

Representations on: **Gatwick Airport Northern Runway
Pre- Examination Consultation 2023**

On behalf of: **The Nevill Family**

Date: **27th October 2023**

Introduction and Overview:

The following submissions are made on behalf of the Nevill family in respect of the Gatwick Airport Northern Runway proposals by Gatwick Airport Limited (GAL). They are submitted to the Planning Inspectorate - the Examining Authority in this matter.

As longstanding residents and custodians of large scale land holdings and property south of Tunbridge Wells within the High Weald Area of Outstanding Natural Beauty (AONB) the family has a keen interest in the proposals which would result in a step-change in airport operations and associated over flying of their landholdings and environs, much of which is highly sensitive in landscape terms and carries the very highest ecological and biodiversity value. The landscape and ecology have evolved over many centuries and is recognised through a variety of designations including Area of Outstanding Natural Beauty (AONB), Special Area of Conservation (SAC), Sites of Special Scientific Interest (SSSI) and Sites of Nature Conservation Interest (SNCI).

The family is very concerned regarding the environmental impacts and noise pollution leading to harm and damage to the many sensitive habitats. The need to balance responsible economic growth with environmental effects is recognised but there is real concern that the Northern Runway proposals will have serious and grave impacts on interests of acknowledged importance. With that in mind, it is quite clear that the Airport could seek to evolve in a more responsible way by making best use of existing spare capacity and advancing technology. At the national level, there is also a case for re-visiting the longer-term strategy for air travel to ensure that future provision for the UK is not unduly dominated by two airports within the South-East. As it stands, the Civil Aviation Authority published passenger numbers for the busiest 10 UK airports show that in 2022, London airports handled 131 million passengers, whereas those outside London handled 63.2 million passengers, therefore some 67.5% of air passengers using the 10 busiest UK airports passed through London. Making air travel even more London - South East centric would reinforce and increase the disparities in economic performance between different regions and would do little to benefit the wider needs of the country as a whole and the long-held aspiration of 'levelling up'.

This is despite there being significant excess capacity at other significant regional airports in the UK, notably, at Birmingham where its runway operates at about one third of its operational capacity and, with suitable upgrades to the terminal building and supporting facilities could handle well in excess of 30



million passengers a year rather than the 18 million currently forecast by 2033 (source: birminghamairport.co.uk). This would tie in perfectly with the delivery of the High Speed 2 rail link to Birmingham which will greatly reduce journey times from London and is currently forecast to complete between 2029 and 2033, with the airport being served from the new Birmingham Interchange railway station via a 1.4 mile link, with new elevated automated people mover. Employing a ‘joined up’ approach would best serve the national interest by beginning to redress existing economic and infrastructure imbalances between regions.

Submissions:

Sustainable growth

The Gatwick Airport Limited (GAL) Planning Statement states the proposals would enable the airport operations to expand to a cap of 386,000 air traffic movements (ATM’s) by 2047. This is a 36 per cent increase compared with the 2019 figure, immediately prior to the pandemic, whereas CAA data for 2022 shows Gatwick passenger numbers for that year were down by some 30 per cent compared with 2019 – the biggest fall of any of the busiest 10 UK airports (Heathrow and Stansted for example being at 76% and 83% of 2019 levels, respectively). The PS refers to Department for Transport statements in general terms (without specific citation) stating that Heathrow and Gatwick are already ‘full’. However, it is not clear whether these forecasts date from pre-Covid 19 pandemic and, therefore, are outdated. This Statement, suggesting a lack of general capacity is clearly incorrect since 2.5.5 of the Planning Statement states ‘even without the Northern Runway Project Gatwick will continue to experience Growth in passengers and air traffic movements’. In this baseline scenario the Statement confirms that the airport would be able to handle 326,000 commercial air traffic movements in 2047 reflecting an increase of about 10% compared with 2019 throughput.

It would seem to us, even without scrutiny of the 10% figure to see if this genuinely represents the upper limit of baseline (i.e without northern runway) growth, that even a 10% growth in the scale of London Gatwick Airport operations is a significant quantum.

