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Gatwick Airport Consultative Committee

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Dear Sir/Madam,

Consultation on Draft Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England

I refer to the above consultation which was considered by GATCOM (Gatwick Airport Consultative Committee) at its meeting on 27 April when the Committee agreed its consultation response.

GATCOM is the statutory advisory body for Gatwick Airport constituted under the provisions of the Civil Aviation Act 1982. GATCOM brings together a broad and varied range of interests from the local community and environmental groups to the aviation industry, passengers and business interests. There are, as you can imagine, differing views amongst our membership about the need to provide additional runway capacity and whether there should be an additional runway at Gatwick. However, the Committee has reached a common view which is set out in the Committee's response to the consultation questions appended to this letter.

I trust our views will be taken into account.

Yours faithfully,

A handwritten signature in blue ink that reads "Paula Street".

Paula Street
Assistant Secretary

BY EMAIL
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DRAFT AIRPORTS NATIONAL POLICY STATEMENT: NEW RUNWAY CAPACITY AND INFRASTRUCTURE AT AIRPORTS IN THE SOUTH EAST OF ENGLAND

GATCOM'S RESPONSE TO THE DFT CONSULTATION QUESTIONS

The need for additional airport capacity

Question 1:

The Government believes there is the need for additional airport capacity in the South East of England by 2030. Please tell us your views.

GATCOM is not able to reach a consensus on whether or not there should be an additional runway at Gatwick due to the diverse and conflicting views of its membership. However, there are a number of areas/issues where the Committee has reached a common view and those views are covered in the responses to the consultation questions below as appropriate.

The Government's preferred scheme: Heathrow Northwest Runway

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.

No comment.

Assessment principles

Question 3:

The Secretary of State will use a range of assessment principles when considering any application for a Northwest Runway at Heathrow Airport. Please tell us your views.

No comment.

Impacts and requirements

Question 4:

The Government has set out its approach to surface access for a Heathrow Northwest Runway scheme. Please tell us your views.

The importance of having high quality, efficient and reliable road and rail access to airports has been outlined in the consultation document together with the recognition that airport expansion will affect the local and national transport networks which operate in and around the airport. It is pleasing to note that the consultation document places an expectation on Heathrow Airport Limited to work closely with the transport providers and other stakeholders to consider the planning, development and timing of any necessary improvements. The programming and timing of motorway works is a key concern to GATCOM.

It is hoped that in planning the works necessary to the motorway network to support the Heathrow scheme all parties also give consideration to the programme of other works being undertaken on the motorway and rail networks in the region so as not to have a detrimental impact on the movement of goods around the south east region and specifically on the surface

access routes serving Gatwick. The M25/M23 is the main motorway link to Gatwick Airport and as such consideration must be given to the impact of the works associated with the Heathrow scheme on Gatwick's operation and access routes for passengers and airport staff. GATCOM is particularly keen to ensure that the major motorway works on the M25 are co-ordinated so that they are not undertaken at the same time as the proposed Dartford Crossing works or the other smart motorway works on the M23 or at the same time as the major rail infrastructure schemes planned on the Brighton Main Line. GATCOM therefore highlights the need for Heathrow Airport Limited, working with Highways England and Network Rail, to consider any potential impacts on the surface access routes to Gatwick as part of the planning and programming stage of the Heathrow scheme.

It is also vital to ensure that funding streams already identified for surface access projects in the Gatwick region are protected and not diverted to those schemes needed to support Heathrow's expansion. The Airports Commission recommended a package of measures to support Gatwick's growth and operation in the short to medium term, such as improvements to the Gatwick Station, improvements to the Brighton Main Line, M23 and the M25. In addition to this, there are major infrastructure improvement schemes identified by Network Rail for the Brighton Main Line to address capacity and congestion on this busy railway line. It is important that the Government continues to commit funding streams for these projects and to safeguard those funds from being diverted to schemes to support Heathrow's expansion project.

Question 5:

The draft Airports National Policy Statement sets out a package of supporting measures to mitigate negative impacts of a Heathrow Northwest Runway scheme. Please tell us your views. Are there any other supporting measures that should be set out? In particular, please tell us your views on:

- **Air quality supporting measures**
- **Noise supporting measures**
- **Carbon emissions supporting measures**
- **Compensation for local communities**

GATCOM wishes to comment on three aspects – Airspace design, carbon emissions and the ban on night flights.

Airspace Design - It is acknowledged that changes will be made to the airspace around London and the south east to accommodate the new runway at Heathrow and that this will undoubtedly result in changes to Gatwick's current flight paths. In redesigning the airspace, GATCOM hopes that the opportunity is taken to re-examine the current situation where Heathrow's traffic restricts the altitude of Gatwick's traffic to ensure that flights into and out of Gatwick can be accommodated at higher levels than is currently the case.

It is noted that the Government expects Heathrow Airport Limited to consult in the near future on a set of "principles" on airspace changes which its airspace designers will then use as a basis for their work in developing proposals for consultation through the airspace change process. GATCOM acknowledges that designing airspace proposals is a challenging task which needs to be addressed in a balanced but sensitive manner. It is important that as part of that work that the views are also sought from key stakeholders and interest groups around Gatwick on the principles given the implications of any changes on the use of Gatwick's airspace and to help identify the key priorities for Gatwick and its communities in seeking continuous improvement to Gatwick's noise climate.

