specific reference to this) no more runways should be planned at this time. In particular, a second runway at Gatwick should definitely not be built. Given that the Airports Commission is a projected assessment and that importantly- the markets are fundamentally unpredictable at the moment - Gatwick Airport Ltd has the weakest business case of the three options considered. To be specific, even if Gatwick Airport Ltd (GAL)'s feeble bid is the cheapest option initially it's essentially bad investment because of:

i/ Your own (largely optimistic) figures predicting roughly half the economic benefit to the UK as a whole vs Heathrow bids

ii/ Gatwick expansion not being supported by major airlines or most other globally operating companies

iii/ Gatwick, being roughly equally distant south of London as Oxford to the north i.e. not actually being in London. Existing transport links are extremely poor and particularly by road and in the east and west direction. Rail travel is extremely expensive in the UK. Even one off journeys are a major expense for the average British salary and Gatwick is mostly used for leisure purposes i.e. on the basis of salary and current austerity cuts less people will be able to travel by air in the future, and the Gatwick bid is more expensive for consumers in the long run.

GAL's attempt at rectifying the burden of transport strategy amounts to a fantastically new local station and a bit of tinkering with the junction of the M23/M25 i.e. major taxpayer contribution is needed for the general population to get to the airport in the bottom right hand corner of England and that's likely to be unpopular with the majority of taxpayers. Pollution on link roads e.g. via Westerham are already near NO<sub>2</sub> limits and in addition, Gatwick would not solve London's already extremely dangerous pollution problem but merely extend the public health effects of aviation expansion further across the densely populated south east. Research shows that the north/south divide would be exacerbated by a new runway in the south east and not least via carbon capping -those residents from the North would need to cross London to access an expanded Gatwick Airport that's trying to be more like a hub. There is no direct Gatwick Heathrow link.

iv/ Gatwick has redacted it's financial evaluations suggesting that it does not have a robust business case but a rather market sensitive business case instead. As a member of the public I do not of course have the liberty of commenting on actual figures – a case of failure in democratic accountability perhaps? I certainly don't feel that there is ever clarity with GAL, and suggest if Gatwick were chosen for expansion its choice would always be suspect in both the private and public arena.

v/GAL's lack of experience in handling a major infrastructure project counts against development success and in fact, GAL has acted in a highly incompetent manner so far with regard to public relations. It has demonstrated no ethical responsibility with regard to noise, air pollution or chemical pollutants released on site during aircraft ground movements. It has made hollow claims with regard to wildlife on site and in fact culls birds and has installed artificial grass in large areas.

Vi/ In terms of sustainability, British people receiving average salaries or below may not be able to continue going on the kind of foreign holidays Gatwick travel offers.

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

A recent study by the CAA showed that Heathrow and Gatwick are situated in such a way that increasing expansion of Heathrow would impede Gatwick flights and vice versa. Simply looking at flight paths on a map reveals this antagonistic placement of the two airports, one being directly south of the other – ie most flights must approach Heathrow from the south forcing both Gatwick departures and arrivals from similar directions to a lower altitude etc. There is limited airspace in the South east and PNav will not greatly alleviate the fact that Gatwick's main east west approach paths are crossed by Heathrow planes. The environmental impact on communities under Gatwick flightpaths following increased numbers of aircraft flying below 7000 feet in terms of air and noise pollution is greater, and especially because ambient noise levels tend to be lower: it's a double whammy.

The longer a plane flies higher the better to mitigate its noise and air pollution on the ground and therefore, developing Gatwick to the current size of Heathrow or larger would mean reduced ability to mitigate aviation noise effects for both airports. Heathrow would be the best choice in terms of this commission remit simply because it is already a hub airport and expansion would be more of an automatic process, in turn probably leading to decreased number of flights from Gatwick. Reduced flights to and from Gatwick would allow Heathrow more chance at flight rotation and dispersal, similar to those

techniques employed by Sydney Airport, Australia, which has had great success in mitigated the negative impacts of expansion.

