

TOM TUGENDHAT MBE MP



HOUSE OF COMMONS

26 November 2021

LONDON SW1A 0AA

Stewart Wingate
Chief Executive, Gatwick Airport
5th Floor, Destinations Place
Gatwick Airport
West Sussex
RH6 0NP

Dear Stewart,

Please find below my responses to the Gatwick Airport consultation on bringing into regular use the standby runway.

As will be no surprise to you, I am strongly opposed to this proposal. You are aware of the longstanding concerns I have regarding the impact of operations from Gatwick Airport on residents across West Kent. There is no information contained within this document which gives me any reassurance that a proposal to expand Gatwick Airport, increase the number of flights overhead and grow the number of passengers at the Airport will bring any significant advantages to our area.

My concerns have long been based around aircraft noise, and despite there being the potential for a small improvement in per flight noise as fleets are updated, this will happen whether Gatwick expands or not. Indeed any improvement will not be audible for arrivals and as I explain later, the proposed noise envelope is inconsistent with Government policy to reduce the number of people significantly affected by aircraft noise.

Consequently Tonbridge, Edenbridge and surrounding villages will get all of the environmental impact and none of the very limited economic gain from the expansion of jobs at Gatwick. There isn't a single promise to directly fund much needed major infrastructure within West Kent, including the essential return of direct rail services between Tonbridge, Leigh, Penshurst and Edenbridge with Gatwick Airport.

Please find my answers to the consultation questions as follows:

1 To what extent do you support or oppose our proposals to bring the existing Northern Runway into routine use?

I strongly oppose Gatwick Airport's proposals, for the reasons articulated in this letter.

2 Do you think we could do anything more - or differently - to maximise local and regional employment and skills benefits?

Given that Oxera, consultants to Gatwick Airport, make quite clear that they do not see this expansion resulting in the net creation of jobs at a national level, there is clearly much more

Member of Parliament for Tonbridge and Malling

130 Vale Road, Tonbridge, Kent TN9 1SP

01732 441 563 - tom.tugendhat.mp@parliament.uk - www.tomtugendhat.org.uk



that Gatwick Airport needs to do to demonstrate that this proposal would result in the significantly larger economic benefit to communities which would override the tremendous environmental damage of its proposals on the local area.

Oxera have made clear that there is no evidence of a casual link between air travel growth and employment growth, that the studies associated with it do not adequately reflect more recent emerging evidence of the saturation of developed country transport markets either.

Given the aviation industry's drive towards automation, which is likely to accelerate as a result of the pandemic, the long term 'job intensity' of aviation is likely to continue falling, as it has been for a decade. This is not referenced in Gatwick's employment assertions.

3 Do you think we could do anything more - or differently - to maximise benefits to business and the economy?

It is not clear from any of the documentation within the consultation how West Kent will benefit from expansion at Gatwick Airport. It starts from the basis that the Covid19 pandemic will have no impact on long-term passenger demand, which is not one I share. Specifically, the growth in electronic communications, especially for business use, will continue to reduce the need for travel in coming years.

As a result of this assumption Gatwick has assumed that the airport's total proportion of business passengers will remain at around 13% and there will be an absolute increase in business passenger numbers of around 1.5million from 2032. For the same reasons I dispute this figure. This is particularly important given that business travel benefits make up between 65% and 75% of the proposed total user benefits.

7 Do you think we could do things better, or differently, to ensure all passengers and staff have appropriate choices for accessing the airport?

It is essential that access to Gatwick from West Kent is given a far greater priority, irrespective of whether the proposal is agreed or not. There are currently insufficient transport options, especially by public transport. Given that the consultation says that 42% of passengers access by rail, it is essential that further priority is given to increasing this figure given the economic growth options Gatwick can participate in from West Kent.

It is concerning that focus is given to increasing highway capacity in the vicinity of the airport ahead of investment in rail and public transport, specifically reintroducing the direct rail connection with Tonbridge, via Edenbridge, Penshurst and Hever.

The proposals by Gatwick mean that it would miss its commitment to achieve 60% sustainable transport by 2030, and further focus on public transport links from West Kent would go some way towards resolving this.



There is also insufficient evidence contained within the consultation documents that Gatwick has taken account of the likely increase in road traffic in Kent, Surrey and Sussex caused by new developments forthcoming.

9 What are your views on how our proposals for increasing use of public and sustainable transport apply in your area? Please specify the proposals to which your comments refer and tell us if there are other things we could do that would be relevant to your journeys.

There is no doubt that Gatwick's proposals are nowhere near what is required to ensure that West Kent can benefit from any expansion. There is great mention of the excellent rail connections in the consultation document, but in reality this is only through the London Victoria to Brighton railway. There is no mention of the Tonbridge-Redhill line being improved which is unacceptable given this is the most direct link from Kent to Gatwick.

12 Do you have any comments on our approach or suggestions for specific measures to be incorporated into the Action Plan?

Expansion at Gatwick Airport would increase CO2 emissions attributable to the Airport by nearly 50%. However, proposals to reduce carbon emissions from air travel do not exist at the moment, as it recognised across the industry. The Transport Decarbonisation Plan commits to achieving net zero aviation by 2050, however its 'Jet Zero' initiatives are not yet deliverable, especially around electric, hydrogen and hybrid aircraft.

Emissions attributable to Gatwick would grow from less than 1% of the total UK emissions in 2018 to over 5.5% of the Climate Change Committee's recommended total UK emissions in 2038. This is clearly incompatible with the aspirations that Government has and provided compelling reasons why the expansion proposals should not go ahead.

13 Do you think the proposed noise envelope is:

Appropriate, Inappropriate, Don't know

Please explain your views

There is no doubt that the proposed noise envelope is inappropriate. The claim that there would be less impact from aircraft noise following expansion than experienced in 2019 isn't correct, and relies on actions beyond the ability of Gatwick Airport to deliver.

In relation to metrics, the envelope should be extended to align fully with the 51dB noise contour. Unless this happens the benefits of noise insulation promised will not be extended to everyone within the defined noise contour. An acceptable noise contour must include a



number of measures including average noise contours at different dB levels, noise event frequency at different dB levels and overflight. This is confirmed by the Civil Aviation Authority in its CAP 1129 paper.

Government policy clearly requires the industry to reduce and mitigate noise as airport capacity grows. Therefore it is incompatible with Government policy to have a proposal which has the average noise contour in the day period – even under Gatwick's metrics – increase, as is proposed by Gatwick Airport. This would be significantly greater than noise levels in 2019. Government policy also requires that the benefits of growth be shared equally between industry and communities, however there is no evidence that the latter benefits much from this expansion, particularly in West Kent.

14 What are your views on our approach to noise mitigation? Please specify the measures to which your comments refer

The absence of any areas east of Hever in the noise contour is an error for the reasons stated above. I am also concerned that there is no mitigation proposed beyond Leq 8hr night 55dB and Leq 16hr 54db noise contours. This will result in a worsening of aircraft noise for residents and businesses across Tonbridge, Edenbridge and the surrounding villages.

Best wishes,

Tom Tugendhat

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