

CAGNE

**Communities Against Gatwick
Noise and Emissions**
**Umbrella Aviation Community and
Environmental Group for Sussex and Surrey**

20th September 2019

It is clear from the Gatwick scoping reports that they only care about their boundary

Gatwick seeks to put pressure on local authorities to force them to support expansion plans in the most recent scoping reports.

The recent scoping reports submitted by Gatwick Airport (2nd September) give a clear indication of the management's criteria when it comes to using the emergency runway as a second runway by the planning process of a Development Consent Order (DCO).

Gatwick using the DCO process saves them considerable funds compared to an application to build a new runway, this process will avoid full public until 2021 and national parliamentary scrutiny and will not provide the necessary substantial investment in infrastructure to support such a large-scale development for local area and local authorities.

To summarise, the scoping details leave many of the negative issues that the Airports Commission identified still true today and thus Gatwick's expansion plans must be rejected:

- We believe it does not meet government policy of making best use of existing infrastructure as there will be over 50% new build
- It does not reduce aircraft noise but increases it by adding 90,000 planes a year to the 280,000 currently
- It does not provide any new infrastructure to access the airport – the Smart M23 is for current southeast growth
- It does not improve air quality – monitors only close to Gatwick boundary.
- It cannot improve the railway line to substantially increase capacity – Windmill Junction improvements are for current growth, expansion would add 3.25 million passengers a year
- It will damage areas of outstanding natural beauty, heritage and wildlife migration

- It does not present a 'fit for purpose' economic case for growth, growth will be to the detriment of other businesses close to the airport and surrounding areas
- It cannot provide a readily available workforce causing inward migration of workers looking for healthcare, schools and amenities
- Sharing benefits is not donating money to local authorities and charities. This is not acceptable compensation for the damage to resident's wellbeing, homes and the planet.
- It offers no new waste facilities to deal with huge increases in passengers and workers questioning the current waste facilities
- It does not meet the pledge made by nearly all neighbouring local authorities to climate emergency, as it offers no reduction in CO2 – aircraft are most contaminating at the point of departure and arrival. Gatwick cannot be carbon neutral as it flies fossil fuel planes.

Recommendation - Local authority members and officer should identify all the relevant and significant local issues that would need to be addressed if the scheme went ahead as the examining inspector then has to give weight to these reports in examining and deciding on the application and on our counties blight.

The Gatwick proposal would mean extensive engineering to make it feasible for the emergency runway to be used as a second runway alongside the main runway questioning if this application is in fact compliant with government policy 'Making best use of existing infrastructure.' It would also require land outside their 760 hectare boundary to total 838 hectares. This will also cause years of construction traffic operations to and from the site adding to congestion and pollution.

The scoping reports set the boundaries firmly at the edge of Gatwick's current curtilage ignoring the wider ramifications of Gatwick expansion, which will have to be dealt with by taxpayers and local authorities.

Flooding, noise baselines, road infrastructure, land grab and air quality monitoring are all limited to the Gatwick boundaries leaving us to deal with the fallout of this massive non green friendly expansion plan for 74 million passengers on our roads and a railway line that cannot be expanded (13m extra passengers annually).

5.186: 'The Secretary of State will need to consider proposals put forward by the applicant to mitigate adverse effects on the water environment, taking into account the likely impact of climate change on water availability, and whether appropriate requirements should be attached to any development consent and / or planning obligations.'

These documents are ignoring the communities that will suffer from flooding (figure one), a decline in air quality, substantial increases in noise and congested roads and railway line. Nothing has changed since Gatwick was

turned down by the Airports Commission, in fact matters have got worse as 106 money is not meeting the pressure of Gatwick Airport's 'drip drip' growth to date.



Air Quality – The UK has the Air Quality Strategy, which has a role in combating existing pollution and attempting to reduce future pollution. Under this strategy, each authority is obligated to monitor the air quality in their local area and measure their results against the objectives set out by the governing legislation. Gatwick

continues to breach two air quality monitors close to its boundary. A report being produced on air quality between the M23 and Gatwick Airport initial findings are that the harmful 2.5 particles are coming from Gatwick Airport whereas the larger particulates are coming from the M23. The smaller particles are not currently monitored by Gatwick Airport.



