



CRISPIN BLUNT MP
Member of Parliament for Reigate

HOUSE OF COMMONS
LONDON SW1A 0AA

Gatwick Airport Limited
Draft Master Plan Consultation

Our reference: CB/GO

by email: gatwickdraftmasterplan@ipsos-mori.com

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9th January 2019

Dear Sir/Madam,

Gatwick Airport Draft Master Plan Consultation Response

This letter, from the undersigned MPs who are full (i.e. non-governmental) members of the Gatwick Co-ordination Group (GCG), constitutes our joint response to the Gatwick Airport Draft Master Plan Consultation.

Some of the GCG MPs met with Sir David Higgins, Stewart Wingate, and Tim Norwood in Westminster on 5th December for a presentation on the Draft Master Plan and subsequent Q&A. This was very informative and we are extremely grateful for the time committed by the senior leadership team at Gatwick Airport Limited (GAL).

The Draft Master Plan appears a more reasonable proposal than the Second Runway proposal however we have the same concerns about the scale of the expansion proposed, in terms of its impact on rail and road transport infrastructure, new homes, soft infrastructure pressures, and noise and air pollution.

We are not convinced by the projections for local economic growth outlined in the proposals and we also feel that these would be offset by negative environmental local consequences of excessive expansion of the airport, resulting in an overall diminution of the quality of life for local residents. In view of this, whilst accepting that there may be advantages of utilising the standby-runway as a fully functioning second take-off runway, we are of the view that levels of sustainable growth for the airport could be achieved without this. Especially if as we understand, average passenger capacity per aircraft is expected to rise thus enabling more passengers to be processed on the same number aircraft take-offs and landings.

Our specific responses have been highlighted under separate headings below for ease of reference:

National Economic Benefit

The Government has very recently earmarked Heathrow for runway expansion at the expense of Gatwick, a decision that has confirmed a question mark about the national economic advantages of major Gatwick expansion. Whilst there is no stated ambition to build a new runway at this stage, there are concerns that, by emphasising the safeguarding of land for future development of a new runway, this will imply that proposals for a new runway may resurface, resulting in the possibility of Gatwick running three runways simultaneously in the future. We noted GAL's refusal to consider a similar legal undertaking to that given in 1979, to preclude this.

Whilst the projections for UK economic contribution contained in the proposal appear attractive, such expansion may come at a cost to the local environment, infrastructure and employment sectors. This is relevant in that Gatwick is not an international business or regional hub-airport and processes very few 'transfer passengers'. It is a point to point airport, having no significant domestic flight routes, but it is becoming increasingly reliant on low cost carriers (Easy Jet, Norwegian, Vueling, Thomas Cook, etc.) and holiday flights rather than scheduled business flights. Business airlines have taken their business to Heathrow and BA is cutting its routes from Gatwick. It has just 60 long-haul destinations. Relatively modest cargo volumes have recently risen in line with an expansion in long-haul flights. Most Gatwick flights are short-haul and use of the 'standby runway' will only accommodate short-haul aircraft so cargo volume improvement is likely to be a by-product of long-haul route expansion rather than a driving factor. Furthermore, cargo access to and from the airport is impeded by poor road access infrastructure.

Local Staffing and Infrastructure

We do not believe that the expansion plans are compatible with the scale of local infrastructure which would be required to support them, especially as such local infrastructure development would threaten the London Metropolitan Green Belt to the north of the airport. We regularly have reported to us from both the private and public sector that one of the key concerns local employers face is being able to fill vacancies – at every level of the skill spectrum. The increase of airport staff required by this expansion could be met locally where there is very low unemployment or by sourcing employees from Croydon or Brighton where unemployment levels are higher but where, for lower income jobs, transport costs to and from work would be prohibitive. Inward immigration of more locally based staff to the areas adjacent to the airport would put pressure on numbers of new homes and associated services required such as schools, shops, roads, doctor's surgeries, etc.

Ground Access Infrastructure

The existing ground access infrastructure to Gatwick Airport is extremely fragile and already struggling with capacity issues. This begs the question about how increased numbers of passengers and employees will be able to access the airport. Passenger numbers are anticipated to rise from the current 46 mio per year (2017/8) to 60-70 million in 2030. Whilst the Draft Master Plan and Airport Access Strategy Plan (AASP) stress the importance of i) expansion and improvement of Gatwick Airport Railway Station, ii) 'exploring the possibility' of providing additional bus and coach bays, iii) improving car-rental facilities, iv) the benefits of the M23 northwards becoming a 'Smart Motorway', v) improved traffic flow measures on South Terminal entry roundabout, and vi) adding 4,500 new multi-storey car parking spaces and a total of 9,565 additional parking facilities, these do not address the fundamental issue that transport infrastructure to and from the airport is completely inadequate, consisting of one unreliable railway corridor and one major road/ Motorway (A23/M23), both already unfit for purpose and exceeding their capacity.

Rail capacity is a huge issue and resilience remains low. Whilst we are hopeful this might improve as and when the funding and engineering hurdles to execute the planned improvements to East Croydon and Windmill Junction are resolved and put in place, we have concerns that such capacity improvements will not be completed soon, and are needed to address current demand in any case. Producing sufficient enhanced rail capacity to properly service projected passenger numbers to and from Gatwick for the future will require a further step change in rail capacity. No such increase is foreshadowed either by Network Rail or in the consultation document.