Generally speaking, a change of attitude in the CAA and NATS is required to help mitigate noise and air pollution impacts in the UK - for a start, the impact on quality of life of arrivals should be considered as equal in relevance to departures and airports should not be allowed to maintain the current fairytales about noise. A modern noise measurement standard needs to replace noise averaging (as represented by current use of the 57dBLAeq), so as to better reflect actual impact of repeated noise events and where ambient noise levels are low, the increased disturbance caused by aircraft should be properly acknowledged. Noise mitigation should be overseen by a fully independent body i.e. one not run by the aviation industry. This agency should have statutory powers to force noise compliance. It should also operate across all airspace planning dispersal and mitigation impacts more holistically around Britain as a whole.

At present, Gatwick Airport unfairly targets rural areas and areas of low-density population such as AONB's by concentrating flight paths over them, even advertising this persecution of minorities as a major benefit of its expansion over Heathrow – there is no evidence this practice would change if Gatwick were allowed to expand. Flight paths, as in the well documented Sydney Airport example, should tend towards dispersal rather than concentration to minimise creation of 'noise ghettos'. What's more all airlines should be encouraged to upgrade aircraft and especially those aircraft with known flaws that create noise of particular annoyance such as the Airbus 318, 319 and 320 whine. These planes should be immediately and retrospectively fitted with a modification to reduce FOPP cavities and similar aircraft noise.

There should be a fundamental review of the number of night flights across Britain. Night noise is known to be particularly damaging to public health and there is evidence that air pollution does not disperse as well during the night.

In addition, to properly mitigate the negative effects of pollution from aircraft the aviation industry should not be reviewed in isolation but in terms of how it fits in to the overall transport picture – road access is paramount in reducing

pollution as is use of public transport. As previously pointed out, Gatwick fits into this greater transport strategy less easily than Heathrow.

However, the only realistic 'mitigating' action is not to permit a second runway to be built in the South East at all, since this would lead to concentration of flights in this area.

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

The Airports Commission has underestimated the costs and environmental impact of infrastructure changes that would be required for a second runway at Gatwick. For example, the Commission has significantly underestimated the increase in rail traffic that would result from a second runway at Gatwick because:

- i/. Its assessment is based on forecast rail traffic in 2030, when the new runway would be operating at well under its full capacity.
- ii/. It has only considered extra rail traffic caused by air passengers and on-airport staff, and left out assessment of the road traffic due to catalytic and induced employment. See Airports Commission Consultation Document November 2014 paragraph 2.26. The detailed Surface Access report prepared for the Commission indicates that when the second runway is operating at full capacity 'Further options would involve a more significant investment in infrastructure'. I agree with this analysis, but it is not rigorously pursued in the Commission's work.

Given that the London-Brighton rail line, on which Gatwick lies, is already operating at full capacity, very substantial infrastructure works such as a new rail tunnel from the Purley area into (or through) central London and incorporating an underground station at Croydon, would be required to expand it, but this cost has been omitted. It is disingenuous to claim benefit calculated on a new runway operating at full capacity, while assessing the road and rail cost implications based on the new runway being only half full.

Another infrastructure-led option identified is double-decking, but given 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. See Airports Commission: Surface Access: Gatwick Airport Second Runway. Pages 6-7 When Gatwick reaches full capacity on two runways there will be on average around 90,000 extra journeys every day in the vicinity of the airport. Verbal evidence at Airports Commission public discussion session, 16th December 2014 Gatwick contends that many travellers use surface transport outside peak times. This is largely dependent on predicting the future of airline scheduling and with Gatwick's own target market uncertain this cannot be assured. Also off-peak usage is unlikely to be the case for journeys made by the people in the new firms attracted to the area or indeed those brought in to construct the project. See Airports Commission Consultation Document November 2014 paragraphs 3.48 and 3.52 In short, despite already serious overcrowding issues on southern and south eastern trains **the Commission has accepted Gatwick's contention that no new investments in railway infrastructure would be required other than those already planned!**

It is clear from this that 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, and not least in view of the sudden and massive influx of migrant workers expected to staff the new airport.

