

CAGNE Communities Against Gatwick Noise and Emissions

In response to the Heathrow southeast expansion consultation into airport expansion in relation to the National Policy Framework

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/589082/consultation-on-draft-airports-nps.pdf

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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.'

Expansion in the southeast is not required and Gatwick would have been the wrong decision for the Government, we explain why:

Gatwick is the wrong side of London: Gatwick does not benefit or connect by rail or air with the north; freight would have to pass Stansted, Luton and Heathrow to reach Gatwick while increasing cost and carbon foot print; passengers would have to pass the same airports, as they do now to reach Gatwick to fly overseas on budget airlines.

Gatwick is reliant upon European holiday travel: It exports UK residents and their money out of the UK via low cost budget holidays and airlines; Gatwick brings the least into the UK economy even with the downgrading of Heathrow's GDP contribution by the DfT; Gatwick's increase in travellers is still far lower than other UK airports – runways to the north of London have witnessed greater increases than Gatwick for 2016/17; Gatwick's unsuccessful attempts to increase long-haul business only increases the export of sterling overseas in search of winter sun; this is why Gatwick is known as a 'bucket and spade' airport. ▢ It therefore exports more money out of the UK purse and does not benefit the UK.

Gatwick does not connect with the rest of the county and would have increased the north south divide issues; it would have forced more northern travellers to West Sussex to fly on low cost holidays removing growth from northern airports and bringing wealth and business to the north which is

desperately requires. AEF also illustrated that expansion in the southeast would lead to a reduction of regional airport growth due to breaching climate change targets. ⁹ Gatwick had breached air quality before but did again immediately after the final report was delivered by the Commission as reported in the GATCOM reports on the A23.

Rail and Road implications for the southeast:

Gatwick has dreadful and/or unaffordable connectivity: It only one road and one railway line, and both accesses are congested daily with the current growth in traffic (never mind any expansion). Neither can be expanded for technical reasons; Gatwick adds to the congestion by only promoting travelling to visit London, Gatwick seeks only to sell train tickets to London in the baggage hall and not to tourist locations close to it; it is cheaper to fly to Europe from Gatwick than to travel by train from Gatwick to London; the M23 reduces to a single lane after just 16 miles from Gatwick – Hyde Park Corner is still a further 45 miles. Scheduled buses take 1 hour 52 minutes and taxis are estimated to take 50 minutes. Both are approximately twice the time it takes from Heathrow to London while also increasing pollution and congestion. As the Advertising Standard Authority made clear in 2016 Gatwick is not in London and detailed that it was quicker to reach London from other airports than Gatwick.

Gatwick and councils subsidies travel: Cornwall council underwrites the route from Cornwall airport to Gatwick provided by Flybe; Gatwick, until recently, subsidised Metro bus to bring staff from Eastbourne to Gatwick but no staff were found to want to use this service or work at Gatwick; expanding Gatwick would impact Southampton, Bournemouth and other regional airports taking away local employment, local revenue and increasing every worker's carbon footprint by forcing them to travel to seek employment and at a low-cost-flight airport outside of their home county; Gatwick faces the staffing problem of full employment in in all the counties that surround it; Gatwick is, thus, seen by other businesses as a drain on quality staff and local infrastructure.

Gatwick profits from retailing and car parking: For every pound spent by air travellers, rail travellers and workers using Gatwick facilities (restaurants, car parks, retail outlets, etc) Gatwick Airport shareholders profit, BUT how much corporation tax has Gatwick paid over the past 4 years? None; Gatwick does little to bring revenue into the areas that surround it; Gatwick does not promote or benefit the tourist areas that surround it in East Sussex, West Sussex, Kent and Surrey that are crying out for investment especially the UK coastal regions and heritage sites; Gatwick is a competitor to the coastal regions as a provider of budget holidays destroying the historic UK coast trade which Gatwick does nothing to promote. B

The CAA also proved that UK holidaymakers travelling abroad spend more money overseas than any visiting the UK.

Gatwick does not attract business travel due to location: The airport is simply in the wrong place for business travelers. It is not convenient for London as it is in West Sussex; it takes longer for passengers by rail or road to reach London than from Stansted, Luton, or Heathrow.

Gatwick expansion is not supported: 10 MPs in the immediate location of Gatwick do not support expansion; all local authorities, parish and town councils (bar one in East Sussex) do not support expansion; Gatwick is surrounded by 16 action groups in Sussex, Surrey and Kent; Gatwick is not seen as a good neighbour nor one to be trusted.

Environmental impact in the southeast:

Gatwick is surrounded by tranquil areas of outstanding natural beauty and conservation areas and villages: Gatwick produces light and noise pollution day and night; it destroys tranquility in East Sussex, West Sussex, Surrey and Kent; Gatwick increases the pollution for communities from roads around it through traffic congestion, and by staff and holiday traffic travelling from as far away as Tunbridge Wells, Brighton, Southampton, Heathrow area, etc due to the full employment locally and the lack of rail links. ^ε

The Airports Commission found that pollution would rise at Gatwick greater than at Heathrow due to the lack of infrastructure. It could also be suggested that the removal of ancient woodlands, floodplains and nature's natural way of cleaning area would have been compromised as over 40,000 new houses would have been required near the airport on green land. ^h

Gatwick expansion would destroy more Grade II listed buildings than HS2: Gatwick would destroy ancient buildings and woodlands, and divert the River Mole; the destruction of natural habitat increases pollution concerns, causes flooding by removing nature's way of dealing with floodplains and surges in water flow as in the River Mole, which is known as a 'flash' river. ^{c/f}

Gatwick owners are not here for the long-haul: Gatwick is foreign-owned by a New York-based private equity company and it seeks to increase the value of the asset and then sell it. It has not paid corporation tax for 4 years and its sale will not benefit the UK purse due to its set up structure.

