

31 January 2015

Airports Commission

By email: airports.consultation@systra.com

Dear Sir or Madam,

AIRPORTS COMMISSION - OPTIONS ASSESSMENT CONSULTATION

This letter is the formal response of the Campaign to Protect Rural England Sussex Branch (CPRE Sussex) to the Airports Commission's November 2014 consultation on increasing the UK's aviation capacity in the long term, seeking views on the three options and the Commission's assessment of them.

CPRE Sussex is a charity covering East Sussex, West Sussex and Brighton & Hove, with 1,621 members comprising individuals and many local amenity groups. It is a branch of the national charity CPRE. Our objectives are:

- to promote the beauty, tranquillity and diversity of the Sussex countryside by encouraging the sustainable use of land and other natural resources in town and country;
- to secure appropriate and sustainable land use, farming, woodland and biodiversity policies and practice, and improve the well-being of rural communities; and
- to ensure the value and benefits of the Sussex countryside are given due consideration by decision makers on issues of planning, land use, rural affairs and transport.

We respond to the relevant consultation questions as follows:

Q1: What conclusions, if any, do you draw in respect of the three short-listed options?

1. CPRE Sussex strongly objects to the Commission's short-listing of a second runway at Gatwick Airport, and considers that any proposal for an additional runway at Gatwick Airport is unacceptable.
2. As we have consistently argued, there is no airport capacity crisis in the UK and therefore no need for a second runway at Gatwick. The UK has more take-off and landing slots than it requires, and this is expected to remain the case until well into the future. Spare capacity exists at London Stansted, Birmingham and Manchester airports, more than sufficient to meet the country's needs.¹
3. We also question the Commission's conclusion that there are no "feasible or effective" methods to redistribute traffic around the UK's existing infrastructure. One potential solution to achieve this would be to introduce differential air passenger duty (APD) across UK airports, to reduce the dominance of London airports and increase the viability of existing capacity outside the South East of England. As the UK moves to devolved setting of APD, this option is becoming increasingly feasible.

¹ The sifting report undertaken for the Airports Commission interim report (December 2013) notes that Stansted is expected to have unutilised capacity until 2040.

4. Correspondingly, an additional runway at Gatwick would be in the wrong place to benefit most of the UK and to rebalance growth away from the South East. Providing a new runway in the South East would make it harder for airports in the Midlands and the North to support new routes operating from their existing runways. As noted by the Commission, “its southerly location would see relatively long journey times by road access from areas north of London.”²
5. We also highlight that the Channel Tunnel is running well below capacity, with proposals to upgrade the Ashford to Hastings rail line improving access to the continental high-speed rail network for the southern part of Sussex. There is significant potential for modal shift of journeys of up to 1,000km to high-speed rail, and CPRE calls for modal shift from air to high-speed rail.

Q2: Do you have any suggestions for how the short-listed options could be improved, i.e. their benefits enhanced or negative impacts mitigated? The options and their impacts are summarised in section three.

6. We do not consider that the negative impacts of a second runway at Gatwick could be mitigated.

Q3: Do you have any comments on how the Commission has carried out its appraisal?

7. CPRE Sussex welcomes the methodical, detailed and rational approach adopted by the Commission, and particularly the fact that the Commission has been prepared to challenge a number of the assumptions made by Gatwick Airport Ltd. in their submissions.
8. Given that we are challenging a number of the Commission’s conclusions, we also welcome the fact that the Commission states that its assessments reflect its present judgement based on the information currently available. We comment below on these judgements, and invite the Commission to review them in light of our response in preparation for the Commission’s final report.³

Q4: In your view, are there any relevant factors that have not been fully addressed by the Commission to date?

9. We have highlighted those areas where we have a concern in their relevant section under Q6.

Q5: Do you have any comments on how the Commission has carried out its appraisal of specific topics (as defined by the Commission’s 16 appraisal modules), including methodology and results?

10. We make no comment.

Q6: Do you have any comments on the Commission’s sustainability assessments, including methodology and results?

11. We make the following comments.

² Page 41 of Airports Commission consultation, November 2014.

³ Page 87 of Airports Commission, Gatwick Airport Second Runway: Business Case and Sustainability Assessment.

