

Gatwick Second Runway – East Sussex View

1. What is the background?

The Airports Commission published its Interim Report into airport capacity in December 2013. Its view was that there needed to be an additional runway in the south east by 2030. There is likely to be demand for a second additional runway by 2050.

The Commission shortlisted proposals for a further detailed study; two were for a new runway at Heathrow and a third was for a new runway at Gatwick.

The Airports Commission consulted on these three options from November 2014 to February 2015. It will formulate its recommendations, submitting their final report to Government in Summer 2015 for them to make a decision on their preferred option. It is expected that an additional runway could be in place as early as 2025.

2. What is the Gatwick option?

Gatwick Airport consulted on three different ideas for a second runway in April and May 2014. The outcome of this was published in July 2014 at:

<http://www.gatwickairport.com/business-community/New-runway/Second-runway-consultation/>

From the consultation the preferred option for Gatwick Airport is an 'independent mixed mode'. This means there would be a new runway 1,045m south of the existing runway, with a new terminal built between the two.

A summary of Gatwick Airport's submission to the Airports Commission is now available at:

http://www.gatwickobviously.com/sites/default/files/downloads/connecting_britain_to_the_future_faster.pdf

A second runway at Gatwick will be cheaper to build, would have less impact on the environment, and from the Airports Commission's own figures would have minimal impact on the public purse compared to the Heathrow options.

3. What is the Airport Commission's assessment of the three options?

From the Airports Commission's own assessment of all three options – the two at Heathrow and one at Gatwick, whilst the Heathrow options may generate more in terms of jobs and overall economic benefits to UK plc compared to Gatwick, the

Heathrow options would have a greater overall impact on the environment, they would be more expensive to deliver, and the delivery timescales would be longer than providing a second runway at Gatwick.

The surface access catchment analysis undertaken by the Airports Commission's consultants primarily focuses on public transport journey times. Whilst their assessment identifies that slightly more people overall will be able to access Heathrow rather than Gatwick in a journey time up to three hours, Gatwick is more accessible than Heathrow for those travelling up to 90 minutes – the majority of East Sussex will be within 90 minutes by rail of an expanded Gatwick, whereas rail travel times to an expanded Heathrow would be 2 hours or more from most parts of the county.

Therefore an expanded Gatwick Airport with the identified surface access infrastructure improvements – which the Airports Commission's own assessment identified were appropriate and will meet the demands placed upon them – will be easier to access from all parts of the county than Heathrow.

4. Why were options for an additional runway at some of the regional airports and Stansted discounted by the Airports Commission?

Options for an additional runway were proposed for a number of the regional airports including at Birmingham and Stansted in response to the Airport Commission's Interim Report in 2013.

However, in the sifting of options put forward, the Birmingham proposal was rejected on the basis that it was a 'significant distance from the key catchment area of London', whilst the Stansted options were rejected as they were likely to provide very little extra capacity with the effect on Luton Airport and the consequential need to close Heathrow for 'airspace and commercial issues'.

5. What is the County Council's View?

The County Council supports a second runway at Gatwick Airport and agree with the 'independent mixed mode' runway option that has been put forward by the Airport.

The Council believes this option supports the delivery of the Council's key priority of long term economic growth for East Sussex. It maximises economic benefits and the capacity and operational efficiency of the Airport. A second runway will be significantly important for businesses in the county by:

- Providing better access to international trade and global markets, and

- Encouraging inward investment and supporting the vitality of our local economy; generating much needed jobs both on and off the airport for our residents over the next 20 – 30 years.

Our support for a potential second runway remains on the basis that the Airport will honour the various pledges in their mitigation and compensation package including:

- £46.5m to help local authorities deliver essential community infrastructure;
- A £3.75m fund to help create 2,500 new apprenticeships for local people;
- A series of noise initiatives including £45m for Gatwick's unique council tax initiative and £5m for noise insulation measures;
- With Network Rail and the Highways Agency, improvements to strategic transport links
- A commitment of £10m to a local highway development fund to mitigate local traffic impacts arising from the expansion of the Airport

Further information on Gatwick Airport's series of pledges equating to over £250m in their 'Connecting Britain to the Future' document is available at the following link : <http://content.zone-secure.net/connectingbritaintothefuture/>

