

RUSPER PARISH COUNCIL

Consultation Response to Gatwick Airport's Proposal to Develop its Emergency Runway into its Northern Runway pursuant to a Development Consent Order.

November 2021

This is the submission by Rusper Parish Council in response to Gatwick Airport's consultation on the Northern Runway proposal as part of its application for a Development Consent Order (DCO). The consultation documents are unclear as to whether this submission will simply be considered internally prior to such application or whether this (and other) consultation submissions will be provided to Planning Inspectorate which will be considering Gatwick's application. For the avoidance of doubt, it is requested that this submission be provided to the Planning Inspectorate.

Gatwick Airport is of the opinion that its present single runway operation will be inadequate to meet its traffic requirements in the latter part of this decade and beyond. Accordingly, it is planning to increase the present runway capacity by about 12% which it claims it is entitled to do under existing Government policy but, in addition, it is requesting consent to rebuild the existing emergency runway, currently used mainly as a taxiway, into a fully operational second runway.

They state that this proposed second runway will only be used to relieve pressures and avoid the delays to short-haul aircraft (only) taking-off when there is a conflict in aircraft arriving. The 'Northern Runway' will not be used for landings (except in emergencies) or for larger long-haul aircraft. These restrictions are in fact mainly for safety reasons.

The consequences of both the increase in existing runway capacity and the development of a second 'take-off only' runway will cause a material increase in noise and pollution – particularly as 70% of Gatwick's movements take-off and fly at low level directly over Rusper Parish.

While this is a pre-application response to Gatwick Airport prior to their making an application for a Development Consent Order, we would equally wish the Planning Inspectorate to give due consideration to the matters raised in this response which are focussed on two separate aspects arising from Gatwick's proposals.

1. Is there actually a demonstrable and provable need for increased capacity at Gatwick Airport?
2. The adverse impact on the local communities from the Proposals, if agreed.

1. Is it needed?

The annual number of aircraft movements at Gatwick only increased from 259,000 to 283,000 in the 13 years from 2007 to 2019. Gatwick are now forecasting that without a second runway, the number of movements will increase to 318,000 by 2038 and to 382,000 movements with the second runway. No evidence has been seen as to whether this will require additional disturbing night flights.

Such exponential growth does not appear to be supported by any recent independent economic assessments of traffic growth and would therefore appear to be simply a mathematical calculation of how many movements Gatwick would be able to cope with if they have the increased runway capacity.

The combination of the pandemic and 'climate change' is, however, leading to a fundamental re-focus in the future use of air travel and strongly suggests that any such calculated demand is likely to be seriously flawed.

It is well-known that low-cost tourist travel, on which Gatwick relies, is kept low-cost because of its significant cross-subsidy from premium rate business travel. The pandemic has resulted in the vast majority of businesses whose management and senior staff were frequent flyers – particularly to Europe, North America and the Far East – recognising that by conducting many of their previous face to face meetings with the likes of Zoom, they would be making substantial cost savings. Hence such reduction in business travel will lead to the cross-subsidy substantially diminishing. This, in turn will push up the existing low-cost fares and thus, in turn, inevitably reduce demand.

Equally, this ignores the impact of above-inflation increases in the cost of aviation fuel and other costs, let alone the inevitability of increased taxation (where there are inexorable pressures to remove the present beneficial tax treatments). The days of cheap flying will be over.

Further, the increasing focus on climate change, not only among the younger population but increasingly among those used to taking family holidays on the low-cost carriers, will permanently influence and change people's habits away from air travel.

It is therefore much more likely that the perceived demand for ever-increasing air travel will, certainly by the end of this decade (which is of course the earliest time when the Northern Runway could come into service), be seen to have stabilised, and quite probably reversed.

It is notable that there is nothing in Gatwick's proposals in considering the prospects of a lowering demand in air travel – the focus is entirely on exponential growth in runway capacity and the assumption that the need will be there.

