

CAGNE
Communities Against Gatwick
Noise and Emissions
West Sussex and Surrey

Current Government NPS consultation –
Deadline 19th December 2017

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Introduction

CAGNE, formed in 2014 out of the ADNID PRNAV trial, has since grown to be a major campaign group that opposed Gatwick expansion and seeks a fair and equitable distribution of arrivals and departures in West Sussex and Surrey, from the coast to the airport.

CAGNE concerns itself with all airspace issues created by Gatwick and has been delighted to help communities, MPs, parish and town councils with various aspects of airspace changes since 2014 producing sound, fact based arguments and documents that communities can understand and thus assist them in participating in complex aviation consultations.

Councillor members of CAGNE formed the new CAGNE Aviation Council Forum in 2016 whereby parish and town councils can become members and discuss airspace changes, Gatwick, ask questions about flight routing and have their own dedicated website for them and their parishioners to use. This assists councils and the chair of CAGNE to feed into aviation meetings on airspace changes, the NMB and other national aviation bodies, ensuring that community balanced voices are truly represented alongside industry.

The CAGNE Response

This paper sets out that the environmental damage Gatwick Airport is causing in Sussex, Surrey and Kent currently which has increased since the Airports Commissions findings unanimously in favour of Heathrow expansion due to the growth in low cost leisure travel out of the UK.

The facts clearly show that it would be wrong to expand Gatwick and spend taxpayer's money on a leisure airport the wrong side of London. Expansion that would have serious ramifications on regional growth both in the southeast and the north resulting in increasing the air quality issues for the surrounding areas due to GAL being serviced by only one road and one railway line that are already choked by traffic. Gatwick's business and economic case is based on two runways flying simultaneously with no respite for those over flown 24/7 unlike Heathrow that is offering a night ban, as do other airports. As well as due to the lack of housing and infrastructure air quality is declining and to expanding Gatwick would increase this; not just around Gatwick where areas are already causing concern but far and wide due to alternatives to the poor road system that exists in rural areas and towns.

The Airport Commission findings were unanimous in favour of Heathrow expansion after years of analysing and cost to the taxpayers. To continue the debate blights communities further and prevent strategic planning for local authorities that are struggling to deal with the current growth of population surrounding Gatwick with lack of housing, schools and hospitals.

- Communities surrounding Gatwick of Kent, Sussex and Surrey are gravely concerned by the Government's paper stating 'the Government's view remains that impacts of the Gatwick Second Runway on a priority habitats site cannot be ruled out,' as this continues the blight of residents endeavouring dealing with negative mortgages due to Gatwick's threats of expansion.
- CAGNE does not support Gatwick or Heathrow expansion, as the flight paths would impact those that suffer the most from aircraft noise at Gatwick and Heathrow currently which could only escalate by either expanding. Gatwick and/ or Heathrow would both breach the climate change targets and reduce growth in other industries and regional growth.
- CAGNE re-iterate that more local residents wrote to oppose Gatwick's proposals than Heathrow residents wrote to oppose expansion local to them. Even key figures in aviation industry are sceptical of your Gatwick's plans: Gatwick's biggest customer, Easyjet, oppose expansion so do British Airways and Virgin Atlantic.
- Gatwick still only has one access road and one access railway that are already choked with Gatwick's low cost leisure travellers; travelling out of the UK for all year round sun bringing the least into the UK economy. The infrastructure already endures the natural population growth in the southeast with no rail connections from east to west or Heathrow.
- Gatwick financially contributes nothing to the 7.7% increase in passenger numbers that it enjoys arriving via the southeast choked surface access leaving the bill for maintenance to the taxpayer.
- The Aviation Policy Framework advocate:
"future growth in aviation should ensure that benefits are shared between the aviation industry and local communities ... This means that the industry should reduce and mitigate noise as airport capacity grows" (APF page 55)

And yet communities surrounding Gatwick have not witnessed any benefits from the growth of Gatwick the reduction of aircraft noise, in fact this has escalated to form many new protest groups.

- Gatwick's next 5 year investment plan of £1.15bn is focused purely on facilities that benefit Gatwick and its passengers, not the surrounding communities or infrastructure. It focuses on more passenger and staff multistory car parks with robots operating them, a hanger, piers, Kentucky drive thru, a gin distiller, escalator to service passengers and staff, and more retail units inside the terminal.
- For environmental and economical reasons it would be wrong to expand Gatwick as it would have long term ramifications on the southeast with its lack of affordable housing, overcrowding, lack of schools and hospitals. It would destroy areas of outstanding natural

beauty, more heritage than HS2 and removal of ancient woodlands, whilst causing urbanisation of Kent, Surrey and Sussex with mass inward migration of workers to the southeast due to lack of unemployment in areas surrounding Gatwick. Jobs need to be taken to where there is unemployment; houses are boarded up and where industry is needed in the north.

