



Policy & Resources
Committee

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HM Greffier
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22nd November 2019

Dear Sir

Letter of Comment – Requête – P.2019/105

Development of the Business Case and Cost Benefit Analysis for the Extension of the Runway at Guernsey Airport to create a 1,700 Metre Runway

I refer to the above Requête which is scheduled for debate by the States of Deliberation on 27th November 2019.

Deputy Kuttelwascher and six other Members of the States of Deliberation are seeking for the States to agree to:

1. direct the Committee *for* Economic Development to present a business case and cost benefit analysis for the extension of the runway at Guernsey Airport to achieve a length of at least 1,700m;
2. agree that this work should be completed by May 2020; and
3. direct the Policy & Resources Committee to make available the necessary funds to carry out this work, should they be required, to not exceed £360,000.

The Policy & Resources Committee acknowledges that these matters have wide-ranging implications and in accordance with Rule 28(2)(b) of the Rules of Procedure of the States of Deliberation and their Committees, consulted with the various Committees mandated with responsibility for the matters set out in the Requête.

Having due regard to these responses together with its mandated responsibility for leadership and co-ordination in the work of the States, especially developing and

promoting the States' overall objectives, the Committee does not support the Requête. It considers that it is premature following the decision of the States of Deliberation in their debate of the States of Guernsey Annual Budget for 2020.

The Policy & Resources Committee is commencing work, in consultation with the Committee *for* Economic Development and the States' Trading Supervisory Board, drafting a co-ordinated and coherent government framework considering all aspects of air route operation and support that is under the control or influence of the States of Guernsey. It is noted from its consultation response that the Committee *for* Economic Development will be well positioned to advise on the strategic case or otherwise for the extension of the runway at Guernsey Airport which it is already progressing as part of the work relating to the Committee's policy letter on air and sea links investment and policy objectives, resolved by the States of Deliberation in December 2018.

The Committee is also mindful that the question of whether the runway at Guernsey Airport should be extended has been subject of two recent debates in 2018 and 2019.

Further, whilst noting that Rule 23(5)(c)¹ of the Rules of Procedure applies specifically to the preparation of the Policy & Resource Plan Phase 2, it is appropriate that in prioritising resources this Rule should be considered when advising the States of all policy matters which will draw on its resources, including those proposed in a Requête.

The Policy & Resources Committee therefore proposes to lay a Sursis Motivé because the Propositions within the Requête:

- Are in direct conflict with Resolution 37 of the 2020 Budget;
- Will require the Committee *for* Economic Development to undertake an additional piece of work; and
- Conflict with previous directly relevant Resolutions of the States.

It was very clear from debate that the Assembly is looking for a co-ordinated approach, and it is illogical to now support and fund another analysis piece of air route operation and support in tandem. The Committee is working to a schedule to ensure that the April 2020 deadline will be achieved to inform States debate on a co-ordinated and coherent government framework considering all aspects of air route operation and support that is under the control or influence of the States of Guernsey.

The Policy & Resources Committee thanks the committees of the States for their policy advice with regards to the Requête. In particular, it wishes to also draw Members'

¹ Rule 23(5)(c) states: "The Policy & Resources Committee also works with Committees to ensure that, so far as possible, their policy plans are co-ordinated and consistent with the States' objectives and with each other; any conflicts and areas where prioritisation is necessary are identified; and the Policy & Resources Committee facilitates cross-committee working where policy areas span more than one Principal Committee."

attention to the Committee *for the* Environment & Infrastructure's response which refers to its on-going work on the development of a Long-term Infrastructure Investment Plan and concerns that there is a policy gap between the solution sought through the Requête and whether it is the right or best one for Guernsey. In other words, as identified by the Committee *for* Economic Development, the strategic case for any change at Guernsey Airport is not yet made, and certainly not the solution of a length of at least 1,700m promoted by the Requête. Similarly, the Director of Civil Aviation underlines the need for the consideration of an extension to the runway to be part of a wider review of all aspects of air route operation if the strategic case is to be made.

