

Betchworth Parish Council

GATWICK AIRPORT “Relevant representation”

Introduction

Betchworth Parish, home to almost 900 residents, is a rural parish situated 7 miles north of Gatwick airport. Betchworth derives very little economic or social benefit from the proximity to Gatwick airport but is blighted by Gatwick road traffic speeding through rural lanes and by constant noise from aircraft departing on Routes 3 and 4. In addition Heathrow aircraft also fly over the parish.

Approval of the airport’s proposals would cause very significant environmental harms and generate very limited net benefits. Gatwick should not be permitted to grow or expand unless and until it is able to demonstrate that it could do so whilst at the same time reducing, in a proportionate and balanced way, all adverse environmental, noise and other impacts of any growth.

Betchworth Parish Council is a member of GACC and the Vice Chair is a GACC committee member. We have drawn on GACC technical expertise for some elements of our representation.

Road traffic

Our Parish lies between the airport and the M25 and increased road traffic and congestion, traffic noise and air pollution will be a major problem. A high volume of traffic exits from the M25 and takes a short cut through the rural roads to the north of Gatwick rather than joining the very often congested M23. Pebble Hill Road (B2032) and the Street in Betchworth are unsuitable even for the current volume of Gatwick traffic. These roads were not designed for this volume of traffic and are continually in need of repair. This level of traffic on rural roads brings noise disturbance particularly at anti-social times, safety concerns, air pollution, carbon emission increase and roadside littering.

Nothing material is proposed in the application to fundamentally change the existing poor road and rail connectivity. The effect on local infrastructure and our community of any increase in traffic would be wholly unacceptable.

Noise Envelope

Gatwick has not met the ANPS requirement that noise envelopes are “defined in consultation with local communities”, nor CAA guidance that noise envelopes are agreed with stakeholders. Gatwick: rejected community stakeholder requests to change the format and timetable for engagement to improve compliance; failed to provide additional data and analysis for effective engagement; and its proposals were not agreed as they excluded almost all stakeholder comments. Gatwick’s draft Noise Envelope Group Output Report fails to reflect community group views on Gatwick’s proposals or its engagement process.

Gatwick’s proposals do not:

- Meet government policy (APF 2013) that “Future growth in aviation should ensure that benefits are shared between the aviation industry and local communities [so] continue to reduce and mitigate noise as airport capacity grows.” Instead, the proposals would permit noise to increase substantially and potentially indefinitely, so benefits of growth accrue almost entirely to Gatwick and its customers.
- Give communities certainty about future noise levels (APF para.3.29), contain any proposals to limit noise in the winter period, and allow future reviews to increase noise limits.
- Incentivise airlines to introduce the quietest suitable aircraft as quickly as is reasonable.

Gatwick should be required to engage properly with community groups and councils, under

agreed independent chairmanship, to develop new proposals that comply with policy and guidance.

Noise.

The proposal would create an unacceptable increase in noise over a very wide area around LGW outside of the area covered by the Noise Envelope, much of which is rural and contains large Areas of Outstanding Natural Beauty. The proposal makes no plans to mitigate this huge environmental impact on a very large population.

Departure Routes 3 and 4, one of which is always in use, affect the residents of Betchworth who therefore have no respite at all from aircraft noise. Route 4 is Gatwick's busiest departure route. An increasing number of Heathrow flights also route over Betchworth. A 35% increase in Gatwick aircraft numbers would be devastating for the residents this rural area.

The ANPS states that the Government expects a ban on scheduled night flights for a period of six and a half hours, between the hours of 11pm and 7am, to be implemented and that the rules around its operation, including the exact timings of such a ban, should be defined in consultation with local communities and relevant stakeholders. In addition, outside the hours of a ban, it states that the Government expects the applicant to make particular efforts to incentivise the use of the quietest aircraft at night.

The government has been clear that the ANPS is an important and relevant consideration in respect of applications for any airport nationally significant infrastructure project in the South East of England, not just Heathrow, and that its policies will be important and relevant for the examination by the Examining Authority, and decisions by the Secretary of State, in relation to such applications.