6. How was the County Council's decision to support a second runway made?

At the Full Council meeting on 27 January 2015 all Councillors were invited to represent their views on the proposed second runway and recent flight path changes at Gatwick Airport. An open vote took place which saw a majority of Councillors supporting the proposal subject to certain conditions being met. A subsequent Cabinet meeting formally approved this decision. The papers for these meetings can be found at:

<http://www.eastsussex.gov.uk/yourcouncil/about/committees/meetingpapers/countycouncil/2015/27january.htm>

<http://www.eastsussex.gov.uk/yourcouncil/about/committees/meetingpapers/cabinet/2015/27january.htm>

In making these decisions we have weighed up the evidence that has been presented in relation to the economic benefits to the county in terms of jobs and supporting our businesses, the environmental impacts as well as considering other issues such as surface access infrastructure. Whilst recognising that with an expanded Gatwick there will be noise and environmental impacts on some of our communities, the Council considers that the economic benefits for East Sussex do outweigh these impacts.

7. How will transport access be improved to Gatwick Airport if a second runway comes forward?

One of our caveats for supporting a second runway is that there are improvements to the surface access infrastructure by road and rail to the airport.

Rail

The surface access strategy identifies a package of rail infrastructure and service improvements, including the Thameslink programme, Crossrail, and improvements to the Brighton Main Line. Their delivery will play a significant role in improving direct access by rail to the Airport from the coastal strip of East Sussex and, with one interchange, access from other parts of the country including the population north of London as well as capacity to accommodate the additional demand to travel by rail to the Airport. These improvements are within Network Rail's funding programme and will come forward regardless of any potential second runway at Gatwick.

Road

The Highways Agency is putting forward a package of improvements to provide extra capacity on the M23 and M25 to reduce congestion and improve accessibility to the airport. Again these schemes are already programmed to come forward regardless of any potential second runway at Gatwick. The Airport is also proposing the need for improvements to the M23 Junction 9 and the local road network as part of their runway proposals.

Other surface access issues

Whilst the above road and rail improvements are welcomed, the County Council felt that east-west access to the airport had not been adequately covered in the surface access strategy and the Council has met with Gatwick Airport to discuss our concerns. In response Gatwick have highlighted a number of ideas to help support car access to the airport for East Sussex residents where travelling by rail or bus/coach is not an option. These are:

- One hour free parking for pick-up's at the long stay car parks, and
- A local highway improvement fund to deal with airport traffic on local roads. We will continue to discuss the access issue with Gatwick Airport, to ensure the strategy continues to meet the needs of East Sussex business and residents.

8. What is the impact of a second Gatwick Airport runway on housing and infrastructure?

We recognise that a potential second runway at Gatwick may result in additional County Council infrastructure requirements over a 25 - 30 year period to accommodate any additional housing and employment space in East Sussex resultant from the Airport's expansion.

The Airport Commission's consultation has identified that between 13,500 and 18,400 additional households over the assessment area of 14 districts (including Wealden,

Eastbourne and Lewes) may be required to accommodate additional/all employees. They have also identified that the expanded Airport could create up to 63,000 new jobs.

In terms of new homes, the Commission asserts that there could be between zero and 18,400 homes required; this housing would be provided in a phased manner and across the entire assessment area; and the demands on any individual local authority is likely to be 'relatively small'. The Commission believes that the reason for this is that a lot of new workers would commute from existing areas, including from East Sussex.

Accordingly, our consultation response to the Airports Commission considers the likely housing and infrastructure implications from an East Sussex perspective.

We would expect the Airport to honour its pledge of a £5,000 contribution per new home related to the Airport expansion to help fund local infrastructure improvements required to support these houses, as well as its £10m pledge to address airport related congestion issues on the local highway network.

We would also be looking to Central Government - with the Local Enterprise Partnership's support - to help fund strategic transport infrastructure improvements; particularly to the A27 and rail, which may be required to support additional housing in our Borough and Districts.

9. Will a second runway affect air pollution and Ashdown Forest?

Data from the Department for Food and Rural Affairs (Defra) indicates that, on average, aircraft emissions contribute to approximately 0.5% of total ambient NO_x concentrations in the Ashdown Forest SAC/SPA.