The Policy & Resources Committee recommends that the Requête should not be supported for the reasons set out in this letter. It invites Members to support the Sursis Motivé which will allow the Assembly to decide if, after consideration of the co-ordinated and coherent government air transport framework, there is a strategic need to re-open the debate on the length of the runway. Indeed, it is self-evident that any future debate on this Requête will benefit from a full understanding of the issues informed by an agreed framework considering all aspects of air route operation and support that is under the control or influence of the States of Guernsey.

Yours faithfully



Deputy G St Pier
President
Policy & Resources Committee

Enclosed consultation responses:

- the Committee *for* Economic Development;
- the Committee *for the* Environment & Infrastructure;
- the Development & Planning Authority; and
- the Director of Civil Aviation.

The President
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4 November 2019

Dear Deputy St Pier

Requête P.2019/105 - Development of the Business Case and Cost Benefit Analysis for the Extension of the Runway at Guernsey Airport to Create a 1,700 Metre Runway

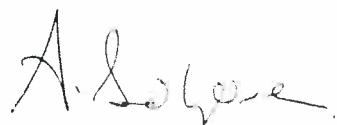
Thank you for the opportunity to provide a view from the Committee *for* Economic Development on this matter.

The Committee considered this at its meeting on 24 October 2019. Deputy Mooney recused himself from the discussion as he is a signatory to the requête, and Deputy Inder was not present at this meeting. While the President of the Committee has confirmed his support for the requête, Deputy De Lisle and I were in a majority of those present for the discussion and able to vote in not supporting the requête.

The reason for this is that I do not support the extension of the airport runway, and therefore do not believe that any further financial resource should be provided to this work; and Deputy De Lisle supports a runway extension, but only within the airport perimeter to 1570m with EMAS.

We have taken this view while acknowledging that officers are continuing to explore this option as part of the work relating to the Committee's policy letter on air and sea links investment and policy objectives, agreed by the States of Deliberation in December 2018.

Yours sincerely,



Deputy Andrea Dudley-Owen
Vice-President
Committee for Economic Development



Committee *for the*
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Deputy G St Pier
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12 November 2019

Dear Deputy St Pier

Requête P.2019/105

Development of the Business Case and Cost benefit Analysis for the Extension of the Runway at Guernsey Airport to Create a 1,700m Runway

Thank you for your letter dated 17 October 2019 regarding the above requête and seeking the Committee's views on this matter.

One of the roles of the Committee *for the* Environment & Infrastructure is to advise the States and to develop and implement policies on matters relating to the Island's infrastructure, which includes the airports in Guernsey and Alderney.

Predominantly, it is the Committee's responsibility to establish the need for infrastructure and develop policies in relation to that identified need (the 'what' and 'when').

If a strong case can be made, which fits with the priorities of the States as set out in the Future Guernsey Plan, the Committee would need to consider the strategic implications of providing that infrastructure. One of the States priorities, as set out in the Policy & Resource Plan, is the development of an Infrastructure Investment Plan. This is still in development but in its absence, the Committee will, from time to time, need to make decisions about infrastructure and it may be that the provision of some major infrastructure, like a runway extension, would mean that another infrastructure projects would have to be delayed. The Committee would then advise the States on any such implications, in accordance with its mandate.

Therefore, it is disappointing that the Committee has not been approached by those who have laid the requête to give it a greater understanding of the aims of the requête and to discuss why it believes that the current infrastructure is insufficient to meet Guernsey's needs. The policy gap must be established before the States endeavour to propose solutions, as it is only by taking this approach that we can be assured that the solutions are more likely to be the right ones

SLUP

The Strategic Land Use Plan (SLUP) provides the overall strategic policy direction for the planning system to manage the use of land in Guernsey. It emphasises the importance of achieving a balance between social, environmental, and economic land use requirements and recognises the importance of the timely provision of modern infrastructure, when needed. The SLUP has, as one of its core objectives, the maintenance and enhancement of modern key strategic infrastructure.

The SLUP highlights the importance of ensuring that the Airport can meet transport needs and acknowledges that external factors may trigger the consideration of a runway extension at some time in the future. Therefore, it directs the Island Development Plan to put policies in place which make provision for airport related development that ensures Guernsey Airport can meet modern operational standards and respond to opportunities to strengthen its contribution to the economy.

There are, therefore, no strategic land use principles which would preclude the principle of a runway extension being considered should the States decide there is sufficient evidence to demonstrate that should happen.