Transport – (figure three and four) Predictions by the Office for National Statistics in 2018 suggest that by 2026 the populations of London and the South-East will have increased respectively by 774,000 and 554,000. By 2035 the increases from 2016 for the two regions will be 1,266,709 and 974,709.

In 2017, 54.9%* of passengers used private car, taxi or car rental; 44.9% used rail or bus/coach to reach Gatwick. The Master Plan claims the airport “would be able to add between 10 and 15 additional hourly aircraft movements in the peak hours, which could deliver up to 70 million passengers by 2032.” This could mean around 25 million more passengers than in 2017/, another 10 million passengers using trains and 12 million using cars, taxis and private rental each year – or 33,000 additional vehicle movements per day plus which could be over 11 cubic meters of freight per large plane, potentially 84 extra lorries a day. Gatwick state that based on the future predicted mix of aircraft types and the amount of freight that is carried in the belly holds of passenger aircraft, it is predicted that cargo throughout will increase from **157,500 tonnes in 2018 to some 227,100 tonnes in 2038**.

We would also suggest in view of the very small area currently handling the freight that new extensive facilities will have to be built outside the current curtilage of Gatwick.



Network Rail is struggling with the natural growth in rail passengers now. Even with the recent investment in the station predominantly by taxpayers the line cannot be expanded due to physical restrictions, so no additional trains can be added, yet Gatwick's proposed expansion would add 3.25 million passengers a year to the Brighton line by 2022/23.

* Jeremy Early

Local Authorities - Councillors have a duty of care to the areas they are elected to represent not Gatwick Airport management.

As Gatwick propose robotic baggage handling, additional car parking for 36,000 cars, airline stewards cleaning the planes, computerised air traffic control from Southampton and automation of check in and parking. Not all jobs are going to be top executive paid positions so those on zero hour contracts might find themselves out of work due to Gatwick saving money long term by using computers.

1.2.7 109: *'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.'*

The scoping reports offer nothing in new sustainable or green transport. One of the reasons Gatwick was dismissed by the Airports Commission was the lack of capacity on the road and rail network surrounding Gatwick. (figure two)

Climate change – Gatwick state that as a result of anthropomorphic release of greenhouse gases is a global phenomenon. According to the Institute of Environmental Assessment and Management (IEMA) 2017 guidance "Environmental Impact Assessment Guide to: Assessing Greenhouse Gas Emissions and Evaluating their Significance", global climate is **sensitive enough that any emission of greenhouse gases would be significant**.

In June CAGNE launched pledge to fly less, an environmental scheme aimed at educating the consumer to the damage flying is having on our planet. In a September 2019 survey most people (66.9%) in the UK back limits on flying to tackle climate change:

- 28.2 per cent said air travel should definitely be limited, with
- 38.7 per cent saying it should probably be restricted.
- Just 22.2 per cent felt there was no need for limits, and 10.8 per cent said they did not know

Read more: <https://www.newscientist.com/article/2216743-most-people-in-the-uk-back-limits-on-flying-to-tackle-climate-change/#ixzz5zyyDTGQ5>

Gatwick also propose an Increase by **at least** 10,000 per year, the number of air transport movements of cargo aircraft transport to and from the airport by road.



False Economics - As there is a lack of workforce locally Gatwick propose to bring in workers from coastal regions adding to the congestion on the roads as rail travel is expensive. Lack of work force was one of the reasons the Airports Commission found in favour of Heathrow.

Aviation is a volatile industry reliant upon the consumer having funds to fly overseas and increasingly it is facing increases in fuel prices;

- Airlines detail that there is already unwarranted passenger capacity and thus airlines are failing, this specifically goes against the government's predictions in the green paper for leisure growth;

- Aviation growth is not sustainable in its present form due to unrealistic ticket pricing and lack of resilience which will inevitably lead to more airlines in financial difficulty, eg Monach, FlyBMI, WOW, Germania airline filed for bankruptcy, Ryanair posts first loss since 2014 and now Norwegian Airlines have significant financial issues;

It should be noted that all employees/ management of Gatwick, airlines and contract workers benefit from the shopping malls of Gatwick Airport with reduced prices leaving the local high street wanting as Gatwick identify that the majority of workers live local to the airport and thus should shop local helping the local economy.