Gatwick has not proposed a ban on night flights or offered any other limitation on night flights. It has also not explained what particular efforts it would make to incentivise the use of the quietest aircraft at night outside the hours of a ban.

Needs Case.

In our view there is no need for additional capacity at Gatwick, which serves a predominately leisure market. The current airport capacity more than satisfies current demand. This expansion will encourage airlines to stimulate greater demand through pricing and to attract additional customers away from the UK regional airports. London Heathrow will have more than enough capacity to satisfy any increase in the business travel and cargo markets. This application is all about increasing the size of the GAL business and not at all about satisfying a realistic market demand.

Gatwick has not put forward a credible needs case for the proposed development. Its traffic forecasts do not in our view constitute a reasonable basis for assessing the need for additional capacity and its overall case does not comply with the Airports National Policy Statement (ANPS) which requires airports (other than Heathrow) that are seeking to expand to demonstrate sufficient need for their proposals, additional to (or different from) the need which would be met by the provision of a Northwest Runway at Heathrow.

Climate change and emissions

Expansion of Gatwick would have very substantial climate change impacts. Gatwick's proposals would increase the airport's CO2 emissions by almost 50%. If it were permitted to

expand as proposed, Gatwick alone would be responsible for *over 3 - 5% of the UK's sixth carbon budget, with or without Jet Zero mitigations. Approval would require government to ignore the Climate Change Committee's 2023 Progress Review recommendation to not permit any airport expansion without a UK-wide capacity-management framework being in place.* An increase in emissions of this (or any) magnitude would be inconsistent with Government policy and would clearly have a material impact on the UK's ability to meet its carbon reduction targets. It would be wholly unacceptable to allow CO2 increases and other climate and community impacts on this scale to facilitate any increase in air travel but most particularly to facilitate an increase in the leisure travel market that Gatwick primarily serves, predominantly for the benefit of a minority of the population. The Committee on Climate Change has advised that there is no need for additional airport capacity in the UK and that any net expansion would have unacceptable climate change impacts. The application addresses only the emissions caused by operations within the airport. It totally ignores the vast increase in emissions which will be caused by the additional aircraft utilising the airport.

Flood Risk

Over the years the River Mole has caused flooding in Betchworth, and many other towns and villages further downstream, on many occasions, especially when Gatwick discharges water in extreme events. Climate change is making these extreme events more frequent and severe. This application deals with flood risk on the airport and immediate vicinity in great detail but does not do so for the effects downstream. A full review of the effects on the full length of the River Mole should be required and mitigations put in place.

Gatwick should also not be allowed to understate the climate impact on flooding by selecting a short (40-year) runway design life. The full flood risk must be modelled, and mitigated. The impact of empirical data on how climate change is already increasing the frequency and severity of flooding must be fully assessed.

Economic

Gatwick's assessment of the economic benefits and costs of the proposed project is based on unsupported or out-of-date assumptions, together with omissions and errors. Correction of these assumptions, omissions and errors would have a very significant effect on the overall benefit-cost of the proposed scheme. It is likely that the scheme in fact has a negative net present value and therefore represents a highly unattractive proposition from a public interest perspective. The leisure travel market does not make a positive contribution to the UK economy. The outbound market, adding income to overseas economies outweighs the inbound market by a very substantial margin.

Employment

Gatwick's presentation of the asserted employment benefits of the proposed development is misleading: the project is not expected to result in material net job creation at the national level. Any local or regional job creation would be by displacement from other regions and therefore likely to be inconsistent with the government's levelling up agenda. Over the past 20 years as Gatwick passenger numbers have grown airport employment numbers have actually decreased.

If the expansion is allowed conditions such as listed below should be put in place.

- Ban on night flights.
- Incentivising airlines to use the quietest aircraft.
- Payments to local councils for roads and other infrastructure costs occasioned by the airport expansion.
- Releasing the land outside of the current airport boundary currently held to build a second main runway.
- No further expansion of the airport boundary.
- No landings to be allowed routinely on the northern runway.
- Dispersal of flight paths.