Areas of consideration

A project of this size would have a significant impact on the surrounding area and therefore any work to assess the costs, benefits, and disbenefits of it would be a huge undertaking.

The cost of the potential extension of the runway must not only be measured in terms of construction costs. A study on expansion of the runway would need to include an evaluation of the potential impact on all the following areas of importance to the Committee. These include the impact on:

- The environment
- Biodiversity
- Agricultural land (and potential loss of)
- Farming
- Climate change (including potential increase in carbon emissions)
- Energy policy (including future energy sources for aviation)
- The road network and its users
- The on-Island Integrated Transport Strategy
- Water reserves
- Pollution – Including - noise, light, water, and air pollution
- Security of supply of essential commodities

A negative impact on any of these areas would need to be accounted for by any study and must be included in any cost-benefit analysis. As an example, a loss of biodiversity could be measured using Ecosystem accounting.

It should also be borne in mind that on the 28 June 2019 the States resolved,

“that all Committees of the States of Deliberation when laying policy letters before the Assembly should assess therein any consequential impact on climate change of their proposals together with, where appropriate, their adaptation and mitigation actions”

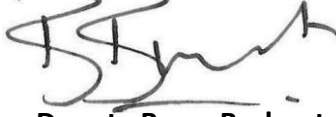
Any cost in any of these areas would need to be evaluated, together with the cost of any potential offsetting or mitigation measures and included in any business case presented to the States. Notwithstanding the fact that the Committee for Economic Development has already started looking at the merits of a possible runway extension, the Committee

believes that it would not be possible to complete the work by May 2020. To do so would be to invite real risk that some of the important factors listed above would not be considered in decision making.

The creation of a report, even if delivered by external bodies, would need significant input from officers on the areas highlighted above as part of this process. This work has not been prioritised because there has been no direction from the States that it should do so and the Committee is determined to deliver the valuable work it needs to as part of the Future Guernsey Plan and its own Policy Priority Plan such as Energy Policy, a Climate Change Action Plan, Long term Infrastructure Investment Plan, the On-Island Integrated Transport Strategy, and the Biodiversity Strategy.

Given that several reports have been considered by the States and debates have taken place in the Assembly on related issues, the Committee has not, to date, seen evidence that a business case can be formed that makes a robust case for the extension of the runway. In particular, as stated above, there has been no articulation of the policy gap and the Committee believes the States would be ill-advised to proceed without an understanding of the problem. Until such time that the States indicates this is a priority, and allocates the appropriate resources, the Committee is of the view that it is best focussed on delivering its existing priorities, already set out by the States.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Barry Brehaut', with a stylized flourish at the end.

Deputy Barry Brehaut

President

Committee *for the* Environment & Infrastructure

The President
Policy & Resources Committee
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29 October 2019

Dear Deputy St Pier

Requête – P.2019/105

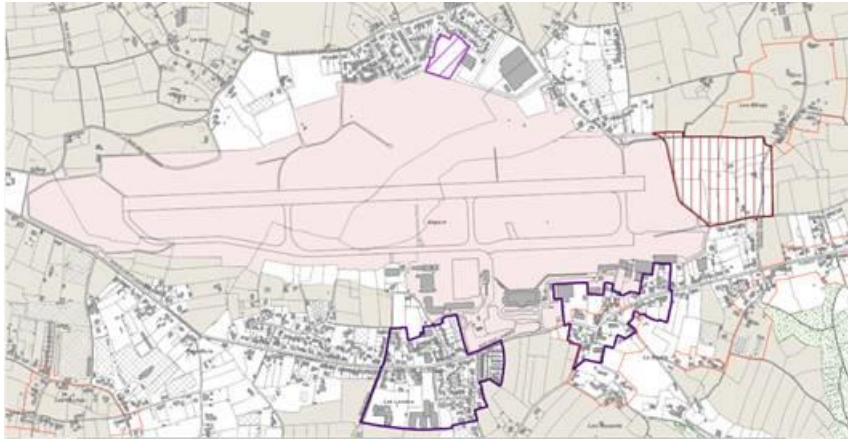
Development of the Business Case and Cost Benefit Analysis for the Extension of the Runway at Guernsey Airport to Create a 1,700 Metre Runway

Thank you for your letter of 17 October 2019 concerning the above Requête.