- This paper also questions Gatwick's business plan that seeks to increase flights by double with no respite day or night as both runways are detailed as operating simultaneously.
- Gatwick is fundamentally the wrong side of London for passenger growth and freight, and would have serious ramifications on other southern airport as well as the northern powerhouse if it were permitted to build a second runway.
- The cost of any infrastructure for a second runway was not fully incorporated in the Airports Commissions work dissimilar costing's for Boris Island or Heathrow, or that of Gatwick's submissions as they stated 'onward surface access is not their problem.' The cost to the public purse would have to include upgrades of the M23, M25, A272, A24, A29, A264, A281, previous attempts to expand Gatwick have included tunnels at Croydon, and service roads surrounding Gatwick; the Windmill Junction of the Brighton Main Line at over £2bn, the introduction of the Brighton Main Line 2 and upgrade of the Gatwick station cost £200m. All of this may not be enough to cope with the current growth in the southeast as well as Southampton Airport growth and Gatwick Airport 2.
- Historically Gatwick has always suffered from a recession (2008 not recovering until 2011/12 unlike Heathrow), as they are reliant upon surplus funds in the consumer purse for foreign leisure travel; offering back-packers destinations, all year round summer package holidays; Disney vacations which are priced lower than UK hotels can compete with and thus having a dire impact on the UK's coastal trade.
- Airlines have moved to Heathrow when spare capacity has become available and this is not seen to change with a new runway at Heathrow. Gatwick could become a white elephant unless it takes flights from regional airports by offering low cost landing fees so adding to the migration of workers and passengers onto the roads.

Environmental Damage – Gatwick would have the same impact on climate change targets as Heathrow expansion except it would breach climate change targets for the sake of low cost leisure travel which does not benefit the UK purse. To have Gatwick and Heathrow expanded would have serious ramifications on regional growth in aviation as well as other industries due to climate change targets.

Aviation is a top ten global polluter and emissions are set to balloon by 300 per cent if action isn't taken sooner rather than later. Illogically aviation and shipping were excluded from the Paris agreement. In the UK, aviation CO2 emissions are expected to use up more than two-thirds of the UK's carbon budget by 2050. At the same time, the 'Clean Growth Strategy has admitted that we are already on course to breach these legally binding targets by 2028 without airport expansion.

International aviation emissions are expected to grow from 0.5GtCO2 in 2017 to 1.1GtCO2 in 2030 with increasing traffic demand over the coming decades despite emissions reductions from operator improvements, technology and use of sustainable alternative fuels says UNEP.

To allow Gatwick to expand with Heathrow expansion would simply breach climate change targets and force other airports/ industries to reduce carbon footprint to allow Gatwick to fly residents out of the UK on leisure breaks that do not benefit the UK purse.

Eurocontrol suggest air traffic be moved closer to the runway to reduce CO2 and yet no consideration is given to those that suffer multiple routing with no respite below 4,000ft at Gatwick. No mention has been made to the impact of continuous movements on rural areas around Gatwick. Once again aviation illustrating it is a lone cannon in desires with no consideration of impact on residents of the UK and the health consequences they cause at low altitudes.

Gatwick demand fair competition by allowing a new runway at Heathrow and Gatwick, CAGNE would question the impact this would have on all other UK based industries to benefit an airport that is owned by off shore owners.

Other industries and regional airports would have to reduce carbon footprint to allow Gatwick to fly 24/7 from two runways as Gatwick's business plan dictates. It would also have far reaching environmental impact over areas of outstanding natural beauty, heritage and rural communities where tranquility is paramount.

Gatwick 2 would remove more heritage buildings than HS2 and destroy ancient woodlands; diverting the river mole again which has led to flooding of residential areas previously; removing natural habitat for wildlife and natural floodplains, as the proposed new runway would be built on a floodplain.

Flight Paths – In brief:

- It is Government policy to minimise the number of people significantly affected by aircraft noise, Gatwick's second runway proposals ignore this requirement and ignores the fact it is surrounded by rural areas and thus targets those that chose to live away from urban areas with no compensation for the demise in tranquillity.
- Gatwick has chosen not to include options that might reduce impact, even if it were to be by only by a small amount. Its proposals focus on Heathrow in an effort to make the impact of a second runway at Gatwick look insignificant by comparison. Yet Gatwick has proposed no mitigation measures to meet current Government policy.
- Gatwick has chosen not to implement measures to reduce noise impact - mixed mode, no ban on night flights, no steeper approach, no displaced thresholds (although these may be used occasionally to increase Air Traffic Movements). Gatwick consistently refers to Performance Based Navigation (PBN) - satnav for aircraft - that brings concentration as though this is a major improvement. But, as communities are already experiencing, concentration on departures and arrivals causes great distress and anger, and this policy has lead to the formation of almost 20 active protest groups.
- Gatwick would essentially become Heathrow, but in a relatively tranquil area. To many communities Gatwick is already the 'neighbour from Hell' with insincere gimmicks rather than a strategy to reduce the impact on communities now. Even Gatwick's own commissioned 'independent' consultants criticised the airport for its lack of a noise mitigation strategy and

for its poor community relations, and for its sadly lacking communication with those affected. (Gatwick Submission to Airports Commission).

▪ **Mitigation and respite – APF Page 60**

3.28 *“The Government expects airports to make **particular efforts to mitigate noise** where changes are planned which will adversely impact the noise environment. This would be particularly relevant in the case of proposals for new airport capacity, changes to operational procedures or where an increase in movements is expected which will have a noticeable impact on local communities. **In these cases, it would be appropriate to consider new and innovative approaches such as noise envelopes or provision of respite for communities already affected.**”*

3.32 *“**However, in certain circumstances, such as where there is intensive use of certain routes, and following engagement with local communities, it may be appropriate to explore options for respite which share noise between communities on an equitable basis, provided this does not lead to significant numbers of people newly affected by noise.**”*

When considering Gatwick’s airspace plans, a key aspect of expansion is the impact and changes these will have on airspace design and the opportunity this creates to explore the use of satellite technology to provide respite routes. Providing respite through the use of multiple routes could be deemed critical when airspace is ‘modernised’ in the 2020s, which will then see the introduction of highly concentrated routes.