The Airport Commission's assessment study concludes that no locations in the Gatwick study area are predicted to exceed Nitrogen Oxides (NO_x) air quality objectives or EU limits, with the exception of one site in Crawley. Therefore, any expansion to Gatwick Airport is unlikely to have a significant impact on the nitrogen deposition issues on Ashdown Forest which are predominantly associated with motorised vehicle emissions, whereas both Heathrow options, according to the Commission's own assessment, will find meeting the EU limits extremely challenging.

10. There was flooding at Gatwick Airport in December 2013? How will this be addressed if there is a second runway?

In relation to the flooding issues at the Airport last Christmas, a review was undertaken and a resulting report made a series of recommendations with an action plan being put in place in order that such events do not arise again.

As part of their second runway submission, and on top of the flood mitigation actions identified, Gatwick are proposing to divert the River Mole south of the airport boundary which, taking account of the additional surface water run off from an expanded airport, has been assessed to flood risk.

Flight Path Trials

11. Local residents are reporting substantial changes to flight patterns with many more flights appearing to travel over the Crowborough / Heathfield area in the last few months. Why is this?

We were advised by Gatwick Airport following local residents' concern over apparent changes to flight paths into Gatwick that there had been no changes to the arrivals routings at the airport. We were told that Gatwick and its airlines had been operating to their summer schedule, which naturally brings more flights and this increase in traffic, coinciding with this summer being the busiest that the airport has seen.

However, we have recently been advised that there had actually been changes to flights during the summer as a result of the Civil Aviation Authority (CAA) and NATS trying out new vectoring choices for arrivals to see what effect they would have. These new vectoring choices focussed on a tactical point of between 10 and 12 nautical miles from the runway as opposed to previously aiming to establish aircraft on the final approach into Gatwick somewhere between 7 and 12 nautical miles.

This, coupled with the busy summer flights, has resulted in aircraft being more noticeable, affecting East Sussex residents far more than has previously been the case.

We have written to the Secretary of State expressing our disappointment and concern about only being told after the event has taken place and this is not acceptable. In addition to this, we have highlighted our concerns over potential future noise disturbance, our desire to see flight paths shared on an equitable basis, and that night flights should be restricted to 'shoulder' periods at the very start and end of the night time period. A copy of this letter can be found at:

<http://www.eastsussex.gov.uk/NR/rdonlyres/6EC1864A-CEE3-4AA6-A993-0098B88B6443/0/LetterfromESCCtotheSecretaryofStateforTransportDecember2014.pdf>

Robert Goodwill MP, the Minister responsible for Aviation, has informed us that arriving aircraft into the UK do not have set flight paths and are not subject to noise limits or height restrictions, but departing flights are. The introduction of performance based navigation (PBN) arrival routes will be mandatory by 2019 and it will bring potential benefits in providing a more efficient airspace system. Government has stressed to the airports the importance of engaging effectively with its local communities to protect and enhance the use of respite as a means of mitigating impact of aircraft noise.

Unfortunately this 'trial' did not require a consultation, nor can the County Council or

any other body influence any changes to these flight paths, as apparently these are within the CAA's existing parameters for flight paths.

Should a second runway come forward at Gatwick, there would need to be further changes to departure and arrival flight paths into the airport and these will need to be consulted upon at the appropriate time.

12. Can you provide further clarity on the 25% reduction in spacing variation in respect of the revised vectoring practices?

Since trying out the revised vectoring practices (i.e. a 25% reduction in spacing variation), the air traffic controllers are now more consistently able to sequence aircraft on final approach at the minimum separation distance. In doing this they have achieved a 25% reduction in the amount of variation, but not a reduction in the utilisation of airspace.

Note: 'aircraft vectoring' is when aircraft are navigated by air traffic control, in order to maintain a specified distance and to guide arriving aircraft to land in a safe and efficient manner.

13. I have heard about trials being undertaken on departures from Gatwick. Have there been any trials in relation to arrival routing or procedures?

Gatwick were trialling a change to the departure route for aircraft taking off to the west – known as the ADNID trial.

