



PlaneWrong
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1st February 2015

To: Airports Commission

PlaneWrong is a non-political group set up by residents in September 2014 to campaign for a reversal in the recent changes to Gatwick Airport Flight Paths. We represent communities living in areas north of Gatwick Airport including Dorking, Reigate, Redhill and surrounding villages.

Whilst the focus of our campaign has been the impact of recent changes to flight paths, we also have a remit from our members "to provide a view on any proposals relating to a second runway at Gatwick Airport."

The main concern of our membership is the noise and environmental impacts of airport expansion on local communities and rural areas, which by their very nature, tend to be under-represented.

PlaneWrong would like the following views to be considered in respect of the three short-listed options.

Question1 Comments in relation to shortlisted options

It is our view that expansion at Gatwick Airport does not meet the objectives of the Airport Commission as set out in Table 2.1 for the following principle reasons.

Impact to the environment and quality of life

Gatwick is surrounded on three sides by Areas of Outstanding Natural Beauty – the High Weald AONB and the Surrey Hills AONB – each visited by over a million people every year. This area includes a SSSI and as identified by Natural England, areas which support a wide range of habitats.

The area around Gatwick is further characterised by an abundance of small country villages.

The Commission recognise that 'there are areas around Gatwick that are rural and have high levels of tranquillity that would be adversely impacted by new development at the airport.' The effect of increased noise levels has a greater annoyance in tranquil areas with traditional low ambient noise levels. The effect of noise on two different communities cannot be compared purely on terms of numbers affected but on the increased annoyance value.

The Commission has published an “indicative” map¹ of the new flight paths with a new runway. However, as the actual flight paths are only decided after permission is given to expand an airport, it seems that this map represents the most likely outcome; it is proposed that the runways would operate in ‘independent mixed mode’ with each runway handling both arriving and departing aircraft. Aircraft using the existing runway would use the two existing terminals and would mainly follow flight paths (R26DVR/BIG/CLN/LAM and R08KENET) to the north doubling the number of aircraft on a route that is already a subject to a consultation process and has created “unprecedented”² complaints from the public regarding noise pollution.

Increased noise and pollution levels will also have an impact to local wildlife and biodiversity.

Of particular concern are increased concentrations of nitrogen dioxide levels, known to damage foliage, decrease plant growth, and reduce crop yield. Deposition of nitrogen compounds can lead to soil and water acidification to which lowland heaths are particularly sensitive (DEFRA). Nitrogen oxide can also cause eutrophication of soils and water, which alters the species composition of plant communities and can eliminate sensitive species.

The SSSI sites include lowland woods and shrubbed heath (Natural England), a habitat for breeding birds. Noise impacts the ability of birds to settle as they cannot hear other birdcalls.

Location and Transport links

A new runway at Gatwick would worsen the north-south divide. Gatwick’s location does not easily serve the north of the UK. There are no direct rail links to the north of the United Kingdom. Road links via the M25, even with the introduction of smart motorway technology, will fail to supply reliable road connections. This alone will cause missed flight, lost business and result in stress and frustration for all involved.

The M23 stops well short of central London with no possibility of improvement towards London. The country lanes surrounding Gatwick will be used as unsafe “rat runs”, destroying rural environments and increasing the risk of fatal accidents.

Gatwick does not have an underground link to London similar to the one at Heathrow that takes passengers directly into the Terminals (a station exist in terminal 1, 2 and 3, and one each at Terminal 4 and Terminal 5).

The Gatwick Express shares one of the busiest railway commuter lines in Europe. It will not cope with the extra demands. Improved capacity for this line will be impossible without huge financial investment and the destruction of thousands of homes and businesses. Heathrow however will gain from improved rail links that are under development (close to completion) into the city due to Cross Rail. It will also be able to link via the London underground to HS2 and the north.

¹ NATS Support to the Airports Commission Appraisal Module 14: Operational Efficiency: Airspace Efficiency Report.

² Letter from Mark Swan of the CAA to Sir Paul Beresford 17th October 2014

Hub Airport

The business community and the aviation transport industry require a hub airport. This is recognised in Chair's Foreword to the Consultation Document of November 2014 and signed by Howard Davis. He states in the first paragraph of the document "Our argument is that one new runway, with the capacity to handle around 200,000 aircraft movements a year, will be needed to maintain the UK's connectivity and hub status, which is what our brief from the Government invites us to secure".

Expansion at Gatwick does not fulfil this criteria. Heathrow is already a recognised hub for the UK and Europe; creating a similar hub in a different location separated by the transport barrier call London will not work and will give other European hubs such as Paris-Charles de Gaulle a boost to become the major European hub.

Employment and Housing

The area around Gatwick has very low unemployment so new employment will create an influx of workers. Huge development will be needed for housing and associated infrastructure in an area with some of the highest house prices in the UK including the South East. A lack of space will cause an unacceptable encroachment onto the Greenbelt. This goes against all existing government policies and aspirations.

Q3. Comments on how the Commission has carried out its appraisal

We welcome the clear approach being set out by the commission. However, the lobbying and advertising by Gatwick Obviously is not consistent with the rational approach being undertaken by the commission.

The commission has invited responses to the consultation from the general public. However, it is not clear how wider representation of the communities impacted is being sought or indeed how aware most people are about how they might contribute to the consultation. This means local communities may be under represented in the consultation process.

Conclusion

Gatwick is not a suitable location for increasing the UK's long-term aviation capacity or to act as the United Kingdom's primary aviation hub for the reasons given above.

Fran Flammiger

Vice Chair
PlaneWrong