However, Gatwick is currently only proposing one airspace design option, and this does not consider providing respite. Other than stating it will avoid flying over densely populated areas, Gatwick makes no proposals to alternate flight paths, which would aid in mitigation of the impacts on local communities living under flight paths, including those that will be newly or more intensively overflown.

Gatwick’s proposals do not include any such measures and yet they seek to go from 270,000 to 560,000 ATMs a year.

Those overflown will always be overflown:

- Many new rural villages will be overflown by approaches to the new runway. The impact of arrivals could have been mitigated to an extent – but Gatwick has chosen not to. Gatwick already impacts communities in a 30-mile radius but ignores these as they are outside the Government minimum requirements for noise contours of 55Lden (Technically, this is defined at the 55Lden contour, i.e. the area where noise averages out at 55 decibels or more over a 24 hour period. It is the measurement used by the European Union).
- The issue of ground noise for Crawley will increase and impact more communities closer to the runway. Thus, even though they are not necessarily overflown, they will experience an increase in noise as movements more than double from 270,000 to 560,000 a year.
- Go-arounds (when a landing is aborted for one reason or another) in such congested airspace, it would be reasonable to anticipate the number of go-arounds will increase as Gatwick seeks to maximise ATM (Air Traffic Movements) on both runway for maximum profit.

Many new areas to be overflown in the West will have no respite from Gatwick Airport Expansion -

New Departure Routes:

- There will be new flights over Ewhurst and Cranleigh, Rowly and Shamley Green as well as other areas towards Godalming.
- Route 4 is likely to have a similar number of flights as today if ATM [Air Traffic Movements] is equally split between route 4 and route 3 (a brand new housing development is under construction under this route). It is feasible that Capel, South Holmwood, Leigh, Sidlow and some areas of Reigate will experience an increase in concentration.
- Warnham, Rusper, Broadbridge Heath and Slinfold will witness a new departure route over areas not previously flown over with maximum concentration.
- Horsham will be much closer to aircraft noise and will be overflown whereas it is not today.
- The trial route of ADNID (Feb-Aug 2014) will be a new route off the new runway impacting Rusper with the traffic from two runways. Rusper will receive no respite from two runways nor will Forge Wood, Lingfield, Dormansland
- Ground noise will escalate with residents being impacted 24/7 by two runways operating continuously.
- Wizad (formally TIGER) route over Horsham. Today it is only used in emergencies and poor weather conditions. This route would fly over new areas of Ifield, Faygate, Handcross, Balcombe, Ardingly, Staplefield, Balcombe, Horsted Keynes, impacting Areas Outstanding Natural Beauty and coming close to Lindfield.

- **Compensation**

As a result of expansion at Gatwick, around 27,000 households will get no break from aircraft overflight. Around 25,000 of those households would not be eligible for Gatwick's £1,000 council tax contribution scheme. Of these new areas overflown, 90% of households will not be eligible for Gatwick's council tax scheme. In addition, people who aren't overflown today will face significant disruption, with no form of compensation as Gatwick currently impacts communities in a 30 mile radius.

Sleep deprivation - Gatwick's figures for a second runway are based on a business model of operating 24 hours a day simultaneously off two runways allowing for little if any respite for the same impacted communities.

- **Night Noise – APF Page 62**

*3.35 "In recognising these higher costs upon local communities, we expect the aviation industry to **make extra efforts to reduce and mitigate noise from night flights through use of best-in-class aircraft, best practice operating procedures, seeking ways to provide respite wherever possible and minimising the demand for night flights where alternatives are available.**"*

- Gatwick will have scheduled flights during every hour of the night, yet its proposals talk little of its plans to mitigate the impact of night flights on communities. Although Gatwick has said that it will explore the options of offering respite at night, there is no guarantee of this, even though the number of people exposed to night noise doubles.

Gatwick's number one customer, EasyJet, in its presentation at the Department for Transport Night Flight Workshop stressed how a ban on night flights would impact connectivity and routing available due to lack of arrivals during the night period. Please note Heathrow does not cater for budget flights and only 50% of its flights go to Europe.

By providing no guarantee on how Gatwick plans to migrate the noise impacts of flights throughout the night, Gatwick is not meeting Government expectations for airports operating night flights to make extra efforts to mitigate noise including seeking ways to provide respite. Gatwick is also not reducing the number of flights it is operating at night, again not meeting Government expectations to make efforts to reduce night noise.

This is the case now and proposed with a second runway by Gatwick whereas other airports offer a night ban.

The impact of night flights - Pre-puberty, children are recommended to get as much as 11 hours' sleep a night, however, and up to 18 hours a day for newborn babies. Teenagers should sleep for up to 10 hours a night.

Short sleepers are generally defined as those who regularly get less than six hours' sleep and long sleepers generally more than nine or 10 hours' a night.

It is well known that chronic sleep deprivation - that is, under-sleeping by an hour or two a night over a period of time - has been linked time and again by scientists to poor health outcomes: you don't have to go for days without sleep to suffer these negative effects.*

Studies have shown that depriving people of enough sleep for only a few nights in a row can be enough to put healthy adults into a pre-diabetic state. These moderate levels of sleep deprivation damaged their bodies' ability to control blood glucose levels.

<http://www.bbc.co.uk/news/health-41666563>

Decline in Air Quality - Air quality annually costs £16m in increases in emissions. Gatwick continues to breach air quality targets and has far reaching impacts, as it has no alternative modes of transport to one access road and minor town roads.