Local Economy Impacts

Employment

12. At the most fundamental level, CPRE Sussex disputes the Commission's rationale for promoting employment and economic growth in an area and surrounding region that are together experiencing long-term economic overheating. Where the Commission claims that the main impacts of a second runway would be from noise (negative) and increased local employment (positive), leading to a broadly neutral overall impact, we argue that the negative of noise drastically outweighs the doubtful positive of further employment in an area of very low unemployment.
13. The consultation document suggests that a second runway would increase the number of airport jobs in 2050 by between 7,900 and 32,600, depending on scenarios for future growth in world air travel.⁴ We consider these figures to be serious underestimates. The Gatwick Area Conservation Campaign (GACC) estimates that a second runway would create around 60,000 new on-airport, indirect, catalytic and induced jobs in the Gatwick area by 2050.⁵ We consider this estimate to be valid and a far better indication of a second runway's impact.
14. Much has been made of potential for these new jobs to be filled by residents of South London and from the South Coast. However, only a small proportion of the existing labour force comes from those places, and we do not envisage this proportion suddenly increasing. The Commission predicts that the jobs at Gatwick with a second runway would remain mainly low skilled, and presumably low paid, and it is implausible that the high costs of commuting would make such jobs viable for employees from further afield.
15. The areas surrounding Gatwick effectively have full employment, and very unusually, this position has remained constant even through recent recessions/downturns. In particular, the rate of unemployment that the Commission has applied to Crawley is widely disputed, particularly by the local authority itself, which puts it at 5.3% and not 9%.⁶ With such low levels of unemployment, the creation of around 60,000 new jobs would far exceed the available labour, and could only be filled by large-scale inward migration from other parts of the UK or from the EU. Therefore the projected need for a larger workforce to support the expansion proposals must be reliant on a significant increase in the local population through new settlement. This would be unsustainable.

Housing

16. The consequences of this level of job creation and corresponding inward migration would be a massive and unsustainable increase in demand for housing in Sussex.
17. Predictions by Berkeley Hanover Consulting Limited for West Sussex County Council and the Gatwick Diamond business interest group concluded that the new jobs created by a new runway would create a need for between 30,000 and 45,000 new houses - equivalent to a new town the size of Crawley.⁷ That estimate is confirmed by GACC's calculation of around 60,000 new jobs, producing a far more realistic figure than the Airports Commission's figure of 18,400 new houses.
18. CPRE Sussex takes issue with the superficial way in which meeting this level of housing need is dealt with in the consultation document, as demonstrated in the following extract which is not supported by the evidence:

⁴ Page 42 of Airports Commission consultation, November 2014.

⁵ Annex A of "Gatwick Unwrapped", www.gacc.org.uk/resources/Gatwick%20Unwrapped%201.pdf.

⁶ www.crawleynews.co.uk/Council-blasts-report-impact-new-runway/story-25852749-detail/story.html.

⁷ Berkeley Hanover Consulting Limited, presentation February 2013.

“A number of local councils, including both Crawley and Croydon, have identified challenges in meeting existing housing targets and any additional homes required to facilitate expansion at Gatwick would exacerbate this. However, the additional housing required is not of a scale which is likely to significantly increase these pressures, given the potential timescales for delivery and the number of local authorities affected.”⁸

19. The Commission suggests that new housing might be split evenly across 14 local authorities from Croydon to Worthing. This is unrealistic and ignores the fact that every local planning authority around Gatwick is already struggling to identify suitable sites for housing development to provide a five-year housing supply, even before the impacts of any second runway have been taken into account.
20. With Surrey local authorities largely lying within the Green Belt, and Crawley physically having no space left for building, most of the new housing would need to be built in West Sussex, which is already under siege from proposals for new housing development. A second runway would therefore be expected to transform Sussex into a largely urbanised area, at the expense of the beautiful countryside that is currently enjoyed by local residents and those from further afield, particularly the conurbation of Greater London to the north. The Commission should reflect this reality in its assessment.

Surface Access

21. We are concerned that the Airports Commission appears to accept the notion that a few minor road improvements within a mile or so of the airport, combined with current improvements to the M23 and M25, will be sufficient to deal with growth in road traffic caused by a new runway. This may be the result of the surprising decision to address only the extra road traffic caused by air passengers and on-airport staff, omitting from the assessment the road traffic due to catalytic and induced employment, and also that the assessment is based on forecast road traffic in 2030, when the new runway would be operating at well under its full capacity
22. Given the existing major problems with road congestion in the area, we contend that the proposed improvements will be insufficient.⁹ Local taxpayers will subsequently be alarmed at the prospect of their local highway authority being burdened with the cost of road improvement schemes necessary to alleviate excessive congestion on local A and B roads, which would also cause damage to historic town and village centres.
23. Sussex could expect a significant increase in HGV traffic as a result of the scale of growth at the airport and from associated business growth, undermining rural character, tranquillity and health. Such increases in congestion also result in a considerable dis-benefit to the economy. This calls into question the Commission’s conclusion that the economic impacts of the transport components of the second runway will be neutral.¹⁰
24. We are also concerned that the resultant increase in road traffic, in particular, will have a seriously deleterious effect on the quality of life for residents across Sussex. Road congestion is already a major problem across our area, and road traffic noise and pollution would undoubtedly increase significantly as a result of a second runway.
25. We are confused by the Commission’s simultaneous acceptance that “road access to the north would remain a weakness” and its assertion that Gatwick expansion would contribute to the economic development of the Wandle Valley corridor.¹¹ This is highly questionable.