The unbridled growth that would arise from the addition of a second operational runway would represent a ‘predict and provide’ approach purely focused on possible future demand and without in our view appropriate regard to broader environmental constraints. Moreover, this single minded commercially driven approach is completely at odds with wider Government commitments on measures to combat climate change – including the legal responsibility to reach net zero by 2050.

In view of this, the robustness of the case for the proposed additional runway falls into question. In this vein, we seriously question whether the scenario of making best use of the existing runway has been fully tested, and whether the 10% figure referred to above is sufficiently ambitious and has appropriate regard to likely improvements in technology: particularly given the extended period until 2047 and the rapid and increasing pace of technological change.

Environmental effects upon northern East Sussex / West Kent borders and Ashdown Forest SPA/SAC

Significant areas of the family’s landholding lie adjacent to the Ashdown Forest Special Protection Area and Special Area of Conservation – two of the very highest environmental protection policies which reflect the international significance of the Forest and its wider setting in the High Weald AONB. Large parts of the Ashdown Forest (some 2,729 hectares) are designated as a Special Area of Conservation (SAC). The SAC status was awarded because Ashdown Forest contains one of the largest single continuous blocks of



lowland heath in south-east England. The SAC designation recognises the special nature of the vegetation found within Ashdown Forest, namely European dry heaths and North Atlantic wet heath and affords it legal protection by the Conservation of Habitats and Species Regulations 2017 (as amended) which transposes the requirements of the European Habitats Directive (92/43/EEC).

The main threat to the SAC relates to air pollution and this has been a key factor in development decisions in the wider region for some time.

Some 3,205 hectares of the Forest are awarded the SPA status - for a number of qualifying individual species that includes the Dartford Warbler and nightjar that the SPA supports during their breeding season.

These areas are therefore highly sensitive to change in air quality and pollution, and noise pollution, the combination of which will rise considerably through the airport expansion proposals.

Gatwick Airport Limited's own literature ("Gatwick Airport – Aviation Noise Information") states that around 70% of aircraft operations are in a westerly direction, owing to the need to land and take off into the prevailing wind. Additionally, the document states "aircraft arriving at Gatwick Airport will mostly be joining the Instrument Landing System (ILS) from the south due to airspace restrictions caused by the proximity of Air Traffic associated with Heathrow Airport to the north, and other airspace restrictions" (p.14).

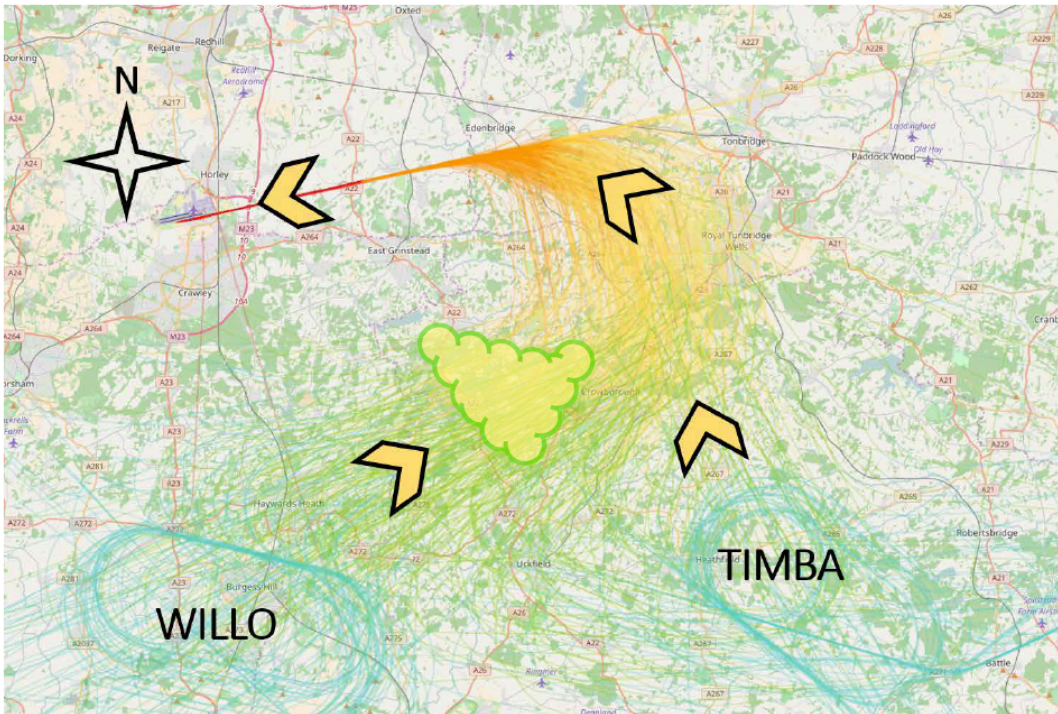
Additionally, the document states "unlike departing aircraft that have set routes to follow during the initial stages of flight, there are no such defined routes leading to the final approach for inbound aircraft neither are there any noise limits or fixed heights". Furthermore, "there are no financial sanctions against airlines that fly off track as there are many factors including wind, speed, weight and temperature that can affect the performance of an aircraft".