Sussex has Air Alert and now has signs 'cut engine cut pollution' signs and decline in air quality is now linked to lung cancer.

http://www.huffingtonpost.co.uk/entry/air-pollution-has-now-been-linked-to-more-cancers-around-the-body_uk_59f9a38ce4b0d1cf6e91840f

Low skilled workers tend to live close to an airport, with 1 in 5 at Heathrow living close proximity to the airport whereas management live further afield and add to the pollution of the roads. Crawley, the neighbouring towns to Gatwick, Horsham, Brighton, Horley show no housing currently available to rent. <http://www.helptobuyese.org.uk/>

Forge Wood will have up to 1900 homes built around a central community space. This will include a primary school, community centre, office and industrial space, retail space and parkland. It is one area identified by Crawley council that is concerned in relation to air quality. This is a brand new housing estate would be at the end of a 2nd runway, approx. 1mile.

Crawley all ready has just under 4 times the recommended limit for what are termed "pm2.5" particulates. These are tiny sooty emissions from (mostly) diesel vehicles and are smaller than a quarter of the width of a human hair. In addition to this diesel vehicles emit nitrogen dioxide (NO₂) which is a thick brown extremely poisonous gas that can and does change to a strong nitric acid when mixed with other pollutants.

The Borough Council monitor our air quality and they use a different limit for the deadly pm2.5 particles which they estimate (but do not measure) from checking particles 4 times greater. Their limit is 4 times greater than that suggested by the World Health Organisation and Crawley just scrapes in below their maximum. However they accept that death rate is 5.5% (one death in 20) which is what should really concern us.

The tiny pm2.5 particles can easily work their way through a handkerchief you might put over your face when exposed to this pollution. The particles then become lodged in lung tissue and are carcinogenic in a similar fashion to tobacco smoke. In simpler terms they can kill. From the same database 5.5% of deaths are attributed to air pollution.

<http://www.telegraph.co.uk/news/0/high-air-pollution-city-does-compare-themost-polluted-cities/>

Gatwick staff are an example of migrating workers, the CEO lives in Oxted only route to and from Gatwick is via the M25 and M23 and other staff are based in the rural villages and towns such as Worthing and Brighton with many living near Heathrow adding to the rail and road congestion.

All Councils have a legal duty to monitor air quality in the town. Crawley Borough Council monitoring has shown that the average nitrogen dioxide concentration at a number of points along Crawley Avenue and around the Hazelwick roundabout exceeds the annual average Air Quality Objective for nitrogen dioxide. Following consultation that was undertaken in 2015 an Air Quality Management Area (AQMA) has now been formally declared in the affected area.

The Lancet medical journal research, October 2017, found the promotion of diesel cars to be a key driver behind pollution problems detailing Eastbourne as one of the places to breach World Health Organisation rules.

Although we accept that you 'can't blame Gatwick for everything' they do however play a significant role in congestion minor and the singular main access road as well as a bottleneck on the southeast railway line preventing the line to increase capacity further towards the coast and thus reduces the possibility of removing cars from the roads.

Rural area living – amenities are only accessible via the roads, even emptying bins requires a trip to the dump by road as local authorities cut budgets which include repairing overloaded roads.

Bus services do not work at the weekend, a peak period for Gatwick movements, and buses are often old diesel due to lack of usage and investment.

Diesel cars and buses are prevalent in rural areas, rural areas that surround Gatwick. Gatwick has no east to west railway line to take traffic from the roads and bus routes to Eastbourne have been stopped by Gatwick due to lack of usage by travellers and workers.

Cycling to work has its limitations and we question the move by the CAA to be based at Gatwick will help the congestion on the roads and rail as the staff are based much further afield.

Cowfold and Storrington have no train stations but have 40-50n/m³ air quality levels. Bus services are rather infrequent so journey and connections need to be planned.

This all results in residents having to use cars on a daily basis.

http://www.crawley.gov.uk/pw/Environment_and_Health/Environmental_Health/Pollution/index.htm

<https://www.horsham.gov.uk/environmentalhealth/environmental-health/air-quality/cowfold-air-quality>

<https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/2017%20air%20quality%20status%20report%20%28PDF%204.7%20MB%29.pdf>

Gatwick Airport has always suffered a lack of workers in close proximity and so adds to the congestion of the railway and roads by bringing staff in from other counties so increasing the pressure on the surrounding areas to accommodate migrating workers.

Lack of workers – A second runway at Gatwick would require an estimated 63,000 new workers; 2016/17 data details that the southeast as a whole having only 24.8% residents who actually want to find a job.* [*https://www.nomisweb.co.uk/reports/lmp/la/1946157343/report.aspx#tabempunemp](https://www.nomisweb.co.uk/reports/lmp/la/1946157343/report.aspx#tabempunemp)

- Crawley Borough Council details 3.4%*, that is 2,300 people are unemployed according to their figures of 2016-17 and yet Gatwick host a job event in the hope of attracting staff.
- In Horsham according to research 2016/17 figures, there are only 2,000 unemployed with only 3.7% unemployed in the southeast. And of the 2,000 figure 80.5% do not want a job and in the southeast as a whole only 24.8% actually want to find a job.*
- Brighton and Hove report that 8,000 people are unemployed and of that 59.1% do not want a job.
- In May 2017, 2,580 or 1.5% of Southampton's working age resident population were claiming Jobseeker's Allowance.
<https://www.southampton.gov.uk/council-democracy/council-data/statistics/>

At the end of March 2017 the UK saw a decrease in migrant workers to the UK of 81,000. The latest immigration estimate of 588,000 is the lowest recorded estimate since YE June 2014. The emigration estimate of 342,000 is the highest recorded estimate since YE September 2012. The highest recorded estimate for emigration (427,000) was in YE December 2008.