Housing – The proposals by Gatwick are unsustainable for local areas. Crawley Borough Council has already warned neighbouring authorities of the housing shortfall of 340 houses increasing to 839 with a short fall of 440 without Gatwick expansion plans. The National Planning

Policy Framework (NPPF) was published in 2012 and updated in 2018 and 2019 (Ministry of Housing, Communities and Local Government, 2019a) housing and infrastructure to support Gatwick's proposals are key.

The Ifield housing development, put forward by Homes England, makes many assumptions such as planned new roads whereas the reality is there is no funding available.

Consultation - The pre-consultation conducted by Gatwick Airport in October 2018 was restricted to areas not overflowed and at Gatwick Airport itself. Thus it could be found to be biased towards the applicants. Even on these terms and lack of background details provided, Gatwick was only able to secure two thirds in agreement to using the emergency runway as a second runway.



Aircraft Noise – (figure five) Gatwick already blights Sussex, Surrey and Kent, rural communities with unacceptable levels of aircraft noise day and night with over 280,000 movements a year. Much is said about aircraft becoming quieter and yet

today when planes are meant to be significantly quieter than their predecessors the Department for Transport recognise that tolerance of aircraft noise has dropped from 57 decibels to 54 decibels. Gatwick is seeking to add 90,000 flights a year by 2032.

The biggest percentage of complaints about noise is the removal of tranquility. Gatwick now propose to increase noise levels by approx. 40% annually removing any respite or quiet periods that communities may currently witness. The proposals will also mean an increase in ground noise and noise to the north of the airport from the continuous use of the emergency runway alongside the noise from the main runway that is in close proximity to housing and new housing estates.

5.252: 'The Secretary of State will also consider whether the applicant has consulted on the details of a community compensation fund, including source of

revenue, size and duration of fund, eligibility, and how delivery will be ensured.'

Gatwick has shown that they cannot mitigate noise. Their Arrival Review focused on a specific area of concern and the well publicised Noise Management Board has also failed.

Donations/ sponsorship to local authorities and/or charities is not compensation for those affected by the significant increase in aircraft noise.

The plans offers speculation about planes reducing noise with little in the way of evidence to substantiate this, even so a 1-2 decibel reduction is not significant to the human ear. It is the frequency of the planes that is causing issues for mental health, wellbeing, house values and light pollution that affects humans and wildlife patterns alike.

The Government published its consultation paper 'Aviation 2050' in December 2018 :

*3.1.21 Paragraph 1.21 further states that: 'This is why the government is supportive of the development of a third runway at Heathrow Airport, which could deliver up to £74 billion worth of benefits to passengers and the wider economy. It is also supportive of airports throughout the UK making best use of their existing runways, **subject to environmental issues being addressed.** However, there is a need for clarity on what the future framework will be for providing additional capacity to meet demand, while **managing environmental and community impacts.**' 'The government expects the industry to show continuing commitment to noise reduction and mitigation as part of its contribution to the partnership for sustainable growth'.*

We do not believe that Gatwick has or can in the future address the noise issues.

Gatwick is now undertaking secret meetings (GATCOM) with appointed representatives in favour of expansion and local authorities that benefit from Gatwick funding, excluding the very communities that are impacted and will be impacted further. (The scoping report details meetings in April with local authorities and GATCOM 20th September)

Gatwick's proposals are in addition to Heathrow, Bristol, Stansted, Luton, Southampton, and northern airport expansion,

*5.82: 'Any increase in carbon emissions alone is not a reason to refuse development consent, unless the increase in carbon emissions resulting from the project is so significant that it would have a material impact on the ability of **Government to meet its carbon reduction targets, including carbon budgets.**'*

Gatwick alone would add **nearly 1 million tonnes of carbon** from air operations every year according to Aviation Environment Federation. In addition to this would be the carbon created from travel to the airport by 74m

passengers, Gatwick currently uses a fictitious format to state it is carbon neutral whilst flying over 280,000 fossil fuel burning planes a year. They do this by obtaining their electricity from a supplier of 100% renewable; this would seem to be almost the entire basis of their claim.

Waste - Gatwick offer no additional waste facilities to deal with the additional workers, hotels, offices, industrial units, housing, 74m passengers and freight and taxi workers. It also adds to the demise of air quality by operating an incinerator.