Given the constraints, and established bias of landing aircraft approaching from the south and east of the airport, it is understandably of significant concern that the areas within and surrounding the Ashdown Forest within the East Sussex / Kent borders will experience significant increases in overflying as an inevitable consequence of the planned increase in aircraft movements. As stated in the applicant's own literature these are unfettered with little or no environmental controls over operation and virtually no sanctions. This is entirely unacceptable and will undoubtedly lead to environmental harm and impact on those living within or near the flight paths. Furthermore, the lack of effective environmental controls over aircraft prior to final approach casts doubt on whether it is possible to accurately assess and predict the 'real world' impacts of the proposed significant increases in aircraft traffic.

The visual below is from the Gatwick Airport "Aviation Noise Information" publication, and shows the typical flight patterns of a day of aircraft arrivals. To this, we have added, schematically, the outer extent of the Ashdown Forest areas by the simple light green 'bubble'. Whilst approximate it does demonstrate the significant number of aircraft passing over the Forest, and indeed large parts of the Nevill Estate, which extends beyond the SPA boundary, north-eastwards towards Tunbridge Wells.



A typical day of arrivals, on westerly operations



We note that East Sussex County Council in their representations dated 24th October 2023 have made the point that the various reports prepared by Gatwick Airport Limited suggest properties in areas with flight paths exceeding 7000 ft. would not be affected. However, the typical elevation of the Ashdown Forest is 700ft., and Crowborough is about 800ft above sea level, therefore reducing the ‘net’ aircraft flying level. Using digital plane tracking data, it is clear that many of the planes are flying well below an altitude of 5,000 feet in these areas. We are therefore concerned to ensure all of these environmental factors have been appropriately included within the Environmental Assessment, in relation to impacts upon Air Quality, Noise, and indeed health.

The County Council has asked for clarification regarding what the applicant considered to be ‘minor adverse significant effects’ on the Ashdown Forest. We would support this request, as it clearly ties into concerns as to whether the effects have been fully and robustly considered, having regard to the sensitivities of these areas.

If, notwithstanding these significant concerns, the runway proposals do proceed, it is imperative that night flights at the Airport do not increase and that the northern runway is not used for any additional night flights.

Concluding remarks:

In closing, we are concerned that the areas in and around Ashdown Forest and the wider East Sussex / West Kent (Tunbridge Wells) borders, all within the High Weald AONB, will suffer significant adverse environmental effects in the context of a sensitive and predominantly rural area that is a nationally protected landscape and of the very highest ecological importance and significance.

Furthermore, the Airport is forecast (based on its own published information), even without the additional runway, to achieve double digit aircraft movement growth over the next 25 years. There is scope for



achieving efficient growth by looking at ways of moderating the peaks and troughs of demand - for example, by staggering school holiday periods, and through maximising operational efficiency and use of future technology. Additionally, in our view, the proposals reinforce a continued London / South-East centric approach, that would miss the opportunity to act in the best interests of the country as a whole, by failing to make best use of significant spare runway capacity at airports such as Birmingham, which within the next decade will be linked in to the new High Speed rail link (HS2).

Virtually unfettered growth at Gatwick to the tune of 36 per cent in the next 25 years is completely at odds with the Government's legal commitments on net-zero and climate change. For this reason we object in the strongest possible terms to the Northern Runway proposals at a strategic level, as well as with regard the specific impacts on the local areas including SPA/SAC's, SSSI's and SNCI's.