Gatwick increases the problems for workers as they have peak times when they require an increase in staff, eg the summer months, and so operate short-term work contracts that then hamper other industries in the area to find skilled full time staff. It often leaves contractual staff without work during the winter months.

Gatwick has also introduced computerised baggage handling and check in and so the number of jobs to be created at this airport are less than in the past. The fact that pilots are not always resourced from the UK eg Norwegian airlines, EasyJet, and that employment figures for aviation tend to use the total number employed whether the staff are based in the UK or at Gatwick, would put a shadow over the number of jobs created by an airport such as Gatwick.

Lack of accommodation for inward migrating workers due to Gatwick 2

Whereas the north sees houses boarded up due to lack of residents areas around Gatwick have a serious lack of accommodation in the close proximity to Gatwick is also an issue; In Crawley there is very little accommodation to rent, and what there is exorbitant mainly because companies at Gatwick rent it out for their staff. It would seem that there is definitely a larger demand than supply in the local area to Gatwick placing extra pressure on the surrounding areas and villages to accommodate migrating workers.

And for low skilled workers and youngsters the areas surrounding Gatwick are some of the priciest with Horsham having some of the highest house prices in West Sussex.

The local authorities are already struggling to fulfil local residents requirements for housing let alone a huge influx of inward migrating workers caused by Gatwick expansion.

The West Sussex study concluded that a new runway would create a need for 30,000 – 45,000 new houses - equivalent to a new town the size of Crawley.

<https://www.horsham.gov.uk/latest-news/news/november-2017/horsham-district-council-presses-government-to-reassess-plans-for-hundreds-of-extra-homes-in-district#sthash.EZZleJAv.dpuf>

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/internationalmigration/bulletins/migrationstatisticsquarterlyreport/august2017#net-migration-to-the-uk-falls-to-246000>

Lack of Healthcare and Schools – WSCC healthcare report details ‘the financial challenges facing the NHS (particularly given the £440m funding shortfall identified by the NHS in Sussex) impacting on ensuring people receive the right care in the right place at the right time, and on developing improved community health services’ <http://www2.westsussex.gov.uk/ds/ctee/hasc/hasc151112i6.pdf>

There is a serious lack of funding for schools in West Sussex and so inward migration of workers due to Gatwick2 would increase this pressure. At present the Department for Education showed an averaged-sized secondary school in WS would still receive around £2m less than a similar school in Greenwich under the new formula of 2017/18 and in some cases figures would be as high as £4m when WS schools were compared to schools in Hackney.

<http://www.wscountytimes.co.uk/news/headteachers-off-to-downing-street-1-8244119>

Lack of Rail - Gatwick acts as a bottleneck preventing the line to expand capacity towards the coast. A second runway is expected to add 90,000 extra passengers a day. The Airports Commission did not include the added burden to the single railway line of Southampton Airport growth, which uses the same line.

Gatwick still has no east to west rail connection and so passengers and workers use the road.

It is wrong that the planned taxpayers expenditure to improve the Brighton Main Line for natural growth in the southeast is to be permitted to be swallowed up by Gatwick leading to increases on roads in coastal regions and declines in air quality.

The other issue with the line is Southampton Airport growing as it is serviced by the same line as Gatwick. With no rail capacity or alternatives, this will only lead to additional traffic on the over stretched network of roads.

Unlike Heathrow that has direct underground services, main line and the new Heathrow Southern Railway linking Surrey rail lines direct to Heathrow, such as Guildford, Farnborough and Woking as well as HS2 to the north.

Even Southend Airport has direct rail connections to Stratford in 45 minutes and Liverpool Street in less than 52 minutes.

Whereas Gatwick –

- Has a lack of an Underground connection, the means by which the Capital's workforce gets to and from the workplace easily, cheaply and effectively. With its 250 miles of track, 280 stations, carrying 1.3 billion passengers a year (rising to 1.5 billion with Crossrail fully operational) the Tube is the transport of choice for most London commuters. However, it goes nowhere near the West Sussex airport, terminating almost twenty miles away.

Although there is speculation about a possible North/South Crossrail 2, which is of course destined to terminate in your constituency, Gatwick is still about 15 miles distant from Epsom. Tunnelling is the most time consuming and expensive of all construction works, most especially through the underlying gravel beds of the area to the south of London. Presumably the taxpayer would be asked to fund the phenomenal cost of what might perhaps be called Crossrail 3, a further extension from Epsom to Gatwick, to get the operational workforce and some passengers to an expanded Gatwick. The construction workforce would not be able to use this, of course, since it might take 15+ years to plan and build, as Crossrail 1 illustrates.

- Network Rail has explicitly said that new capacity is not for expansion at Gatwick but to deal with existing overcrowding and future background population growth in the South of England. If Gatwick expands, the benefits from these taxpayer-funded improvements (worth £4bn) will be consumed by the airport, robbing commuters of the relief from over-crowding the Government promised them. If Gatwick expansion is reliant on the delivery of these rail upgrades, how much is the airport contributing to their cost?
- Even after completion of the Thameslink improvement, the South East Route* states there will be unacceptable standing from as far out as Haywards Heath and by 2024 serious capacity problems overall (SRS pp39-40). By 2018, with or without a new runway, the SRS states (p52) that Gatwick passengers will be subject to significant congestion and standing on trains. Page references from South East Route: Sussex Area Route Study September 2015.