We were advised by Gatwick Airport that there had been no trials in relation to arrival routing or procedures for aircraft landing from the east. However, we have recently been advised that that the Civil Aviation Authority and NATS were trialling new vectoring choices for arrivals (see 11. above).

Future Flight Path Changes

14. I understand Gatwick consulted on potential flight path changes? What is this about?

The 'London Airspace Change- Gatwick Local Area Consultation' was published in May 2014 and relates to reviewing and making changes to the use of existing airspace around Gatwick in order to enhance safety and improve efficiency. The consultation ended in mid-August 2014.

The proposals were intended to be in line with a European Directive which aims to improve efficiency and simplify airspace management and UK Government policy to

reduce the number of people affected by flight paths through concentration, rather than dispersal.

The consultation document is available at:

<http://www.gatwickairport.com/gatwickairspaceconsultation/>

In our response on London's Airspace Change consultation in August 2014 we highlighted our concern with the introduction of Performance Based Navigation (PBN) as this will ultimately result in communities potentially experiencing continual noise disturbance from aircraft flying overhead thereby affecting their ongoing health and wellbeing. The Airport Policy Framework (APF) states that the PBN should be introduced 'in most circumstances'. This does not mean it has to apply in all circumstances, and given the rural nature of the area around Gatwick, in particular proximity of the High Weald Area of Outstanding Natural Beauty to the airport, in this particular case this should not apply.

We suggested that flight paths needs to be shared on a more equitable basis with the development of multiple routes which provides predictable rotating respite across the arrival swathes over East Sussex into Gatwick Airport. This can be delivered using the PBN technology, and this approach would seek balance with the management of airspace against the health and wellbeing of residents who would be potentially affected. In addition, we also advocated, using the available technology to minimise noise impacts, that arrivals are kept as high as possible for as long as possible before descending on the approach to the airport.

(Note: aims to improve the operation and efficiency of aircraft by concentrating traffic on certain routes, with the aim to improve operational and environmental efficiency).

15. Are there any other details on the point merge that is to be introduced?

There is limited detail on where the potential point merge would be, other than it is likely to be south of Gatwick Airport, with the arc likely to start over the sea and that the point merge will be over land.

16. Are these proposals linked to the Airports Commission's review of additional runway capacity in the south east and Gatwick's proposals for a second runway?

No. The focus of the consultation undertaken last summer was to meet short-to-medium term demands by providing an airspace system to help the UK meet the Future Airspace Strategy (FAS) and European requirements, and making best use of the existing runways. Any significant future changes to runway infrastructure will require further changes to the airspace system. The breadth of the required airspace changes will be entirely dependent on whatever option is chosen by the Government.

Any such changes would be the subject of their own change processes and consultation at a later date.

County Council Representations on flight path trials and future flight path changes

17. What has the County Council being doing to represent the views of local residents?

The County Council has received a considerable volume of correspondence from local residents and communities regarding the changes to flight paths over the summer and the proposed changes to flight paths in the future and the effect on East Sussex.

In turn, we have raised with Gatwick the following concerns and issues with Gatwick Airport including within our response to their airspace management consultation:

- Concern that any concentration of routes will result in communities potentially experiencing continual noise disturbance from aircraft flying overhead thereby affecting their ongoing health and wellbeing.
- We would not wish to see a worsening of noise or environmental impacts of aircraft on communities and special / protected areas in East Sussex in respect of any changes to Gatwick flight paths.
- There is a caveat in the Aviation Policy Framework that states “*in most circumstances*” it is desirable to concentrate aircraft along the fewest number of specified routes – we have argued that this does not mean that it has to apply in *all* circumstances and given the rural nature of the area around Gatwick, including East Sussex, flight paths should be shared on a more equitable basis.
- Strongly suggested that rather than concentration Gatwick should consider the development of multiple routes, for use both in the daytime period as well as night-time flights, providing predictable rotating respite across the arrival paths which go over East Sussex into Gatwick Airport.
- We suggested, as did GATCOM, that there should be a full consultation on the detailed flight paths.

We also advocated in our consultation response that the industry should be encouraging aircraft to climb higher more quickly on departure and stay higher for longer on arrival in order to reduce noise impacts.