Nor has the Commission factored in the particularly acute disturbance that aeroplanes have where ambient levels of noise are low. In an otherwise tranquil area, Gatwick's planes also have major visual impact. **The Airports Commission have seriously undervalued the amenity of nature and wildlife areas in its report: if expansion at Gatwick goes ahead one of the last three remaining AONB areas in the South East would effectively be urbanised.**

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

At a time when international Climate Change legislation means that Britain may only be able to build one more major airport runway in the next fifty

years, the Government and Commission seem to be flying in the face of the full implications of basing that runway in the south of the country at a time when policy might best seek a rebalancing of the economic divide between Britain's north and south (the have and have nots) for the benefit of the country as a whole. More efforts should be made to explore maximising use of existing airport capacity to address this inequality, perhaps by selective taxation.

In relation to this, I suggest that the Commission evaluates its own operational bias. It has no third option of no new runway. Instead, the Commission operates on the basis of aviation expansion at any cost. It cannot therefore be argued that the Commission is fully 'independent' in its assessment. The remit and entire framework of the Commission paper is clearly a product of right wing political ideology. As such, in blatant alliance with market led economic arguments, the Commission paper is firmly rooted in 2015 and highly unlikely to accurately predict or help Britain to address the future response to climate change effects and reduced resources or limits arising from issues such as food security and energy constraints.

Since publishing the Airport Commission consultation, support for Gatwick expansion has been largely withdrawn by all but one local Council therefore the Commission are incorrect in stating; 'Local opinion appears to be mixed with opposition from local community organisations and some local authorities, but support from others, subject to the provision of adequate environmental mitigation, and from regional business organisations'. Thirteen campaign groups have been formed and subsequently supported by many thousands of local residents who resent the claims made by GAL (using discredited noise data) that relatively few people are affected by Gatwick. In fact, as shown by correlation between number of movements and number of complaints in Gatwick's own flight performance data, annoyance levels from Gatwick's noise is extremely high.

The loss of local employment in businesses, predominantly in the Leisure industry, reliant on tranquillity in areas beneath Gatwick flight paths such as heritage assets and AONBs has not been adequately assessed by Gatwick or the Airport Commission. Nor has a fully comprehensive environmental impacts survey been done on how the wildlife in the South East that will be effected, particularly migrating birds.

Incidentally, research shows that public access to nature and wildlife sites enhances productivity just as no access to them reduces it – how factors such as this may affect any economic benefits of expansion have not been properly assessed by the Commission. Nor has the Commission adequately reviewed the particular ramifications of climate change on air travel – for example, many of the countries where people currently go on holiday will be badly effected by new weather systems.

**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?**

Noise in rural areas is more disturbing because of reduced ambient noise. The Commission's simplistic comparison of average numbers of people effected by noise at Heathrow and Gatwick is not a realistic modelling technique and therefore invalid.

Has the Commission fully examined the effect of the loss of 70 ha. of woodland including 14 ha. of ancient woodland if Gatwick's second runway is built?

Has the Commission fully examined the loss of countryside due to the need for 40,000 new houses near Gatwick?

With only one motorway and one rail line as surface supporting infrastructure and access, has the Commission fully examined the operational risk at Gatwick in the event of either access route or both being closed for any reason?

Has the Commission realised that there is significant flooding risk in the Gatwick area, or that there is an application for Fracking underneath the airport? (which has been associated, among other problems, with earth tremors).

The charts in 3.31; 3.32 and 3.33 do not have labels on the axes and are difficult to understand. They show numbers of those affected by noise but not the marginal impact of increased frequency of noise. Is there adequate data on this issue for informed choices?



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

The Commission has relied upon the CAA for many statistics and they must be fully and independently checked for accuracy because dialogue with the CAA by the community group Gatwick Obviously Not has shown that even the office of the Chair and CEO of that regulator are unaware of some basic facts that affect hundreds of thousands of people – such as the wind direction on any given day. The following information has been sent out many times by the CAA and cannot be regarded as a one-off error:

'This year [2014] Gatwick has seen record levels of traffic, which might have increased your awareness of noise in the area but at least 50% of operations have been on the easterly runway, which would in itself have reduced the impact in your area' -PA to Dame Deirdre Hutton, Chair & Andrew Haines, CEO, 08.09.14.