Gatwick management can not be trusted: spoke at the CAGNE AGM on the 3rd March 2017 and confirmed to residents that a second runway was not being discussed or desired as not work was underway to achieve this. On Sunday 12th March 2017 the CEO of Gatwick Airport wrote of Gatwick being ready and waiting for expansion. This clearly illustrates that the Gatwick management cannot be trusted with expansion or deal with the current levels of noise complaints and anger towards their lack of accountability to communities of Sussex, Surrey and Kent.

National Policy Framework:

1 4.24 The call-in criteria for the Secretary of State is set too high to be possible around Gatwick and thus is seen as unfair and not feasible to be a route communities can take to object to an airspace change

A JR is too costly for most communities and thus prohibits residents from seeking a fair and equitable conclusion to the sponsors desire for greater profits from increases in aircraft movements or changes to airspace ie the removal of NPRs or new routes.

Health impact costs need to be factors as an equivalent to aviation (economic) growth.

4.22 'changes deemed to be of national importance' we would question this as it would seem they are of only aviation profits importance and do little for the UK residents that suffer the fallout of aviation in noise, emissions and health implications

4.37 The 16hr averaging of noise is not acceptable as the frequency per hour of noise events is not a consideration by averaging noise out over 16hrs. The 54dB LAeq 16hr is totally inadequate as it does not accept that Gatwick impacts in a 30 mile radius nor does make differentiation between rural or urban areas to impact of aircraft noise.

4.23 Noise should be the number one consideration up to 6,000ft especially in rural areas. Airports should be permitted to take this stance when communities are being particularly impacted by aircraft noise.

4.27 Heathrow has impact on Gatwick flight paths and thus Heathrow, arrivals to Gatwick east as well as Gatwick arrivals and departures impact residents surrounding Gatwick, especially to the west. These communities suffer from unfair aircraft noise where they receive no respite 365 days a year 24 hours a day.

4.34 We re-iterate that the CAA are not seen and are not independent. The new Independent Commission on Civil Aviation Noise is seen as a 'puppet' as those already selected for the DfT ANEG communities are not permitted to have a fair voice on this nor are they permitted to have details of those 'named individuals' that sit on the ANEG. This is not transparent to communities and thus we see ICCAN no different and just another tool to move airspace change and grow aviation with no input from communities as those that sit on ANEG were selected by are out numbered by aviation-favoured, 12 aviation and two non.

7.10 NPR – Noise Preferential Routes – are very important around Gatwick as residents moved to areas outside of the NPR and paid a premium to be away from aircraft noise. Due to the introduction of PRNAV much has already been lost as well as the gradual move of the centerline on the BOGNA route without any form of consultation. To remove the NPRs would subject new communities to constant aircraft noise without any form of compensation for

there loses of house price and quality of life. There are no benefits to these residents to have the NPRs removed.

Residents that moved under an NPR were aware of the flight paths and thus paid a reduced price for homes. To place Gatwick in charge of airspace is similar to putting a 'fox in charge of the hen house', communities would suffer and Gatwick can not be trusted as previously stated.

A few nautical mile move in airspace terms has a major impact on those on the ground when PRNAV is introduced, we site Route 5, 3, 2, 4 and BOGNA as examples of the anger and upset caused by Gatwick at the introduction of PRNAV to all departure routes in May 2014.

If a house has never had aircraft noise and then it is introduced it will go from 30-35dB to over 70dB with a frequency of every 1-2 minutes per hour. This is a significant change and one that can only be made with full compensation for lose of house value some 30 mile radius.

House prices in London do not suffer the same from aircraft noise as rural homes around Gatwick. Houses in urban areas have more background noise and buildings to absorb aircraft noise unlike rural areas.

Aviation is destroying the planet: At what cost does the Government ignore the damage aviation has on climate change? Gatwick uses up carbon footprint to export leisure traffic out of the UK that brings little benefit to the UK purse or to climate change targets; aviation should be made to pay like other industries with a green tax, duty and VAT; the Government could receive an additional £11.4bn a year; the 1997 Treaty of Amsterdam had the principle of 'polluter should pay', however, aviation continues to escape this; the Air Passenger Duty raised £3.2bn in 2014/15 but ADP rates would need to be more than four times their current level to match the value of the industry's blanket exemption from fuel duty and VAT; the Airports Commission's own analysis indicates that to contain aviation emissions within the limits recommended by the Committee of Climate Change, air fares would need to increase by an average of £63 by 2050.^a Gatwick would have the same impact on climate change as Heathrow whilst bringing the least into the UK purse as it specialises in exporting UK leisure travellers.

References:

- a www.AW/AEF analysis based on April 2014 fuel duty rates and comparative total fuel consumption for road transport and UK civil aviation 2014.
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- b ¹ Moodys Investor Service 14 December 2014. https://www.moodys.com/research/Moodys-A-new-runway-will-have-mixed-credit-implications-for-PR_314716.
- c www.gacc.org.uk
- d www.cagne.org/holiday
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Seeking a fair and equitable distribution of arrivals and departures in the east and west of Gatwick for West Sussex and Surrey

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