A copy of our consultation response is available at:

<http://www.eastsussex.gov.uk/roadsandtransport/public/gatwick/default.htm>

In addition, through our representation at Gatwick's Consultative Committee (GATCOM) we requested a special meeting of its Noise and Track Monitoring Action Group (NATMAG) to specifically discuss the concerns of residents across East Sussex, West Sussex, Kent and Surrey regarding the proposals within the London Airspace Management Plan consultation. This meeting of NATMAG was held on 29 August 2014.

We have written directly to the chair of GATCOM and the Chief Executive at Gatwick Airport seeking clarity on the flight path proposals that were being put forward and the potential effects on East Sussex as well as highlighting the views that had been represented to us. As highlighted in 11 above, we have also written to the Secretary of State for Transport on flight path issues in East Sussex.

18. What Happens Next?

Gatwick has reviewed all the feedback arising from the recent airspace consultation and re-visited all of the proposals set out in the previous consultations.

As a result, Gatwick have put on hold any potential changes to local airspace management to enable them to undertake more detailed work to better understand the available options and next steps. We understand that this will include further detailed work on final route options, and will consider the possible merits and options for more respite for residents most affected by noise (including at heights between 4,000 and 7,000 feet as well as up to 4,000 feet).

Although the Civil Aviation Authority's Future Airspace Strategy requires that changes to local airspace are implemented by 2020, we are lobbying Gatwick to ensure they seek to maximise the flexibilities available in the management of the airspace.

NOISE

19. Are there bans on flights operating to and from Gatwick Airport?

There is not and never has been a ban on flights operating to and from Gatwick Airport at any time of the night. However, in order to try to balance the interests of the local communities and those of the airports users, there are restrictions and rules regarding night flights. The Department for Transport (DfT) is responsible for making the restrictions on the types of aircraft that can be scheduled to fly at night. In setting the restrictions the aim has been to maintain a balance between the need to protect local communities from too much aircraft noise at night and the operation of services where they provide economic benefits . Further information is available at:

<https://www.gov.uk/government/publications/night-flying-restrictions-at-heathrow-gatwick-and-stansted-airports>

Unlike departing aircraft that have set routes to follow during the initial stages of flight, there are no such routes leading to final approach for inbound aircraft, and neither are there any noise limits or fixed heights. This is because arrivals come into UK airspace in a random pattern and then have to be sequenced to ensure safe separation.

However, there are various noise abatement procedures in force to minimise the impact of arriving aircraft on both the local and wider community. An Advisory Code of Practice (ACoP) was formulated by a group comprising airlines, Air Traffic Control, the Civil Aviation Authority and Government representatives, to define and incorporate these procedures; the ACoP was originally distributed to airlines operating at Gatwick in 2002 and, following a review, a second edition was published in November 2006.

20. How are noise abatement measures achieved through flying practices?

Subject to safety requirements, one of the main noise abatement measures identified in the ACoP is Continuous Descent Approach (CDA). CDA is a noise abatement technique of flight designed to try and avoid prolonged periods of level flight below 6000ft during which a pilot descends at a rate with the intention of achieving a continuous descent to join the glide path at the correct height for the distance; studies have determined that elements of prolonged level flight are noisier than when following CDA and the aviation industry is working very hard to improve compliance.

This procedure results in keeping the aircraft higher for longer reducing the need for thrust and in addition to aiding noise reduction, this also reduces fuel burn thereby cutting emissions and producing an overall environmental benefit.

A CDA is not a precise art and relies on the accuracy of track miles provided by Air Traffic Control to the flight crew coupled with pilot skill, weather conditions and operational circumstances. Additionally different aircraft types perform differently requiring varying operating practices to be utilised in order to slow the aircraft down and meet speed restrictions therefore the procedures in the ACoP are advisory rather than compulsory so there are no sanctions against pilots or airlines that fail to comply with the measures.

Despite this, Gatwick has advised that the publication of the ACoP has resulted in significant improvements in CDA achievement at all times of day and night. Airlines and pilots are keen to adopt this procedure for economic as well as environmental reasons.

Apart from CDA there are other long standing procedures in place to mitigate disturbance. These apply to both day and night time operations alike with the aim of keeping aircraft as high as possible for as long as possible. For example, there are specific distances and heights at which aircraft are required to be established on the ILS for final approach. Between 23:30 and 06:00 aircraft are required to join the ILS at not less than 3000ft and not within 10 nautical miles of the airport.