A DCO 1.3.24 5.146: *'Where necessary, the Secretary of State will require the applicant to develop a resource management plan to ensure that appropriate measures for sustainable resource and waste management are secured.'*

Biodiversity – Elevated rural areas, areas of outstanding natural beauty, areas of specific wildlife habitats, surround Gatwick. Yet it is allowed to blight these areas as well as pollute. Ashdown Forest is a fine example of one of the several European designated sites within 20 km of Gatwick Airport: Ashdown Forest SAC and SPA as well as numerous heritage sites surrounding Gatwick. Unfortunately Gatwick's scoping report diagrams ignore these facts.

Light pollution is known to affect wildlife habits and cause issues for migrating species like the European nightjar and Eurasian hobby Falco Subbuteo. These species migrate over EEA states to their winter ranges in southern Africa but are with us during Gatwick's peak summer time.

Mole Gap to Reigate Escarpment SAC is designated for its grassland, scrub and wooded habitats, with great crested newts and Bechstein's bats.

5.199, 5.200, 5.202: *'The Secretary of State will take into account: the desirability of sustaining and, where appropriate, enhancing the significance of heritage assets; the contribution of their settings; and the positive contribution their conservation can make to supporting sustainable communities – **including to their quality of life, their economic vitality, and to the public's enjoyment of these assets.***

Paragraph 1.27: 'Applications to increase caps by 10mppa or more are deemed nationally significant and would be considered as Nationally Significant Infrastructure Projects (NSIPs) under the Planning Act 2008 and as such would be considered on a case by case basis by the Secretary of State.'

1.4.5 Paragraph 1.29: *'Therefore the Government is supportive of airports beyond Heathrow making best use of their existing runways. **However, we recognise that the development of airports can have negative as well as positive local impacts, including on noise levels.** We therefore consider that the relevant planning authority should judge any proposals, taking careful account of all relevant considerations, particularly economic and **environmental impacts and proposed mitigations.***

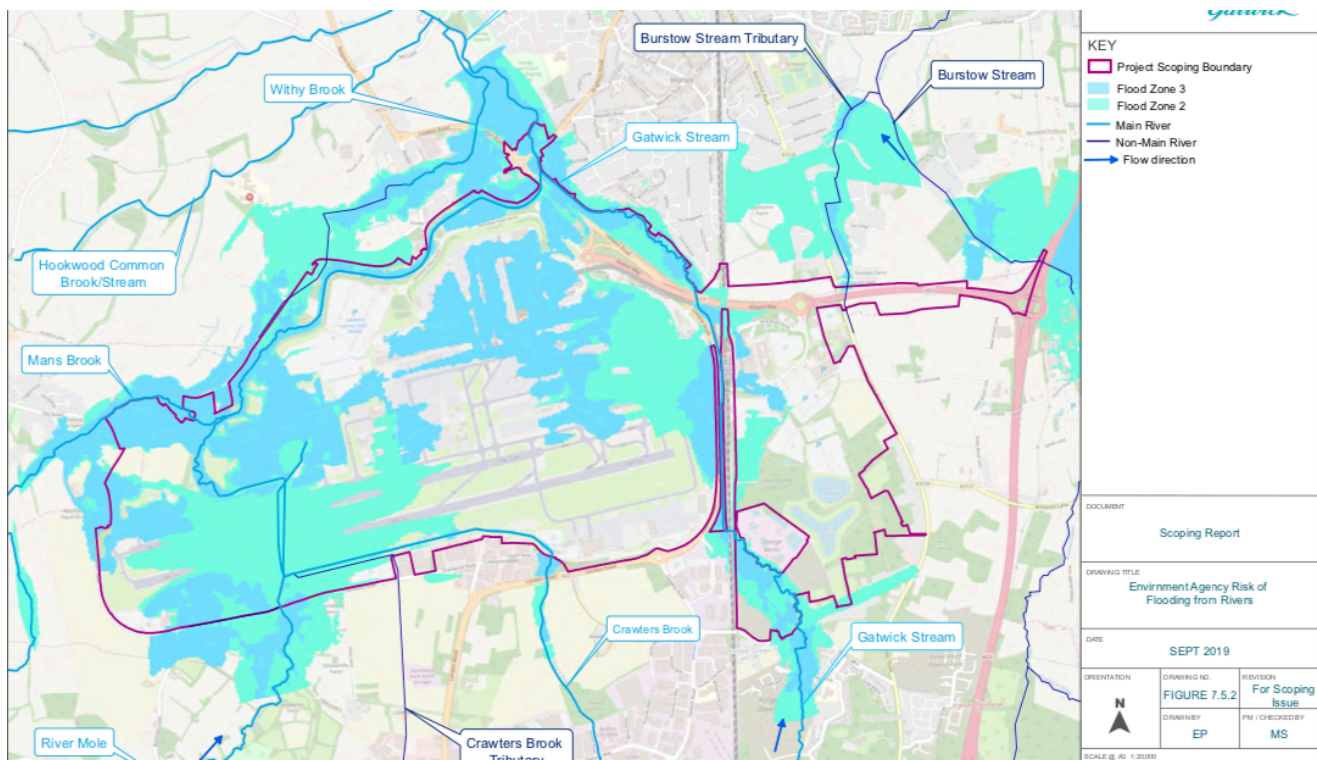
Why you need to strongly object - Much is made of the capacity predictions by the Airports Commission already being met by Gatwick Airport. But the Commission focused its work on Heathrow vs Gatwick and as such expansion at other regional airports was not necessarily a consideration.