The Thameslink project now delayed until December 2019 <https://www.theguardian.com/uk-news/2017/nov/23/thameslink-rail-completion-delayed-london-december-2019>

- The £200m upgrade of Gatwick Airport train station benefits Gatwick passengers and yet Gatwick paid only £30m towards this.

- Gatwick 2017 has set about lobbying the government for funding for over £2bn rail improvement. The Windmill Junction on the Brighton Main Line at East Croydon will cause years of delays for commuters and is only planned for natural growth of passengers in the southeast not for Gatwick growth as detailed in the Network Rail CP7:

Aside from Gatwick Airport station itself and the immediate railway operational area, no other specific enabling works have been identified in this Route Study as specifically required to meet airport passenger growth as opposed to the large set of works required anyway to meet wider BML growth.

<http://www.bml2.co.uk/images/PDF's/BML2%20Group%20Response%20to%20Gibb%20Report%20FINAL.pdf>

- Transport for London have not costed in any funds for Gatwick expansion, it would require a new station at Victoria and London Bridge, not to mention changes to the tube and crossrail, which is only built currently to accommodate the current growth not GAL 2.
- BML2 September 2017 report details; “Cramming yet more services onto the already congested BML only attracts more passengers to aggravate the situation. Avoidance wherever possible of the major stress locations between two points – Sussex Coast towns and the capital – is both necessary and desirable.”

Even with BML2 it is not clear that passengers would use the line from Brighton, as the route would be much slower than BML. The other factor is that towns such as Tunbridge Wells is a commuter town witnessing huge increase in housing and so placing additional pressure on the current railway.

‘In order to fund electrifying the current single-line system with its maximum half-hourly service Gibb proposes the raising of Uckfield line fares (by over 60%)

‘I think it would be reasonable to increase fares with an improved service, to bring them more into line with those charged on the Hastings - London line. An annual season ticket from Crowborough to London should rise in small steps from the current £2,844 towards £4,680, as long as the electrification is a success and delivers increased passenger capacity Southern rail services carrying more than twice as many passengers as they were designed for were the most overcrowded in the country last year, government statistics reveal.’

<http://www.bml2.co.uk/images/PDF's/BML2%20Group%20Response%20to%20Gibb%20Report%20FINAL.pdf>

July 2017 reports detailed:

‘Southern rail services are carrying more than twice as many passengers as they were designed for were the most overcrowded in the country last year, government statistics reveal.

Five of the top 10 most jam-packed trains from spring 2016 and two from autumn were operated by Southern, with Department for Transport monitors recording 242 passengers squeezed on to two cars on the 5.40am service from Uckfield to London Bridge.’

<https://www.theguardian.com/business/2017/jul/27/southern-rail-tops-list-most-overcrowded-trains>

Even when Gatwick staff has direct train routes available eg Balcombe, they use the road as rail is expensive and Gatwick offer staff free parking encouraging them to use the roads.

Lack of Road - Regional ramifications for our surface access- If Gatwick was permitted to expand it would have far reaching ramifications for the labour market, regional prosperity and the surface access.

The M25 will be operating close to capacity and the A23 and A272 will be at full capacity – unprecedented congestion and pollution in our area.

It is estimated that Gatwick would add 100,000 extra cars per day on the roads in the vicinity of Gatwick plus 1000% increase in freight to the single access road of the M23 that will be at full capacity by 2040 without Gatwick expansion.

Due to the lack of surface access over half the passengers travelling out of Gatwick use the congested road system benefiting Gatwick car parking charges. Gatwick makes no effort to deter this by not charging private cars or taxis for drop off and collection unlike other airports that seek to control air quality and vehicle movements such as Heathrow. It has very few electric points and continues to have issues with private car valeting services.

It is suggested that 'enhancements' to the road network would include 'improvements to the A23'. That euphemistic phrase conceals the fact that this road would be obliterated by the new runway and, on the 2003 plans, would need to be put in a 16 mile long tunnel.

The M23 goes to a single carriageway at Croydon requiring an underpass to London; East Grinstead and Crawley both need a bypass. None of these are budgeted for.

It is widely considered that it would become necessary to build a new western bypass around Crawley, resulting in more loss of countryside, and a further adverse impact on Ifield. There would be no space for this new road on the southern side of the new airport boundary.

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 and a general environmental deterioration.

Gatwick would have an impact on regional growth - Flying from a local airport, working close to your job reduces carbon emissions and so enables local prosperity and reduces the impact on climate change.

Southampton, Bournemouth airports, to name just two, could be badly impacted by Gatwick growth as airlines are enticed by low landing fees, resulting in a decline of regional airports. This in turn forcing workers onto the roads to find jobs at other airports, so how does this help emissions, road congestion and climate change? If Heathrow builds a new runway and so does Gatwick what will happen to the northern powerhouse if climate change targets have to be reduced?

- Southampton passenger numbers are expected to grow from 1.84 million in 2005 to 3.05 million per year by 2015, to 6 million per year in 2030. Over 1,200 people work at the airport and brings economic contribution of over £86m a year to the area. It is expect that the airport

will continue to grow with around 4,000 people employment by 2030 with a contributing around £260m to the local economy.

Southampton Airport – has 19 tour operators, over 42,000 ATMS and 1.96m passengers 2016. Destinations the same as Gatwick operations to Europe but Southampton give their communities a night ban from 6.30am to 11.30pm with one runway.

It also saw services to Belfast, Edinburgh, Glasgow, Leeds, Manchester and Newcastle and saw 445,566 passengers during July and August this year; a 4.2% increase in passenger numbers and additional airlines and destinations added.

