



HOUSE OF COMMONS

LONDON SW1A 0AA

10 January 2019

Stewart Wingate  
Chief Executive, Gatwick Airport Limited  
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Gatwick Airport  
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Dear Stewart,

Please accept this letter as my response to the Gatwick Airport Draft Master Plan 2018 consultation. As you know from our discussions, both about this document and wider issues, the success and continued growth of Gatwick Airport is not something I oppose. Indeed, it is encouraging to see a business wish to grow. However, there are significant noise impacts which planes arriving at Gatwick Airport have on Tonbridge, Edenbridge and surrounding villages and this remains a considerable concern for many residents in Kent. While the airport has taken some measures to address these concerns, and for a few progress is welcome, my response to the draft master plan will primarily look at the noise impact the proposals would have on Kent, although there are other concerns I want to raise.

I have decided to respond by letter, rather than by answering the suggested questions in your response form, as many posed do not concern me as the representative of Tonbridge and Malling.

In addition to noise impacts which I will address shortly, a major concern for residents in Kent is the lack of transport infrastructure. Despite having to bear the noise impact of the majority of arriving flights over the county, just 7.4% of passengers at Gatwick Airport are from Kent. This is most likely due to the poor road and rail links, with the only major road to the airport from the county being the M25, which primarily serves traffic coming from North and Mid-Kent.


The only realistic infrastructure improvement which could be delivered as part of this proposal would be the improvement of services on the Tonbridge-Redhill train line. These services are run by GTR, who also serve the majority of trains to Gatwick Airport and the immediate locality. In the last decade GTR has overseen a gradual and managed decline of both the frequency and quality of services operating between Tonbridge and Edenbridge and the Brighton Mainline. The direct service to Gatwick Airport from Tonbridge ended over 10 years ago, and the direct service to London Victoria ended in May 2018. Subsequently, the line has been left as an unreliable shuttle between Tonbridge and Redhill, with services frequently cancelled as trains are sacrificed for other services, and GTR's incompetency means there are often not enough drivers available to run the trains they schedule, and on some occasions failing to book in the scheduled train services themselves. None of this appears to have been taken into consideration in your plan.

With passenger numbers to the airport expected to grow by 15 million a year, according to the master plan document, Kent is an area which could benefit from a direct and reliable train service to help get millions more passengers to and from the airport. However, without

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significant investment in the Tonbridge-Redhill line this growth won't be achieved. Until Gatwick Airport comes to an agreement with GTR and the Department for Transport to run direct services between Tonbridge, Edenbridge and Gatwick Airport to enable passengers from south west Kent, the ones most affected by the noise impacts of growth, to reach the airport in a much timelier manner, I am unable to support the master plan.

As I have said before, noise is the biggest impact Gatwick has on communities in Kent. Residents of Tonbridge, Edenbridge and surrounding villages are all blighted by the impact of noise, particularly in the summer when there are more air traffic movements (ATMs). This is a fundamental issue and one which must be addressed before any further growth takes place. Over the past few years numerous protest groups have formed to tackle excessive aircraft noise in West Kent, a direct result of the 17% increase in flights arriving at Gatwick Airport since 2010.

The Government policy, reinforced in the Aviation Policy Framework, the latest and most up to date defined aviation noise policy, is "to limit, and where possible, reduce the number of people significantly affected by aircraft noise". It goes on to state that the benefits of growth should be shared equally with measures to reduce noise. It is therefore concerning that as Gatwick has benefitted since 2010 by an increase in ATMs of 17%, the 57db noise contour, the Government's preferred method for measuring noise, has increased 8.5% by area and 40% by population. This demonstrates, clearly, that the benefits of growth in ATMs have certainly not resulted in a reduction in noise for communities affected by it. This must be addressed.

The growth levels previously mentioned included in the master plan make it extremely disappointing that there is little detail about the measures which Gatwick Airport will be taking to ensure that the aims of the Aviation Policy Framework are followed, and ensure that unlike the period 2010-2018, noise is reduced as the airport grows. Without firm detail about how this will be achieved, it will be impossible for any noise impacted community, or representative, to support these plans as they demonstrate that the master plan proposals will have an adverse effect on those communities which suffer from noise.

Furthermore, the wider picture when looking at impact of the 57db noise contour only explains part of the issue. The noise footprint planes leave, which has suffered from significant increases since 2010, does not take into account the concentration of flights. Groups such as Gatwick Obviously Not, and all other groups represented on the Noise Management Board, have been arguing for a long time for fair and equitable dispersal of flights to ensure that one community is no worse or better off than any other. There is widely-noted recognition from local communities that frequency is a crucial aspect of noise perception, but this does not appear to have been taken into consideration. In fact, Gatwick's own study, completed by the University of Sussex, looks at this and I am disappointed this does not feature in its analysis of the master plan proposals.

The view of these communities is supported by the Civil Aviation Authority. It too recognises that frequency is crucial in measuring noise, not just average noise levels as per the master plan. Increased frequency is caused by greater concentration and the lack of detail about how the additional ATMs will approach the Airport leads to the impression that there will be greater concentration, somewhere, as a result. This is contrary to the views expressed by all communities consistently, and the efforts community groups have made to achieve this.



There is a practical impact of this, which too seems not to have been recognised so far in the master plan. The use of the Instrument Landing System (ILS) to route aircraft in means a degree of concentration as aircraft look to land safely. However, NATS are unable to bring aircraft closer in until there is a break in arrivals. On busy summer days at the moment, this does not happen. The result is that those communities, such as Tonbridge and Leigh, which sit towards the eastern, furthest edge of the ILS suffer from the greatest amount of concentration on the busiest days. As more ATMs are introduced to the arrival pattern, I am concerned that this will see greater concentration within the swathe on the furthest edge.

This concern is exacerbated by the planned introduction of Precision Navigation Technology (PR-Nav) in the coming years. This relies on an even greater use of concentration as a means of vectoring aircraft to land safely and, coupled with the increased ATMs, will almost certainly result in greater concentration for certain communities.

So it should come as no surprise that I would urge Gatwick Airport to drop the proposals in its master plan. The proposals would increase the noise impact over West Kent and the area wouldn't feel the economic benefits that Gatwick say its plans would bring. On a national level, the Davies Commission report of 2015 did not recommend introducing a second runway at Gatwick - the result of this long, costly, and the detailed report should be respected.

Irrespective of what anyone may call the use of the standby runway, it would be used as a second runway at the Airport and should be treated as such. It is for this reason that it is crucial that Gatwick Airport treats it as such, being that it delivers the benefits which it sees of a second runway without having to construct one to the south of the main runway. It is also one of the reasons why Gatwick's promised infrastructure fund of £46.5m should be used if this project proceeds for wider transport and mitigation measures. Some of the projects which I have highlighted at the start of this letter are good uses of this money and I would encourage Gatwick to look at this anyway, irrespective of whether it proceeds with using a second runway.

Finally, I am struck by paragraph 4.4.30 of the consultation document. This contains a commitment that Gatwick will work with neighbouring highway authorities in West Sussex and Surrey on highway issues. It neglects to mention Kent. This demonstrates that the plans as proposed would have a negative impact on Kent. We would see the noise impacts without the economic benefits. It is for this reason that I cannot support the proposals in the master plan.

*Best wishes,*

*Tom Tugendhat*

**TOM TUGENDHAT**