

Gatwick Area Conservation Campaign

GACC

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**Revised Draft Airports National Policy Statement:
new runway capacity and infrastructure at airports in
the South East of England
A response from GACC.**

1. We are instructed in the consultation document not to repeat what we said in our response to the previous draft NPS, and we will obey that instruction. But for the sake of making our response comprehensive and intelligible to our members and to the public, we attach our previous response as an annex to these comments.
2. In our previous response we explained that we are the main environmental organisation covering the whole area around Gatwick. We, like all other airport campaigners, have always tried not to be Nimby, not to campaign for expansion at other airports in order to reduce the pain inflicted on our area.
3. As an environmental body we can find no enthusiasm for the proposed third runway at Heathrow but, as a body set up to defend the environment around Gatwick we are fiercely opposed to any new runway at Gatwick. We are therefore appalled that four councils around Heathrow¹ together with the Mayor of London (who we call the NIMBYs) are challenging the draft NPS on the grounds that a new runway at Gatwick would be cheaper and less environmentally damaging.

NIMBYs discombobulated²

4. The NIMBYs may think that there is less opposition at Gatwick but they are wrong. Antagonism is quiescent at present because the public around Gatwick believe there is no threat; but if the threat became real we can assure them that the opposition would be strong, sustained and, as in the past, successful.
5. The NIMBYs need to remember that unlike the situation at Heathrow, not a single council around Gatwick supports a new runway.
6. Unlike the situation at Heathrow, not a single Member of Parliament around Gatwick supports a new runway.
7. Unlike the situation at Heathrow, the main airlines at Gatwick actually oppose a new runway.
8. A decision to switch to Gatwick would mean going back to square one. Perhaps setting up a new Airports Commission, but at least doing all the calculations again in order to write an entirely new NPS.
9. When the new draft NPS on Gatwick was published, it in turn might well be challenged through judicial review! And thus the indecision which has marked airport planning over the past 50 years would be continued indefinitely.

Why the Government rejected Gatwick

10. The revised draft NPS sets out in paragraphs 3.16 to 3.53 the reasons why the Government rejected Gatwick. There is no need for us to repeat them.
11. Most of the case rests on economic and aviation arguments. We have set out in our previous response (below) why we believe there is also a strong environmental case for rejecting a new Gatwick runway.

The Further Review and Sensitivities Report

12. Much attention has been drawn in the press, and by the NIMBYs, to certain tables in the Further Review and Sensitivities Report.³ We suspect that these tables would loom large in any attempt at judicial review. Table ES2 on page 9 and Table A17 on page 72 should be viewed with significant caution.
13. We would comment as follows:
 - The monetary cost put on the environment at Gatwick (Table 4.1) is inaccurate as it does not make any allowance for the greater cost of noise in a rural area where ambient noise levels are low. There are more people affected than shown by the 54 leq contour, and the level of annoyance is greater.
 - The assessment does not sufficiently factor in the environmental benefit of the proposed ban on night flights at Heathrow. No such ban has been offered by Gatwick. Indeed the recent DfT night flight regime would permit in winter a 60% increase in the number of night flights and a 60% increase in noise at night.
 - While there is some obvious (but slightly chauvinistic) logic in excluding benefits that may accrue to foreigners, that would be to ignore that foreigners benefitting from a new Heathrow runway will be either transit passengers (which is the point of a hub airport) or visiting the UK on business or as tourists (which should be a good thing).
 - The Updated Appraisal Report⁴ shows that the economic benefit at Heathrow arises sooner, in 2030 and 2040, while that at Gatwick does not rise to an equivalent level until 2050. As the old adage says: a bird in the hand is worth two in the bush. By 2050 the world may have changed out of all recognition.
 - Net Present Value is only one way of measuring the benefit of a new runway. Net Social Value (which excludes the cost of construction which would initially fall on the airport owners) shows that a Gatwick runway would score worse than Heathrow. Net Public Value (which excludes the impacts on the airport and on airlines) also shows Gatwick being the less good option.
14. In making these comments we need to emphasise again that we have no enthusiasm for the third runway at Heathrow: we are merely making the anti-NIMBY case that they do not prove that a new runway at Gatwick would be more beneficial.