GATCOM therefore requests that a requirement is placed on Heathrow Airport Limited to proactively engage with Gatwick Airport Limited, GATCOM and other interested parties on the formulation of the design principles and the further work on the redesign of airspace.

It is also hoped that the DfT's new stakeholder engagement group, ANEG, which provides a forum through which issues about the use of airspace and noise policy development can be

discussed with a range of stakeholders, is given the opportunity to consider Heathrow's design principles together with ways in which the current situation of Heathrow's traffic restricting the height of Gatwick's traffic can be resolved.

Night Flights - GATCOM notes that the Government has as a condition of the Heathrow scheme proposed a ban on all scheduled night flights at Heathrow following the opening of a third runway. This will undoubtedly have implications for the London airports system as a whole and airlines' current business models. Whilst GATCOM supports measures to mitigate the disturbance by communities around Heathrow, the Committee is concerned to ensure that such a ban will not have a negative impact for communities around Gatwick as there could be greater pressure on Gatwick to provide more night slots. GATCOM therefore requests that the Government ensures that the Committee is given the opportunity to input to the development of proposals to address the night flight ban at Heathrow at an early stage as it is vital that the implications of imposing such a ban are fully assessed and will not result in an increase in demand for night flights at Gatwick.

Carbon – GATCOM is concerned that the expansion of Heathrow would take the lion's share of the UK's carbon target. It is estimated that the Heathrow scheme will use c.60% of the Committee on Climate Change's 2050 UK aviation carbon target. It is disappointing that no indication has been given as to how this will be addressed and managed to ensure that other UK airports can continue to compete for growth within the constraints of the UK's target. It is important therefore that the Government clearly sets out its expectations for the UK airports market as a whole in a way that does not restrict competition between and growth at other airports.

Question 6:

The Government has set out a number of planning requirements that a Heathrow Northwest Runway scheme must meet in order to operate. Please tell us your views. Are there any other requirements the Government should set out?

See the responses to Questions 4 and 5 above.

Draft Airports NPS Appraisal of Sustainability

Question 7:

The Appraisal of Sustainability sets out the Government's assessment of the Heathrow Northwest Runway scheme, and considers alternatives. Please tell us your views.

Throughout the Government's review of providing new airport capacity GATCOM has raised the need for the Airports Commission as well as the Government to consider the economic, social and environmental impacts for Gatwick as a result of the airport expansion taking place elsewhere in the South East. In his recent response to GATCOM dated 7 March 2017, the Minister highlighted that the Appraisal of Sustainability examines the likely social, economic and environmental impacts which could arise as a result of the Government's preferred option.

Having considered the content of the Appraisal of Sustainability GATCOM remains concerned that the implications for Gatwick and the Gatwick region have not been fully assessed. It is noted that paragraph 6.5.12 states that "As well as employment displacement impacts, increase in activity at one of the two airports to be expanded could reduce activity by a similar magnitude at another airport (an example would be reduced activity at one of the UK's regional airports, such as Birmingham Airport). These impacts will also need to be taken into account". In addition to this paragraph 7.4.16 in the summary of significant effects: Preferred scheme (Wider Economic impacts) states "Expansion at one airport may, however, have an adverse impact on the level of activity at another airport. Evidence of this impact is shown in the AC's work on smaller airport passenger numbers in passenger forecasts for Birmingham Airport, for example, are lower under each airport expansion scenario. Taking the NWR scheme, passenger numbers at Birmingham are forecast to be over 5.3 million passengers fewer in 2050 than forecasts in the 'Base Case' ". There is no specific mention of the impacts of the Heathrow

scheme on the future growth or operation of Gatwick or the Gatwick region and this issue needs to be addressed.

GATCOM therefore reiterates its previous concerns that it is important that the potential impacts, both during construction of the new Heathrow runway and after it is opened, are taken fully into account and where possible addressed and mitigated.

General questions

Question 8:

Do you have any additional comments on the draft Airports National Policy Statement or other supporting documents?

As currently drafted the draft Airports NPS is reliant on a single option, the Heathrow North West Scheme, and offers no clarity on wider airport growth for either the South East region or the UK as a whole. GATCOM views this as a missed opportunity and is concerned that the NPS does not recognise or reflect on the need for, or the benefits of, competition in the airports market or how growth at other airports in the South East or elsewhere in the UK which help to build resilience in the system will be supported.

Whilst it is noted that the Government intends to begin the process of developing a new strategy for UK aviation and will consult on various aspects of the proposed policy framework over the coming months, GATCOM is concerned about the further delay in not having a comprehensive NPS which addresses the growth at other airports. In the absence of any other current national planning policy framework for aviation, it is difficult to see how the NPS as drafted will provide the Secretary of State with a sufficient basis for judging applications for increasing capacity and other airport infrastructure across all UK airports, particularly given the fact that Chapters 4 and 5 of the draft NPS relate to expansion at Heathrow only. There is a vital need for the UK to have a robust planning policy for the future to ensure a competitive and resilient UK airports market.

Question 9:

The Government has a public sector equality duty to ensure protected groups have the opportunity to respond to consultations. Please tell us your views on how this consultation has achieved this.

No comment.