21. Are airlines charged for noisier aircraft?

Gatwick Airport charge noisier aircraft more to land than for quieter aircraft which provides an incentive for the airlines to introduce quieter fleets. Gatwick Airport's Noise Action Plan - available at <https://www.gatwickairport.com/business-community/aircraft-noise/> - illustrates the charging structure as of summer 2013 (pp31-32) and also the percentage of chapter 4 or equivalent noise certified aircraft (ie quieter aircraft) operating at Gatwick as of 2011 (baseline figure) which was 99.3%.

As aircraft operators continually upgrade their fleet, this figure is anticipated to increase further, and Gatwick have highlighted that they already have one of the quietest fleet in the UK operating out of the airport.

22. I am concerned about noise from existing aircraft – what can I do?

Gatwick Airport has a dedicated 'noise line' which you can contact by email - noise.line@gatwickairport.com - or by phone - 0800 393 070.

The London Airspace consultation by NATS and Gatwick on potential changes to Gatwick airspace proposed that aircraft will climb higher and more quickly on departure and stay higher for longer on arrival at the airport, with the net effect predicted to be less noise than at present. Also, there are continuing improvements in aircraft technology which will also help to reduce noise impact.

Gatwick has recently published its revised Noise Action Plan for the period 2013 – 2018 which identifies the airport will explore whether 'rotating respite' can be provided to communities most affected by noise from aircraft. It also highlights that other innovative methods to minimise noise - such as the airport's continuous descent approach, where aircraft use less thrust by gliding and descending at a continuous rate - will be explored as well. In addition, Gatwick have stated they will request that the Department of Transport (DfT) explores ways to describe and measure aircraft noise more clearly to help people understand noise impacts as well as ask them to undertake research on effects of aircraft noise on human health.

Further information is available at <http://www.gatwickairport.com/noise/>

Gatwick's Noise Action Plan is available at: <https://www.gatwickairport.com/business-community/aircraft-noise/>

However, it should be noted that aviation noise in the UK is specifically excluded from the Environmental Protection Act 1990. A House of Commons document deals with aviation noise which details the legislation that applies and also outlines the powers of various parties. Powers are limited when lawful activity is taking place, and environmental factors cannot be considered except when an airspace change is taking place: <http://www.parliament.uk/business/publications/research/briefing-papers/SN00261/aviation-noise-pollution>

23. The majority of noise complaints at night come from the Airbus A320 ‘whining’ as they approach the airport. Why is this and what is being done about it?

This whining or whistling noise is as a result of an issue with the airframe of the A320 where a fuel valve under each wing creates a whistle. This noise is only produced in certain instances when the aircraft is in a particular configuration and travelling at a particular speed; notably during approach due to some aperture in the wings.

Airbus has found a retrofit solution to address the problem. Gatwick Airport is encouraging all operators of the affected A320 family aircraft to ensure that the issue is rectified as soon as possible, be it through retrofitting or fleet renewal. Unfortunately the CAA have no powers to force operators to fix such a modification. The body that certifies the airworthiness of aircraft in the EU is the European Aviation Safety Agency (EASA), who are based in Cologne. <https://www.easa.europa.eu/>. This is a European Agency and just happens to be based in Germany.

In some circumstances, the EASA may issue directives which are mandatory for airlines to comply with and these are usually to do with safety. The airframe noise on the A320 series does not affect safety and whilst it is an environmental nuisance, there is no mandatory requirement to fit the modification - although the ‘fix’ has to be certified by EASA. EASA does however set European standards for aircraft noise and over the years many of the noisier aircraft have been phased out of service due to tighter restrictions. These standards cannot be phased in overnight as the design, procurement and life cycle of aircraft takes many years, and the new standards to be introduced in 2017 will only apply to future aircraft.

EasyJet, the largest operator of the A320 family of aircraft at Gatwick, have confirmed that they will take delivery of around 150 new aircraft over the next few years. The majority of these planes will replace their existing fleet; all these aircraft will already be modified and fitted with the vortex generators to address the whistling noise during their production.