No new runway

15. Indeed the statistics go a good way towards proving the case for no new runway. Since these figures are cumulative over 60 years they would seem to indicate that the average value of a new runway at either Heathrow or Gatwick would be less than 5p per person per week.

16. In the Updated Appraisal Report, Table 3.4 shows that by 2050 compared to a no new runway situation a new runway at Heathrow would only increase the number of passengers at London Airports by 26 million a year, or at Gatwick by 22 million. That is less than half the capacity of a new runway.

17. That surprising result is because it is forecast (Table 3.7) that with no new runway, the number of passengers at London airports would increase by 26% to 204 million. But at airports in the rest of the UK the number of passengers would double. The effect of a new runway would be to suck these passengers back from regional airports to the South East.

18. Again, as an environmental organisation we have to be careful not to welcome exporting the noise and pollution although we can't resist commenting that it would avoid any physical destruction and help to restore regional balance. Indeed no new runway produces a result that by 2050 airports in the rest of the UK are forecast to have the same number of passengers as those in the South East - compared to the present situation where the South East has two-thirds of the air traffic but only one third of the population.

19. The Airports Commission rejected any measures to promote regional airports on the grounds that people from London would be forced to drive further. Nevertheless people who live somewhere in the middle might well prefer to travel to Manchester (which already has two runways and is running at under half its full capacity) rather than flog round the M25 to get to Gatwick.

END

OUR RESPONSE TO THE PREVIOUS CONSULTATION

Gatwick Area Conservation Campaign

GACC

18 May 2017

RESPONSE TO The Consultation on the Draft Airports National Policy Statement 2017

Introduction

1. GACC is the main environmental organisation concerned with Gatwick, and the only voluntary group that covers the whole area around the airport. We have led the campaign against a second runway at Gatwick.

2. Founded in 1968, we have as members many hundreds of individuals, over 50 District and Parish Councils, and over 40 community groups. These groups vary from three county branches of the CPRE, each with over 2,000 members, through over a dozen local aviation protest groups which have sprung up in the past four years in opposition to new flight paths, to many village amenity societies for whom aviation is only one of their concerns. All our members pay us an annual subscription, demonstrating positive support. We also have several hundred supporters on our email list.

1. Our membership covers an area about 20 miles radius around Gatwick, from Guildford to Crowborough, from Tonbridge to Petworth. Over the years we have established a reputation for accuracy and responsibility which has earned us the support of all local Members of Parliament.
2. This response has been discussed and approved by our committee which consists of 15 people coming from a wide area around Gatwick. One member of our committee, however, does not agree with paragraph 5 and Annex A: he supports the Government in believing that on economic and business grounds there is a strong case for a third runway at Heathrow.

Question 1: The Government believes there is the need for additional airport capacity in the South East of England by 2030. Please tell us your views.

3. For the reasons given in Annex A, we are not convinced that there is an urgent need for any new runway. In this we are agreeing with all the main national environmental organisations.

Question 2: Please give us your views on how best to address the issue of airport capacity in the South East of England by 2030. This could be through the Heathrow Northwest

Runway scheme (the Government's preferred scheme), the Gatwick Second Runway scheme, the Heathrow Extended Northern Runway scheme, or any other scheme.