Current policy allows all airports to maximise use of current facilities, but Gatwick's DCO goes beyond this as it will have to extend the emergency runway to the north, remove a taxi way and part of a building as the emergency runway cannot be used simultaneously with the main runway as they are too close together. Aircraft will also have to cross the emergency runway from the main runway to access the terminals.

Aircraft already have to taxi burning fuel for some 20 minutes to reach the main runway from the south terminal. Aircraft also have to travel long distances to reach piers this can only get worse with Gatwick's add-ons.

Extensive engineering of new taxiways, terminals, etc to facilitate its use of the emergency runway will be required, as such it should be deemed as a new runway and so not compliant to current government policy.

Figure One – boundary of Gatwick's concerns in purple – flooding



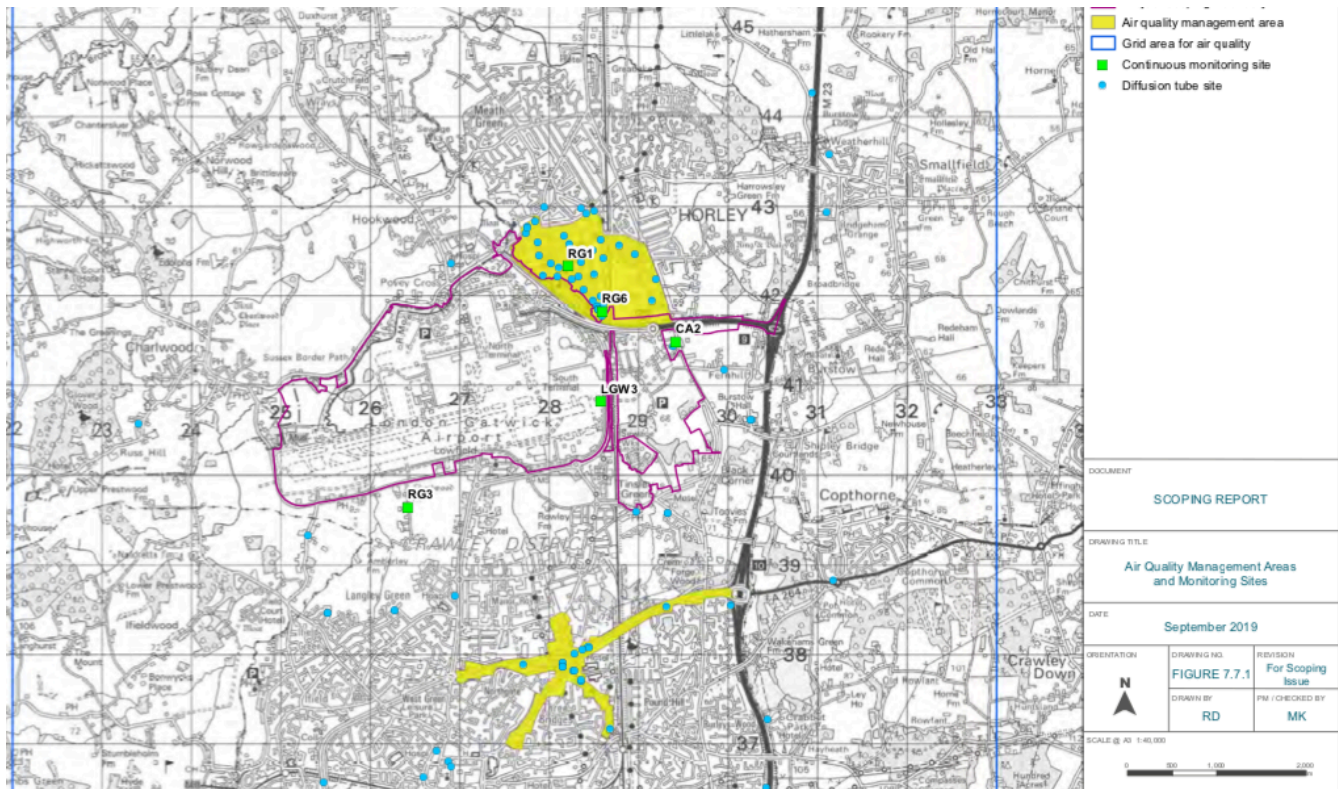


Figure two – air quality monitors all close to the airports boundary except those operated by Crawley Council

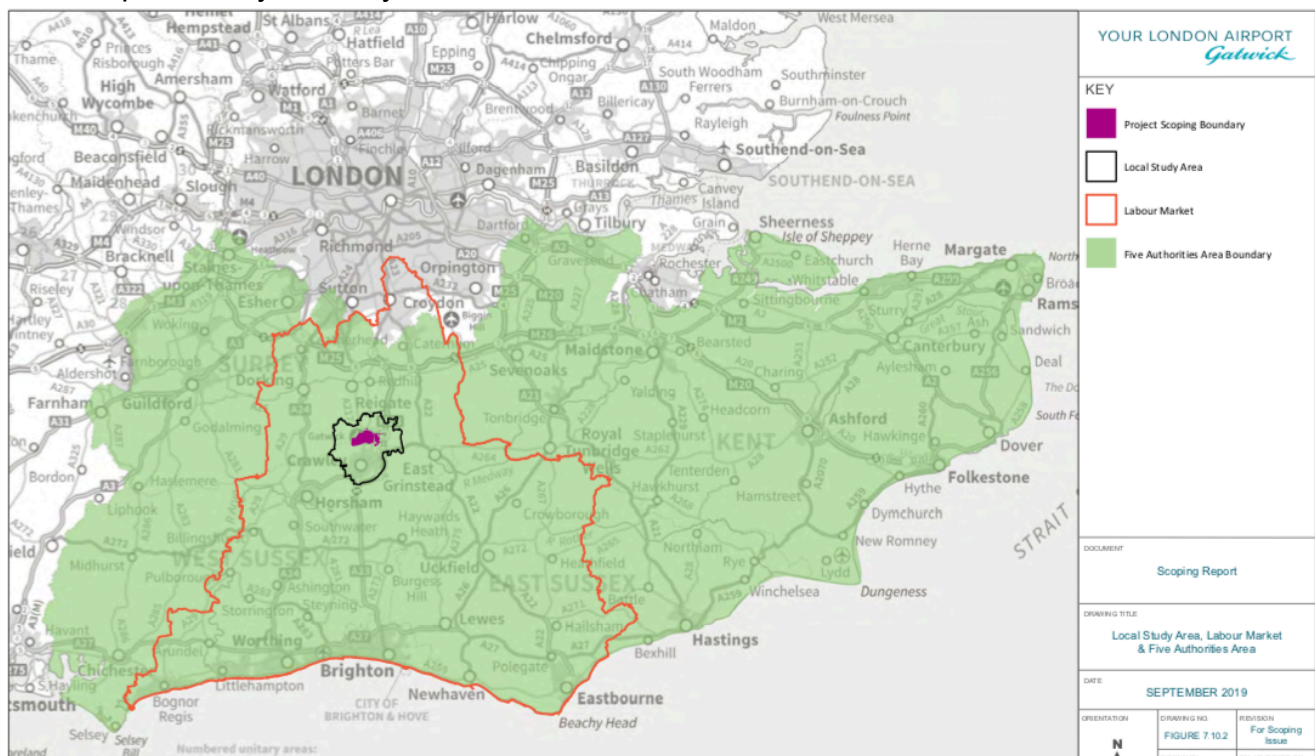


Figure three – green is area from which Gatwick intend to migrate workers from by road and rail