⁸ Page 24 of Airports Commission, Gatwick Airport Second Runway: Business Case and Sustainability Assessment.

⁹ The Airports Commission itself writes in its November 2014 consultation document that, “A range of investments in the local road network would be needed to enable the delivery of the second runway and associated infrastructure”, although it appears not to look at this in any further detail.

¹⁰ Page 47 of Airports Commission Consultation, November 2014.

¹¹ Page 41 of Airports Commission Consultation, November 2014.

Noise

26. Gatwick is situated in proximity to areas of high environmental sensitivity and quality of landscape, including those with national designations such as the South Downs National Park, the High Weald Area of Outstanding Natural Beauty (AONB), numerous Sites of Special Scientific Interest, and those with European designations, including Special Protection Areas (SPAs) and Special Areas of Conservation (SACs). Particular consideration needs to be given to their role in providing essential amenity, in particular tranquillity, not least to the millions of people who visit these places annually.
27. Tranquillity is a highly valued characteristic of the English countryside and one of the most important indicators of its quality - indeed the Airports Commission itself has recognised tranquillity as a resource associated with well-being and quality of life.¹²
28. We applaud the Commission for acknowledging the reality that “the noise generated by airports has the potential to have significant effects of peoples health and well-being.”¹³ The consultation document also accepts 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.”¹⁴ This is of critical importance to the Commission’s assessment, and we urge the Commission to assess fully the impacts that a second runway at Gatwick would have on the numerous sensitive environments around the airport, some of which are 30 km or further from it and are already considered to suffer from intrusive aircraft noise.
29. The increased air traffic associated with a second runway at Gatwick would be highly damaging to a large number of such places that are prized for their tranquillity. This is supported by general acceptance that in tranquil rural areas (which have lower levels of background noise) aviation noise is much more pronounced, and assessment of the impacts of noise should account for the relative tranquillity of the environment, the ratio of intruding aircraft noise to the natural background noise level of the area, and the actual height of overflying aircraft above the underlying terrain,¹⁵ as opposed to a simplistic measure of absolute noise levels.
30. We are concerned that the current sustainability assessment does not properly assess the impact of a second runway on these tranquil areas.

Air Quality

31. As recognised by the Commission’s assessment, local air quality would be affected by an increase in aircraft movements at Gatwick. Similarly, airport-related transport emissions are shown to result in significant increases in emissions of NO_x,¹⁶ which would undoubtedly be worsened by additional traffic resulting from new housing and commercial development stemming from a new runway.
32. While we support the Commission’s decision to model a larger surface access assessment area than the scheme promoter, resulting in substantially more emissions in the final total, we bring to the Commission’s attention the close proximity of Gatwick to an area of particularly high environmental sensitivity - the internationally protected Ashdown Forest. We are greatly concerned at the potential for a second runway to damage this important habitat, which is an SPA and SAC designated under the EU Habitats Directive. The sensitive plant and animal species found in the

¹² Airports Commission Appraisal Framework:

www.gov.uk/government/uploads/system/uploads/attachment_data/file/300223/airports-commission-appraisal-framework.pdf

¹³ Page 32 of Airports Commission consultation, November 2014.

¹⁴ Page 45 of Airports Commission consultation, November 2014.

¹⁵ Note that the terrain around Gatwick includes topography reaching over 800 feet above mean sea level.

¹⁶ Page 115 of Airports Commission, Gatwick Airport Second Runway: Business Case and Sustainability Assessment, “...modelling would also suggest that expansion without mitigation would increase airport related transport emissions of NO_x by 32% in 2030 and by 78% in 2050.”

forest are already at risk from road-vehicle pollution and the negative impacts of visitor pressure from new housing development.

33. We are alarmed that the Biodiversity Assessment appears to underestimate the undoubted threat that a second runway would pose to the Ashdown Forest. It is already established that there would be the risk of substantial damage due to increasing numbers of vehicles crossing the forest (nitrogen deposition) and from visitors (from new households moving into the area as a result of Gatwick expansion) using it for recreational purposes.¹⁷
34. CPRE Sussex calls for an urgent reassessment of these air pollution risks. We would have expected the Commission already to have stipulated the need for an Appropriate Assessment in respect of the Ashdown Forest under the Habitats Directive, before shortlisting Gatwick expansion.¹⁸