4. We are totally opposed to a second runway at Gatwick: it would be an environmental disaster.
5. The town of Crawley with 110,000 residents would suffer severe noise and pollution. The proposed new airport boundary would be only 100 yards from residential areas. The character of parts of Surrey, Sussex and Kent would be altered for ever as a result of urbanisation, noise, pollution and traffic congestion.
6. The Airports Commission found that a new Gatwick runway would increase noise two-fold or three-fold.
7. A second runway would double the number of aircraft in the sky. New routes over previously peaceful areas or doubling the number of aircraft on existing routes would cause great disturbance, distress and anger.
8. Comparisons between the number of people affected by noise from a new runway at Heathrow or at Gatwick are invalid because they fail to take ambient noise into account. In quiet rural areas, or in the AONBs which surround Gatwick, aircraft noise causes serious disturbance over a much wider area than in urban areas with a consequent increase in the number of people affected.
9. It has been estimated that a second runway at Gatwick at full capacity would create around 60,000 new jobs.⁵ Since there is low unemployment in the Gatwick area, these would all need to come from abroad or from other parts of the UK, worsening the north / south divide.
10. About 40,000 new houses would be needed, also many new commercial premises, causing urbanisation and loss of countryside.⁶
11. Making Gatwick bigger than Heathrow would mean that many passengers would need to travel from north of London, making congestion on the M25 even worse. Expanding Gatwick would inhibit the growth of regional airports.
12. The Airports Commission found that a second Gatwick runway would mean that over 50,000 people would suffer worse air quality; that more schools and hospitals would suffer pollution than would be the case with a new North-West runway at Heathrow; and that more households than at Heathrow would be placed at risk of health-damaging air quality.⁷
13. An Air Quality Management Area (where there is a risk that pollution may exceed legal limits) has already been designated in Crawley within 1 mile of the proposed new airport boundary.
14. It has been estimated that a second runway at full capacity would mean around 100,000 more vehicles a day in the Gatwick area, causing serious road congestion and delays.⁸

15. Gatwick's aim to achieve a tenfold increase in freight would mean more commercial vehicles, increasing pollution and congestion.⁹
16. A second runway would mean around 90,000 extra people a day using rail services in the Gatwick area.¹⁰ Most of the improvements planned at present for the Brighton-London line are necessary to deal with natural growth, so the result would be standing room only on many services.
17. The cost of the necessary infrastructure was underestimated by the Airports Commission because they only looked at a situation in which the new Gatwick runway would be operating at half capacity and did not take into account the impact of catalytic employment.
18. With Gatwick served by only one rail line and only one motorway (the M23) any serious incident could bring the airport to a standstill.
19. Seventeen listed buildings would be demolished – more than at any time since the WW II blitz.¹¹ Five of these buildings are listed grade 2* - of special importance. HS2 would only mean demolishing six listed buildings of which only one would be grade 2*. Fourteen hectares of ancient woodland would be destroyed.¹²
20. Twice the number of flights would mean twice the climate change damage; or worse if there are more long-haul flights. As at Heathrow, it would be difficult to reconcile a new runway with the agreement signed by 175 nations in Paris in 2015 to limit global warming to 2^o, and to aim for 1.5^o.

Questions 3 – 6

21. It is not for us to comment on Heathrow issues.

Question 7: The Appraisal of Sustainability sets out the Government's assessment of the Heathrow Northwest Runway scheme, and considers alternatives. Please tell us your views.

22. We have studied the Further Review and Sensitivities report.¹³ Table ES2 on page 9 indicates that the Net Present Value (that is the economic benefit minus the environmental cost) of the Heathrow North West runway would be £0.2 billion - £6.1 billion while the NPV of a new Gatwick runway would be around £3.1 billion to £4.5 billion. Since these figures are cumulative over 60 years they would seem to indicate that the average value of either runway option would be less than the cost of a small cup of coffee per UK family per year. That supports our scepticism about the need for any new runway as expressed in Annex A.

Question 8: Do you have any additional comments on the draft Airports National Policy Statement or other supporting documents?