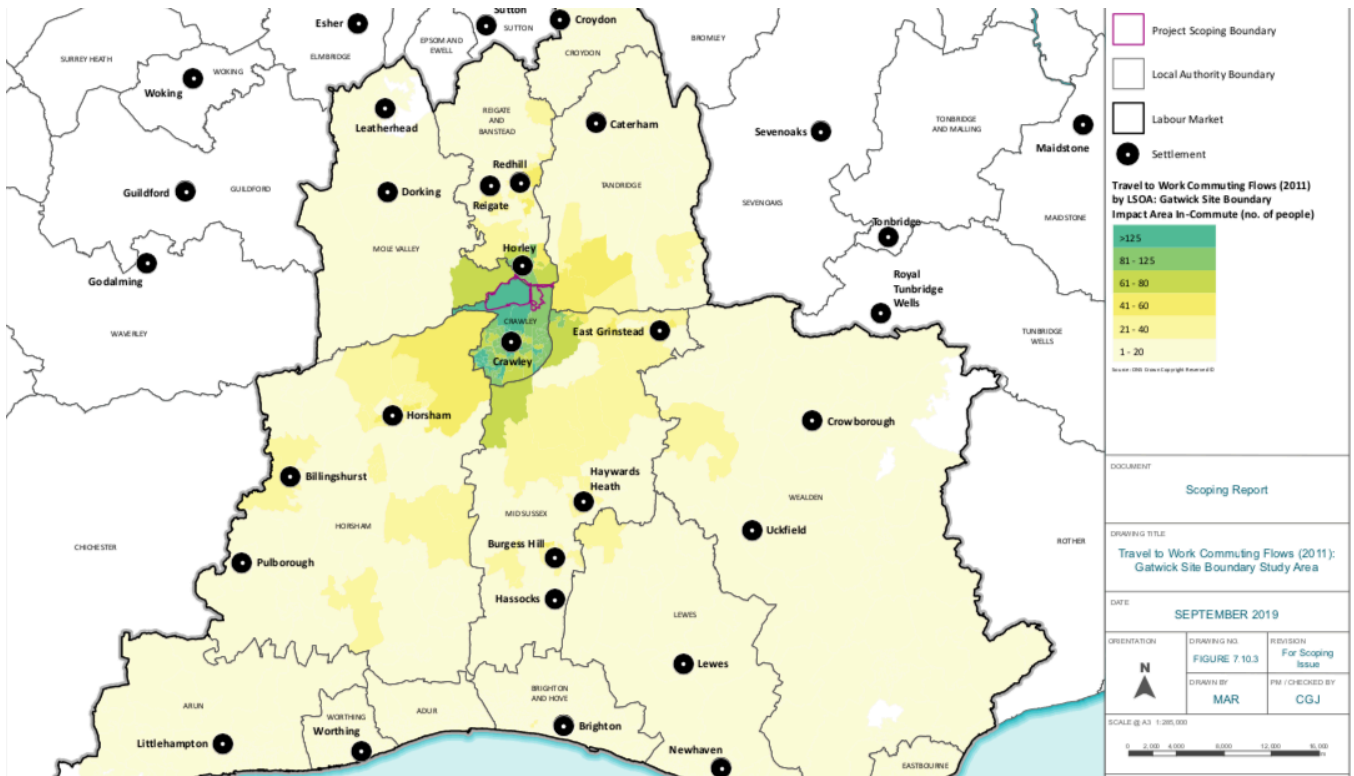


Figure four – areas workers currently migrate from to work at Gatwick. Note densely populated area directly around the airport so where will the new workers live and migrate from, see map above



Figure five - Noise contours that average out the noise and do not cover the areas impacted currently by Gatwick's 280,000 aircraft movements annually