

[REDACTED]

Email Subject: Objection to 2nd runway at Gatwick

[REDACTED]

Airports Commission Consultation

Freepost RTKX-USUC-CXAS

PO Box 1492

Woking

GU22 2QR

Airports.consultation@systra.com

02 February 2015

Dear Sir/Madam,

Ref: Government Consultation on additional capacity in the South East

Thank you for providing the opportunity to comment on the Airport Commissions three lead options proposed for additional runway capacity in the SE of England in 2030.

I am writing as a local resident to Gatwick Airport. As an airport user I fully support the Commissions view that the current approach of forcing even greater volumes of traffic through the UK's existing airport infrastructure is unsustainable. However, I object to a second runway at Gatwick, and the fact that this remains an option for additional capacity in the South East. This is because the Gatwick proposal fails to satisfy a significant number of the Commissions objectives when compared to the other two short listed runway options; either by lacking evidential support or, by drawing incorrect conclusions by failing to consider important aspects of Gatwick's infrastructure, airlines and local environment. You may have seen these reasons set out in other letters similar to this but all the reasons are very relevant to me.

Additionally, some airlines tend to take a short cut into Gatwick by flying low over the village of Hartfield. The addition of a second Gatwick runway will increase the volume of this rogue flight problem significantly.

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

The Gatwick proposal fails to satisfy a significant number of the Commissions objectives and raises the following concerns:

- It does not align as well as the Heathrow options with local development and regional strategies and there is no evidence to substantiate if the surrounding 14 Local Authorities (LA's)

could cope with the 18,400 homes the additional growth would require.

- It is significantly limited in the number of Code F (A380) aircraft that can operate into it relative to the other airport options.
- It provides minimum resilience to the London Airports systems relative to the Heathrow options as it will only be able to accept only a very limited number of Code F (A380) aircraft.
- The surface access changes proposed by Gatwick are insufficient and disproportionate to their growth forecast and reduce the egress and access resilience of the airport.
- The rail proposal lacks strength and solidity causing crowding in the peak hours on the Brighton line; and hinges around the Brighton line providing passenger access to the airport on routes which are “slow” and provide poor passenger connectivity to London.
- In addition, the rail proposal requires further investment by 2040 but no future funding “source” has been identified for this.
- The resilience for the Gatwick road infrastructure is inadequate with only one motorway (M23) and a limited number of major roads (A and B roads) around the airport, many of which are already congested.
- It does not benefit the local community to the extent of the Heathrow options and the Gatwick solution only benefits a smaller number of people when compared to the two Heathrow options proposed for road and rail.

The numbers of people affected by noise impacts around Gatwick are significantly below the total number at Heathrow, however 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. Specifically the Gatwick proposal makes no commitment to preserve these tranquil areas whereas the Heathrow options recognise the need to a flexible approach to aircraft over flight.

The conclusion reached by the Commission with regards to Gatwick's resilience in the event of disruption is incorrect. The Commission's view is that the proposed expansion of Gatwick would not worsen Gatwick's resilience to disruptive events.

This is incorrect as -

- should Gatwick lose a runway, diverted air traffic would cause congestion in the London Airports system as it would not be able to divert to Heathrow as that is near maximum capacity.
- the lack of proportionate development in the surface access around the Gatwick area will mean any road or rail problem will prevent passengers from arriving to or dispersing from the airport.
- Gatwick appears to have under estimated its financing and delivery risks when compared to the Heathrow options;
- Failing to identify key dependencies in its critical path
- Having unrealistic phasing of delivery and financing relative to the other runway options

In addition the Gatwick proposal –

- has a misleading tone, creating a perception that the proposal is one of “do minimum” to promote the future sale of Gatwick Airport, whilst the other two runway options demonstrate genuine intent to deliver benefits to the local community.
- has completely failed to identify the fact that it will need to “attract” airlines to grow, and therefore has not considered the actions it will need to take to attract the airlines, as the provision of the new runway and surface infrastructure alone will be insufficient.
- does not improve connectivity to growth markets or maintain London’s status as a global city, something the Heathrow proposals offer.
- is significantly less beneficial to air freight when compared to the Heathrow options which are highly beneficial to the air freight sector facilitating growth in cargo.
- has non-viable housing plans compared to the Heathrow options which are more realistic.

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 short-listed options could be improved by providing an indication of any:

- Government Compensation schemes that may be associated with the negative impacts including an indication of how schemes will be funded by the Government

- cost per additional Air Traffic Movement (ATM) of economic benefit, which would facilitate a true comparison of options.

It should be acknowledged that wherever the expansion occurs there will be negative impacts.