23. The decision on where to locate a new runway is a national issue. This consultation is not an X-Factor or a Strictly Come Dancing competition to be decided on the number of votes cast for each entrant.
24. We are shocked that four London Boroughs, Hillingdon, Richmond, Wandsworth and Windsor are encouraging their residents to respond to this consultation by expressing a preference for Gatwick. That is a NIMBY (Not In My Backyard) attitude of moving the nuisance to ones neighbour, an attitude which is generally condemned.
25. A second Gatwick runway is opposed by

- ! easyJet and British Airways
- ! West Sussex County Council
- ! Kent County Council
- ! Crawley Borough Council
- ! Horsham District Council
- ! Mid Sussex District Council
- ! Mole Valley District Council
- ! Tandridge District Council
- ! Tunbridge Wells Borough Council
- ! Wealden District Council
- ! 50 Town and Parish Councils
- ! CPRE
- ! The Woodland Trust
- ! Friends of the Earth and Greenpeace
- ! RSPB and WWF UK
- ! Campaign for Better Transport
- ! The Aviation Environment Federation
- ! All ten local Members of Parliament.

Annex A. WHY THERE IS NO URGENT NEED FOR A NEW RUWAY

- Aviation benefits from a substantial subsidy in the lack of any tax on aviation fuel and no VAT. Air passenger duty only makes up a quarter of the revenue lost. A gradual reduction of this subsidy over coming years would keep the demand for air travel at roughly its current level.
- The Airports Commission underestimated the impact of larger aircraft. If over the next 15 years, the average number of passengers per aircraft increases by 20% that would be equivalent to one new runway in the London area. And that is exactly what has happened in the past 15 years.

- The economic case for any new runway depends on the success of the Brexit negotiations in securing a continuation of the European Open Skies agreement.
- It is incorrect for the Department for Transport to state that existing airports in the South East will be full by 2040. That assumes that Stansted continues to be restricted to 35 million passengers per annum under a planning condition imposed by Uttlesford District Council.
- It is a nonsense that the South East has two-thirds of air passengers but only one-third of UK population. If the Northern Power House is to be given substance it would make sense to impose an extra tax on congested airports in the South East: with Brexit that will become possible.
- Uncontrolled expansion of aviation world-wide must eventually run up against the limits of natural resources.
- While the Climate Change Committee found that one new runway would be compatible with the Climate Change Act, that will only be so if expansion at regional airports is constrained. And it will cease to be true if scientists find that the impact of aircraft emissions at high altitudes is greater than emissions at ground level.

1

▫ Hillingdon, Richmond, Wandsworth and Windsor

2

▫ <http://www.dictionary.com/browse/discombobulate>

3

▫ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/562160/further-review-and-sensitivities-report-airport-capacity-in-the-south-east.pdf

4

▫ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/653879/updated-appraisal-report-airport-capacity-in-the-south-east.pdf

5

▫ 20,000 on-airport; 3,000 indirect; 25,000 catalytic (expansion of existing local firms and new firms attracted to the area by an airport larger than Heathrow); 15,000 induced (jobs created when employees spend their pay locally). See GACC Response on www.gacc.org.uk/the-runway-issue

6

▫ Study by consultants commissioned by West Sussex County Council. Lower figures were estimated by the Airports Commission but that was because they excluded catalytic employment. https://www.westsussex.gov.uk/media/1066/implications_of_changes_to_airport_capacity_slides_2013.pdf

7

▫ Airports Commission air quality assessment. 8 May 2015.

8

▫ GACC Response to Airports Commission Consultation. February 2015. www.gacc.org.uk/the-runway-issue. This figure is larger than that used by the Commission because it relates to Gatwick at full capacity not at 2030, and because it includes traffic generated by catalytic employment.

9

▫ GAL. Connecting Britain to the Future. July 2014. Page 18.

10

▫ GACC Response to Airports Commission Consultation. February 2015.

11

▫ Society for the Protection of Ancient Buildings.

12

▫ See Heritage and Countryside. www.gacc.org.uk/research-studies

13

▫ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/562160/further-review-and-sensitivities-report-airport-capacity-in-the-south-east.pdf