<https://www.southamptonairport.com/about-us/facts-figures/>

- London Southend Airport is a key regional and European transport hub, helping to generate important economic investment and jobs in Southend and the wider Thames Gateway. It currently serves 1m passengers annually with capacity to service up to 10m. They also have strict night movement ban on passenger planes.
- Manchester Airport details 3m, July 2017 saw an increase in aircraft movements by 6%, with more than 20,000 take offs and landings at the UK's global gateway in the North.

Cargo also increased last month with 12,059 tonnes carried, an increase of 21%, which sees the annual tonnage rise to 120,513.

- East Midlands Airport grew by 3.1% to serve 588,000 passengers in July and Bournemouth Airport grew 1.2% to 81,000.

Freight and Cargo - Gatwick claim to have a 20% increase in freight but surely the carbon footprint should be reduced for every passenger as well as every freight movement. For freight to reach Gatwick it would have to pass Stansted and Heathrow. It is totally inconceivable for freight to arrive by rail and so the road will, and does, take the burden.

Freight aircraft, non-flying from Gatwick, moves 17% of cargo. Stansted, north of London, has ample spare capacity for additional movements and areas are set aside to increase aircraft parking and freight handling facilities if required.

Manchester and East Midlands compete with the rest of Europe by transferring 97,215 and 267,350 tonnes of freight direct to Europe.

Growth in the north could serve to reduce the trucking movements from the regions to London airports as take place today with environmental benefits. HS2 freight movement and passenger movements from the north to London will also aid this benefit.

Gatwick is the wrong side of London and thus freight from the north would have to pass Heathrow and Stansted to travel.

Any reduction in cargo ATMS at London airports does not necessarily translate to lost shipment value but in northern areas this would be complimentary.

London is now served by the London Gateway and thus are not totally reliant upon air movement of freight and cargo and should be taking into the equation and combined.

Freight movement does not transfer on at Gatwick as it is purely an inward or outward bound and thus does not aid the UK as a whole. Heathrow and Stansted onward transfer of freight to other destinations.

To ensure northern powerhouse, industry needs to be supplied by local infrastructure and with shipping ports, rail, roads east to west, south to north, and airports that deal in freight and passengers to the north of the country, it would question the serious possibility of Gatwick growing in freight movements.

All but two of the core cities outside London are below the national average in output per head. We have areas that have never recovered from deindustrialisation, are trapped with poor infrastructure, low investment and skills. And we have rural and coastal peripheries that are some of the poorest places in the country. The results are reflected in our sour politics. <https://www.theguardian.com/science/political-science/2017/nov/01/the-uk-has-the-most-regionally-unbalanced-economy-in-europe-time-for-change>

Freight would have to arrive and depart Gatwick by road adding to the congestion and decline in air quality.

Larger planes, Gatwick has seen an increase of 13.6% long haul, and thus 16% cargo, this is totally reliant upon low cost leisure travel, which is most impacted, as historically shown at Gatwick, by recession, and Brexit could be a major impact.

The Airports Commission details workers seeking to fly home to visit family; CAGNE would question this as migration of workers slows because of the UK exist from Europe. Air travel is only favoured as it is often cheaper than coach travel now due to the unsustainable pricing of low cost airlines.

The inbound pattern does not necessarily mirror the outbound pattern and so the UK may be taking in more imports via Gatwick than exports of UK produce.

The Growth Forecasts – the new runway would in fact provide fewer connections to the rest of the world outside of leisure destinations as history has shown. It would be dramatically impacted by Brexit and the economic consequences as well as terrorism.

Gatwick's business case is based on flying two runways simultaneously with no respite for communities. This is flawed business plan as Gatwick suffers constant issues now due to aircraft noise and so residents will not tolerate two runways over them. This has to question Gatwick's business plan and the fact that little compensation is included. Gatwick currently faces unprecedented increases in noise complaints and so compensation bill would have to be substantial and far-reaching across rural areas of Sussex, Surrey and Kent due to the issues with aircraft noise now.

Gatwick has welcomed Emirates but as reports would suggest Emirates are also feeling the decline for the first time in long haul travel. Middle East carriers post a collective \$400m profit this year down from \$1.1bn in 2016.

<http://www.bbc.co.uk/news/business-41915555>

Emirates removal of business and first class travel would suggest that they are servicing the export of leisure travel out of Gatwick with little benefit to the UK purse.*

*<http://www.telegraph.co.uk/travel/news/emirates-drops-first-class-for-london-dubai-routes/>

The Gatwick Brexit effect – Talk of tax on European flights, airlines moving to Europe; Gatwick is still reliant upon European business, over 89%. The debate at the House of Commons in October 2017 detailed that BA and EasyJet had already organised bases in other European countries to ensure they could continue to inter fly across Europe. EasyJet supporting Heathrow expansion with bases at Southampton, Luton, Southend, Bristol, Liverpool, Glasgow, Belfast, Newcastle, Edinburgh, Manchester to destinations outside of the UK.

Thomson now TUI have linked with Denmark airline to ensure they continue to fly post Brexit.

It was also stated that a no deal might have a greater impact on European based airlines, like Ryanair that is based in Europe.

On average 89% of Gatwick's flights are to European destinations, growth is questionable outside of Europe as it is dependent upon leisure travel, those that are badly impacted by recessions and the value of the pound dropping against the Euro.

Gatwick boasts of Norwegian Airlines growth but Moody* for 2017 has downgraded them, so where is Gatwick's growth coming from as Gatwick is reliant upon Norwegian for growth outside of Europe. Norwegian is currently subbing out flight from Gatwick to JFK to Hi Fly a European leasing airline that are causing noise issues for communities.