To conclude the final recommendation must be a holistic one, and one which will bring maximum benefit to the UK and maintain London's status as a global city.

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

The Commission's approach to this appraisal is misleading. The Commission's primary focus has been on the erroneous creation of a competitive London airport system, based on the belief that:

- Gatwick is nearly full to capacity
- Airlines will choose between runway locations (ie. Airports)
- Gatwick will enable a strong domestic route network and increase international connectivity if more capacity is available.

These assumptions are incorrect, expansion will not enable international connectivity, expansion will only enable more runway slots, and the airlines appetite for slots will determine where international connectivity and growth of a strong domestic route network will occur. The Commission has over estimated that Gatwick is near capacity by failing to understand that whilst

Gatwick's existing runway is operating at approx 85% capacity, there remains head room for further growth, but airlines, for commercial reasons do not wish to utilise these slots.

In addition, the Commission fails to acknowledge in the business case that Gatwick consistently fails to retain long haul airlines e.g. Garuda Airlines, Korean and more recently Vietnam Airlines.

In the evolving unstable economic market the UK's priority has to be global growth, and this should not be limited by the belief of some politician's to "force" UK airports to compete when no other country in Europe or Asia or State in North America attempts to do this.

The UK should not play the righteous nation by attempting to portray a political attitude of virtue and piety but we should protect and grow our status in the international market place and make the UK the international market competitor it deserves to be.

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

The relevant factors that have not been fully addressed by the Commission to date include:

- deliverability of schemes
- risk scoring of the deliverability of the schemes
- airlines appetite to use the proposed additional capacity for all options

- evidence to demonstrate the “magnitude” of resilience in the London airports system that is created by each of the expansion options
- further evidence to explain which proposal fits best as a competitive hub in the international market
- further analysis to show how the current plans for the Brighton rail line will meet Gatwick's growth requirements
- further analysis to show how the current plan for the M23 will ease congestion as opposed to exacerbating it
- an expansion of the quality of life analysis to take account of the tranquil areas around Gatwick
- an explanation of why the quality of life analysis is only to 5km from the airport, and
- an explanation of how this relates to how people are affected by noise beyond 5km? Is this now a descriptor beyond which the Government considers that people are not affected by noise?
- A depiction of cost per additional ATM of economic benefit for each option

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



I have comments on two areas:

- The Commission scenario's for forecasting future demand for aviation broadly followed the approach taken in the first phase of work, however there is no evidence to indicate if the forecast demand in air traffic has accounted for airline demand for incorporation of the Airbus A380 into airline fleets.
- The Commissions appraisal of surface access around Gatwick appears flawed and requires improved evidence to substantiate the results that the Brighton rail line and M23 satisfy the Commission's objectives for the short-listed options

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

The Commission has tried to take an unbiased approach to the Sustainability Assessments by trying to imply that a scheme is not suitable for progression due to poor performance in one area or a number of areas.

However whilst this approach to the consultation has been undertaken with the intent of being unbiased, it does not feel that this principle has been applied impartially as there is a “tone” of favouring Gatwick in this section, a tone which is embedded within the whole of the consultation.

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

The Airports Commission's Strategic Case comprises (1) a summary of how the scheme satisfies the Commission's assessment of need in terms of the (potential) capacity, connectivity and benefits of competition provided, and its impacts on passenger experience and the freight sector: and (2) a description of the wider economic, social and environmental impacts with reference to existing spatial and economic strategies.

The Commission emphasises the fact that the Gatwick existing runway is currently operating at over 85% capacity with limited room for further growth in ATM. However, as I have already commented in Q3 the Commission is over estimating that Gatwick is near capacity and neglects to mention that it fails to retain long haul airlines.

The business case also advises that the current Gatwick owner is working with NATS to increase the utilization and resilience of its runway (albeit without consulting with its local community adequately), however the Commission has not acknowledged the current owners lack of loyalty to the UK economy by seeking to bring in a European Air Traffic Control Service provide (DFS) in place of NATS.

Q8. Do you have any other comments?

The Commission states that it does not believe that there will be any worsening of current levels of whole-system airport resilience, provided the on-going Future Airspace Strategy (FAS) and London Airspace Management Programme (LAMP) are successfully delivered – this in itself is risky, and specifically as Gatwick has “pulled out” of the FAS and LAMP delivery phase 1 due to its inability to consult properly with its local community. It is worth noting that FAS and LAMP benefits are dependent on NATS successful delivery of the Transition Altitude change and I would be keen to understand how the Government will hold NATS to account to deliver this on time?

Yours sincerely