Furthermore, 7.4% of Gatwick's passengers come to or from Kent, yet the Transport links are solely reliant on M25. With the level of growth anticipated, which will include many more from Kent Ground Access, proposals should include the reintroduction of direct rail services to Gatwick from Tonbridge and Edenbridge along the Tonbridge-Redhill line.

On the roads, whilst converting the M23 between Gatwick and the M25 junction into a Smart Motorway may partially improve traffic flow on this busy section of motorway, it will not release sufficient capacity to cope with additional Gatwick traffic. The other major access roads, the A23 and the A217 are already congested and running at over capacity. More significantly, apart from the M25 which circumnavigates the city, there is no direct road link from Gatwick into or out of Central London.

Para 4.4.30 of the Draft Master Plan states that GAL will work with neighbouring highway authorities in West Sussex and Surrey on highway issues. We would ask that they work with Kent County Council as well.

Without more investment in major road and rail improvements, congestion and transport delays are inevitable. Furthermore, there is no easy transport link between Heathrow and Gatwick by public transport or road.

Noise Footprint

The Draft Master Plan claims that “with the introduction of quieter aircraft, we expect to see Gatwick’s noise footprint continue to reduce despite the increase in aircraft movements” and that “Initial indications are that aircraft noise generated by the Growth Plan scheme would be broadly similar to today’s level...”

GAL’s noise contours have only reduced in one year since 2013 and its ‘noise footprint’ is calculated on average noise, taking no account of the impact of more frequent noise incidents caused by ‘concentrated’ flight paths. The forecast based on average noise contours and takes no account of frequency.

The Civil Aviation Authority recognises frequency as a key issue when it comes to noise complaints. In order to reduce its noise footprint, frequency of GAL’s overflight needs to reduce. However, there is nowhere in the Draft Master Plan where frequency is referenced, only average noise levels. How will GAL deal with the issues of increased frequency?

Increased overfly frequency also results in restrictions on air traffic controllers to utilise the full Instrument Landing System meaning greater concentration at the farthest parts of the swathe on busy days in the afternoon during the peak season. This goes against the principle of fair and equitable distribution.

Furthermore, assumptions about the speed of introduction of new generation, quieter, larger aircraft are overoptimistic and the effects of quieter aircraft are in any case cancelled out by the increased volume of aircraft.

GAL claims that “The new runway flight paths are expected to be very similar to the current ones meaning that there will be few people newly affected by noise.” This means there will be substantially increased frequency for those living under existing flight paths. Departing flights from the standby runway will take-off slightly further to the north and potentially create a new swathe of noise. Finally, GAL claims that “Night flight noise will reduce because night quotas would stay as now.” These are extraordinary claims in view of the noise nuisance Gatwick already incurs on local residents.

We would welcome any concessions that GAL can offer by reducing night flights and introducing ‘noise envelopes’ to reduce inconvenience cause by increased air traffic prior to the reorganisation of London and Southeast Airspace which we hope will enable steeper and quicker approach and take off routings in the future.

There is no doubt that increasing traffic volumes will increase noise impact for local residents. There is expected to be a 39% increase in the number of flights with 10-15 additional hourly movements and potentially simultaneous or closely-spaced use of the main and the standby runways for take offs. Furthermore, there will be greater use of off-peak periods, increased flights in winter periods and more intensive use of runways at peak periods. This will not be offset by the proposed shift to larger aircraft and higher number of passengers per flight.

Since 2010, Gatwick has 17% more flights but the 57db noise contour is 8% larger by area and 40% larger by population. The Draft Master Plan proposes to increase traffic by 40% but it is not made clear what the expected % increase in different noise contours and population are.

It is our understanding that only under 'second runway' proposals, not the use of the standby runway as proposed in the Draft Master Plan, that Gatwick pledges to use its £46.5m contribution to wider transport and noise mitigation measures. This pledge should also apply for the standby runway as it is, in many ways, proposed to be used as a second runway.


Environmental Issues

The Airports Commission's final report, recommending a new runway at Heathrow, concluded that with a third runway at Heathrow Airport, it would only be possible to stay within the UK's current carbon budget for aviation and shipping if flights from all other airports were to reduce.

Despite more fuel-efficient aircraft, it is clear that the Draft Master Plan would result in an increase in carbon emissions from aircraft. Aviation is the fastest-growing source of greenhouse gas emissions. There is a question mark over how responsible this proposed rate of growth is, given that much of Gatwick's operations serve the leisure industry rather than business, especially in light of the urgency to mitigate climate change.

In summary, we feel that the scale of expansion proposed in the Draft Master Plan is incompatible with the location of the airport and its current ground transport links, and inappropriate because of the increased levels of aircraft noise and air pollution that it would generate. We therefore cannot support any of the options outlined in the Plan unless these issues are addressed first.

Yours faithfully,

A handwritten signature in blue ink that reads "Crispin Blunt". The signature is written in a cursive, slightly slanted style.

Crispin Blunt MP for and on behalf of:

Sir Paul Beresford MP
Sir Nicholas Soames MP
Tom Tugendhat MP

C.c.: Nusrat Ghani MP and Jeremy Quin MP.