Biodiversity

35. We urge the Commission to give greater weight to the value of natural habitats and biodiversity that surround Gatwick and which would be lost forever should a second runway be built. We assert that the biodiversity assessment is too limited in the geographical area and development impacts that it assesses.
36. It should address an area far wider than the immediate environs of the airport and should include the impacts on biodiversity of development indirectly caused by a second runway (e.g. new housing, new business premises). We call for such assessment to measure the impact of a second runway on all land with special landscape value up to 30 km from Gatwick, both with respect to designated land (AONBs, national parks, registered parks and gardens, green belt and metropolitan open land)¹⁹ and other undesignated land (including fields, field margins, woodland, hedgerows, gardens, allotments and parks),²⁰ all of which also contribute to biodiversity.
37. CPRE Sussex also calls for the Commission to properly reflect the biodiversity value of ancient woodland in its assessment. In contrast to the Commission's assertion that it has "low replaceability", ancient woodland is by definition irreplaceable. We therefore question the validity of "biodiversity offsetting" for loss of ancient woodland, despite its ongoing endorsement by Whitehall.
38. Sussex is fortunate to have an important network of ancient woodlands. However, not only would 14 hectares of it be directly destroyed by the second runway, but also an additional undetermined acreage would be in grave danger of being lost forever to urban development in support of the expanded runway. Further loss and permanent fragmentation of precious habitats like these would have far wider implications for the area's natural environment.
39. The limited way in which the loss of biodiversity has been assessed by the Commission is reflected in the excessively low estimates of the cost for providing compensatory mitigation for direct habitat loss (estimated to be between £4.8 million and £9.1 million). We also question whether the calculation of total present value of lost ecosystem services (estimated to be between £6 million

¹⁷ Evidence demonstrating the negative impact of development on Ashdown Forest required that the recently adopted Wealden Local Plan be based on a housing target significantly below that set in the South East Plan.

¹⁸ We note the very substantial weight that the Airports Commission interim report placed on compliance with the EU Habitats Directive. Page 10 of the current Biodiversity Assessment states: "Increased traffic levels within the SAC are predicted, partly as a result of the scheme proposal, which in turn are likely to increase levels of nitrogen deposition onto the sensitive habitat features of the SAC...a reassessment of the potential biodiversity impacts should be undertaken."

¹⁹ Including those covered by (a) European Legislation: SACs, SPAs, Ramsar sites, European Protected Species, sites identified as essential for compensatory measures to mitigate adverse effects on SACs, SPAs and listed Ramsar sites; (b) National Legislation: National Nature Reserves; Sites of Special Scientific Interest; Ancient Woodlands; Marine Conservation Zones; species protected under the Wildlife and Countryside Act; and priority habitat and sites holding priority species; and (c) Regional and Local Legislation or Action Plans: Local Wildlife Sites; Local Nature Reserves; and habitats and species listed in the Red Data Book.

²⁰ Fields (arable and pasture), woodland (including designated ancient woodland) and hedgerows provide important habitats for diverse flora and fauna, including protected species, and should therefore be included in the impact assessment.

and £9 million over the course of the 60 year assessment period) reflects too low a value being placed on the essential functions they provide.²¹

Place

40. This assessment criterion aims to ensure that impacts on existing landscape character and heritage assets are minimised, and to identify and mitigate any other significant environmental impacts. As acknowledged by Gatwick Airport Ltd. itself, a second runway would require a dramatic increase in support and ancillary services in the vicinity of the airport, including long-term parking, overnight accommodation and airline support activities. These would be expected to spill out into the surrounding areas, creating pressure for commercial and industrial development in important gaps between local settlements.
41. We particularly bring to the Commission's attention to the strength of local feeling towards the need to keep towns and villages (e.g. Crawley, Copthorne, Crawley Down and East Grinstead) as discrete settlements, and the value placed on such endangered "critical gaps".
42. Furthermore, we are concerned at the quality of development associated with airport support activity, which is typically wasteful of land (e.g. long-term car parking), of poor visual quality (e.g. warehousing) and supportive of lower value employment.

Quality of Life

43. The stated objective of this criterion is to ensure that the second runway "maintains and where possible improves the quality of life for local residents and the wider population." CPRE Sussex asserts that a second runway at Gatwick would undoubtedly cause a significant, permanent and unacceptable reduction in the quality of life of those living within a wide radius of the airport.

Q7: Do you have any comments on the Commission's business cases, including methodology and results?

We have no comment.

Q8: Do you have any other comments?

We have none.

In conclusion, CPRE Sussex encourages the Airports Commission to "grasp the nettle" and fully recognise the significant negative environmental and quality of life impacts that a second runway at Gatwick would bring. Many of these impacts are alluded to and indeed recognised in certain places among the Commission's reports, but then seemingly downplayed in the overall consultation document. This is regrettable but thankfully rectifiable, and we encourage the Commission to rectify it in the next iteration of its work.

Yours faithfully,



Justin French-Brooks
Trustee
on behalf of CPRE Sussex

²¹ Page 40 of Airports Commission: Gatwick Airport Second Runway: Business Case and Sustainability Assessment.