This vital statistic was incorrect at the time and is incorrect now. No month in 2014 saw 'at least 50% of operations have been on the easterly runway' and the average split for 2014 was 68/32

[http://www.gatwickairport.com/Global/b\\_0\\_business\\_and\\_community\\_images/b\\_7\\_aircraft\\_noise/FPT%20Qrt%203%20report.pdf](http://www.gatwickairport.com/Global/b_0_business_and_community_images/b_7_aircraft_noise/FPT%20Qrt%203%20report.pdf)

The CAA also failed to acknowledge the existence of the Airbus A319 series whine caused by a design flaw of these aircraft for many years although they have actually known about this problem since 2005.

In short, the CAA is ruled by its corporate sponsors – the airport owners and airlines - and clearly biased in their favour. The culture of the CAA is not conclusive and open but one of control.

**It is disappointing that the Commission should tie itself so closely to the CAA rather than to more independent, scientific research of which there is much available as well as expertise outside the aviation industry. The suggestion once again is that the Commission itself is biased in favour of the aviation industry and not fully independent, which of course ties in with to its 'expansion at any cost' remit. See my comments above re Airports Commission bias.**

This bias also extends to the disregard and devaluation of wildlife assets such as the Ashdown Forest, which has important European and UK protected status, is under the proposed flight paths and yet appears to have been ignored in the sustainability assessment. The catalytic effect of expansion at Gatwick on the communities, businesses and heritage assets in West Kent, Sussex and Surrey should be incorporated into the Commission's work on Gatwick, but is notable by its absence. Such a narrow view of which businesses and communities are directly affected by the proposal further undermines the credibility of the Commission's consultation and report.

Little attention has been given to the effect of sleep disturbance on the British population which leads to sleep deprivation and to a considerable impact on well-being, and of course in the long term productivity and health etc. The Commission's assertion in para 15.2 of the Gatwick sustainability assessment is invalid:- "Living in a night time aircraft noise contour was not associated with any effect on subjective wellbeing."

Scientific data is very clear on night noise – aircraft noise is deemed the most stressful and the human body cannot adapt to it in an unconscious state. Therefore, this statement from the Commission is clearly untrue and entirely unsubstantiated.

I hope that the above examples (of which there are more) demonstrate that the Commission's sustainability assessments, including methodology and results are examples of oversimplified economic modelling, which tends to look at aviation expansion in isolation of real world effects and assumes limitless growth is possible without the existence of natural limits.

**Q7 Do you have any comments on the Commissions business cases, including methodology and results?**

Yes – the business case for airport expansion is entirely unproven, and cannot be proven.

With specific regard to Gatwick's business case I note (as above) that it is largely redacted. This does not inspire confidence in its business case, nor is this question entirely fair in the circumstances. How am I, as a member of the public, to know if the business case for Gatwick is sound when the exact

figures have been withheld? How does the Commission justify this outrageous situation?

#### **Q8 – Do you have any other comments?**

Speaking as someone unfortunate enough to now live under the constant and unrelenting noise of Gatwick planes during the summertime when I would dearly love to spend time outside in the countryside with my family and hear birds sing, or even perhaps have my windows open at night, I would like to state that do not enjoy living in sensory poverty and do not trust Gatwick Airport as a business. It is a business with demonstrably no social responsibility whatsoever in the relentless pursuit of profit – it is a hedge fund, that pays no UK Corporation tax. The current owners of this business have stated they will immediately sell it in the event that Gatwick is chosen for expansion. This is clearly not a business interested in developing and delivering long term infrastructure and productivity improvements for UK PLC.

I fear for the wellbeing and life prospects of my children, and not least with respect to climate change – we are all being sacrificed for short term profiteering.

I also conclude that the Airport Commission assessment is not independent and is deeply flawed in its remit. It uses economic modelling systematically ignoring nature and treating it as a limitless resource with no inherent value – just something to exploit- and the outcome of this is that human life and wellbeing have little value.

All the variables within the remit of the Commission's investigation are only those considered relevant to impacts on the aviation industry as a **business**, and what's more a business apparently operating in isolation of geopolitical events and as though the fossil fuels on which planes rely entirely will last forever. Simply put, this is not a sustainable model. In its rigorously bureaucratic disregard for human life and wellbeing the Airports Commission report may in fact end up helping to destroy our planet. Has the Commission assessed whether there is a more credible and desirable future?

Regards

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