<http://www.hifly.aero/en/profile.html>

Norwegian are estimated with a loss of -34.8 NOK per share for 2017 end of year results (-163m USD) 18.% of shares held are people betting against the company. Lost 27.4% of market value in last 12 months

<http://nordic.businessinsider.com/norwegian-just-got-a-devastating-setback--ruining-its-asian-expansion-2017-11/>

EasyJet announce a dip in profits even though passenger numbers have increased.

<http://www.telegraph.co.uk/business/2017/11/21/easyjet-profits-sink-despite-record-passenger-numbers/>

European airlines are more reliant upon the UK to continue to fly as areas such as Ibiza, Spain, Italy, Portugal, is more likely to suffer by Brexit if the UK leisure travellers stops seeking all year round sun holidays.

On leaving the trading bloc, the UK will no longer be included in the EU-US Open Skies agreement, which liberalised aviation between the two continents in 2007. That means the UK will need a new deal for flying rights to, from and within the EU, but also with the US.

Terrorism should be factored in as it was part of the reason for Monach airline declined as well as Air Berlin was due to the destinations it flew to that were affected by terrorist activity.

Turmoil in Spain, armed police on the beaches, migrants washing and sleeping on holiday beaches, unrest in the EU, leaves an uncertain future for aviation and so CAGNE would question the growth forecasts of low cost budget airlines and the Government substantial investment of taxpayers money into a leisure airport.

Low cost airlines are reliant upon low cost fuel and this has been increasing in price and is often subject to world affairs and terrorism.

The Civil Aviation Authority say 58% More Brits fly out of the UK than foreigners fly in.ⁱ So that's £ out of the UK not into the UK purse!

North South Divide - Unemployment figures reveal the job seeker claimant count moved up by 5,000 September 2017, with about 2.6m people out of work, a report by IPPR reveals joblessness has risen by 97,000 in the North of England.

Every region in the UK, other than the North, South West and the West Midlands, experienced an increase in the people in work over the past three months, the analysis said.

IPPR detail that long-term unemployment continues to rise, with the number of people out of work for 12 months or more at a 16 year high, of 886,000.

'Katie Schmuecker, IPPR North associate director, said: "The northern economy desperately needs greater local powers devolved from central government to unlock Northern potential and prevent it falling further behind.'

"The double dip recession has hit the north particularly hard. Against the backdrop of the Scottish independence debates, the continued lack of growth and investment is taking on a new political significance."

<http://www.telegraph.co.uk/finance/jobs/9406647/North-South-divide-on-jobs-as-UK-braced-for-unemployment-figures.html>

For example Manchester Airport has seen 27.6m passengers and increase of 11% year on year with direct routes to Seattle, San Francisco added this year. It also transports 123.600 tonnes of cargo annually, up by 9% this year. Manchester itself has been seen the fastest growth outside of London, with over 2,000 foreign firm based there bringing £59.6bn to the economy.

The Flyer Should Pay – Airport Passenger Duty should be increased, aviation should pay duty on fuel and VAT and so compete on a level playing field with other industries. Currently the UK treasury receives £3bn from APD and yet airlines, who are heavily subsidised by UK taxpayers as they pay no duty or VAT, are lobbying government to have APD removed impacting other services such as health by decline in revenue.

<http://www.travelweekly.co.uk/articles/292231/demands-for-apd-cut-likely-to-fall-on-deaf-ears>

The changes made Budget November 2017 do not increase the cost to leisure travel and so in kind feeds growth of the leisure market that exports UK sterling out of the UK. If the UK seeks growth, CAGNE would question why business travel ADP has increased? This must be seen as a disincentive for business to travel or export UK goods overseas.

An introduction of green taxes on aviation should be considered to reduce the carbon impact aviation continues to avoid being excluded from the Paris agreement of 2017 which does not include aviation or shipping, two major contributors to climate change issues.

Why should the taxpayer pay for unsustainable aviation growth that is fuelling growth? Make the traveller pay and aviation industry pay VAT and duty on fuel.

Airlines operate on unrealistic profit margins; Monarch and Air Berlin are an example of this.
<http://www.telegraph.co.uk/business/2017/10/28/airbus-profit-fears-airlines-drive-hard-bargain-sales-older/>

http://www.telegraph.co.uk/business/2017/10/28/travel-companies-furious-ongoing-funding-tourist-safety-net/?WT.mc_id=tmg_share_em

ICCAN – CAGNE raises concerns about the community representation already placed on ANEG and the CAA consultative groups as it does not feel it provides a true representation of views at individual airports or nationally of communities views on aviation.

CAGNE welcomes the review of powers given to ICCAN but request details of who is to sit on such a body and question who will represent communities and who will be the paymaster? CAGNE would still wish to see an independent ombudsman.

The Secretary of State call is still set unrealistically high for most communities to object to a change in airspace and so is seen as a way to prevent communities from substantiate their human rights to tranquillity and wellbeing.

ⁱ CAA passenger survey

http://www.caa.co.uk/uploadedFiles/CAA/Content/Standard_Content/Data_and_analysis/Datasets/Passenger_survey/CAA%20Passenger%20survey%20report%202015.pdf

<http://www.networkrail.co.uk/browse%20documents/strategicbusinessplan/cp5/supporting%20documents/our%20activity%20and%20expenditure%20plans/route%20plans/sussex%20route%20plan.pdf>

<http://mag-umbraco-media-live.s3.amazonaws.com/1010/masterplan.pdf00>

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