Little has also been said in Gatwick's proposals about the consequences of any reduction in night-time movements, about which there is a current DfT consultation. There is a general consensus that this should result in a significant reduction in the present night quota limits. The overwhelming majority of night-time movements at Gatwick are currently flown by EasyJet (c.90%) and they state that this is considered commercially essential in order to maximise aircraft utilisation and hence keep fares lower than would otherwise be the case. The consequence of any reduction in night-time flying will thus lead to higher fares and thus further reduce demand.

And, finally, there is no mention of the potential impact on Gatwick if Heathrow's Third Runway is built. While there may be uncertainty, if it were to be completed, a substantial amount of the present Gatwick traffic would undoubtedly move to Heathrow. Even EasyJet, which presently makes up two-thirds of Gatwick's traffic, has publicly stated a desire to operate out of Heathrow – principally to take advantage of Heathrow being a 'hub' airport, whilst Gatwick is simply a point to point one.

Hence, it is submitted that there must be serious doubts as to whether there will be sufficient traffic in the 2030s and beyond to demonstrate that Gatwick actually needs the Northern Runway.

2. The Impact on the Community

There is increasing evidence that both noise and pollution from aircraft have a material impact on the health of those communities that are over-flown. While aircraft are now somewhat quieter than those of several decades ago, there is no likelihood that noise levels can now be further reduced to any material degree. Suggestions of the development of quiet electric aero engines powering the type of airliners operating at Gatwick is simply beyond implausible.

The concept of flights increasing by one-third – which is what Gatwick envisages – will therefore have a major impact on otherwise quiet and peaceful local communities such as Rusper which is immediately under the flight path to the airport runway.

But this is only part of the adverse impact – and perhaps of even greater concern is the impact on the need for ever more housing and commercial developments and related infrastructure envisaged by Gatwick in its expansion. Their paper suggests an additional 18,000 to 20,000 jobs will be directly created as a consequence of the growth. In pre-pandemic days, there was effectively zero unemployment in the local area and thus new jobs will require more people to move into the area from elsewhere in the country.

These individuals and their families will need additional housing requirements and will significantly add to road traffic congestion and all the related issues which go with such population growth. Importantly much of the forecast additional employment will be for relatively low paid service providers and given the high cost of new houses in the south-east, their housing needs cannot be met by new housing developments, even if such were to be permitted.

Just recently, Natural England have drawn attention to the local authorities that this part of England already has insufficient water resources to support new housing estates. Additionally, one other major local developer has recently requested a major reduction in the Government's requirements for new houses to be fitted with charging units for motor vehicles on the simple grounds that they forecast there are insufficient power supplies available to meet such needs.

Essentially, these quite recent concerns about local resources are highlighting the increasing and very real doubts about the sustainability of population growth, particularly in the South East. Gatwick's growth plans will give rise to an unnecessary major impact on sustainability within the local community.

3. Other considerations.

The present Government's strategy is for major infrastructure projects to be focussed on the more deprived areas of the United Kingdom. While there is no direct Government investment in this project, if permitted, it will encourage more economic activity into the South East, which is contrary to Government policy.

And, again, while the funding for the project is said to be coming from Gatwick's investors, it must be noted that, as a consequence of the pandemic, Gatwick Airport the company is not only currently trading at very significant day to day losses but is already insolvent on a balance sheet basis – being financially supported solely by increased borrowings.

The controlling investor, Vinci, while identified in Gatwick's proposals as "a leading private airport operator" is actually a French construction business. The other shareholder is Global Infrastructure Partners, a New York-based investment fund. Having only bought their stakes in 2019, at which stage Gatwick had a materially different financial position and prospect, these owners' long-term plans and considerations must inevitably be uncertain.

It is understood that neither investor has yet committed to funding the substantial costs envisaged directly and indirectly in Gatwick Airport's plans.

Cllr Malcolm Fillmore
For and on behalf of Rusper Parish Council
30 November 2021