The Island Development Plan (IDP) which was approved by the States in November 2016 identifies a safeguarded area on land to the east of airport land at Guernsey Airport for a possible runway extension. In this respect, the IDP states in paragraph 20.6.4 as follows:

“Ensuring that Guernsey Airport is able to meet transport needs in the future is essential to the co-ordinated and cost effective delivery of a key public service for Islanders and visitors and is also vital to the local economy. The Strategic Land Use Plan requires provision to be made in the Island Development Plan to ensure that Guernsey Airport is able to meet modern operational standards and respond to opportunities to strengthen its contribution to the economy (see Policy IP4: Airport Related Development). While there is no current evidence that an extension to the length of the airport runway is required to meet economic or operational needs and while advances in aircraft technology might reduce the need for a longer runway in the future, this is something beyond local control. It is also possible that other external factors, such as United Kingdom hub airports not accepting smaller regional aircraft, may trigger the consideration of a runway extension sometime in the future.”

The safeguarded area is shown by a brown outline and vertical hatching on the extract from the IDP Proposals Map below.



IDP Policy IP5: Safeguarded Areas, provides that:-

Development within Safeguarded Areas will be supported where:

- a. the proposal is in accordance with an approved Development Framework; or,
- b. the proposal would not inhibit the implementation of an approved Development Framework or prejudice the future implementation of development the purpose for which the area has been safeguarded; or,
- c. the development is of a minor or inconsequential nature which would not prejudice the future implementation of the development the purpose for which the area has been safeguarded; and,
- d. the proposal is in accordance with all other relevant policies of the Island Development Plan.

The IDP however also confirms that by designating this safeguarded area it is not implied that there is any commitment that such development will take place but that the purpose is to protect the area identified from any development that may compromise its possible future use for a runway extension.

Development of an extension to the runway within the safeguarded area will require a Development Framework. Where a Development Framework is approved it will be taken into account when considering proposals in the area to which it relates and proposals will be expected to accord with the approved Development Framework. Proposals for extension of the runway will also require an Environmental Impact Assessment.

Should part of a proposed future runway extension be located outside of the safeguarded area on land to the east of airport land at Guernsey Airport, then it is likely that, notwithstanding Policy IP5, this would be considered on the basis of IDP Policy S5: Development of strategic importance, for which a Local Planning Brief would be required, which would necessitate a Planning Inquiry along with reference to the States for approval.

I hope this this information is helpful. Beyond this the Development & Planning Authority has no comment to make at this stage concerning the prayer of the Requête.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Dawn Tindall', written in a cursive style.

Deputy Dawn Tindall

President, Development & Planning Authority

4th November 2019

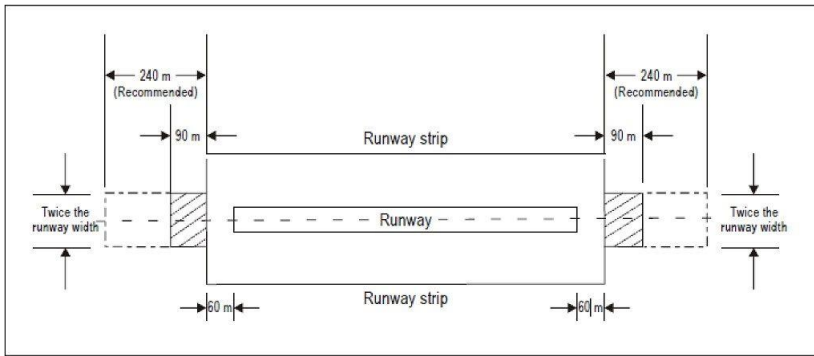
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Dear Mr President,

The DfT (Department for Transport) policy position is that the UK (including all its constituent parts – UK main, CDs and OTs) are to comply with ICAO's (International Civil Aviation Organisation) standards and recommended practices (SARPs). The RESA (Runway End Safety Area) "The surface surrounding the runway prepared or suitable for reducing the risk of damage to airplanes in the event of an undershoot, overshoot, or excursion from the runway" in Guernsey is not currently compliant with the SARPs, there should have been a safety case based on a risk assessment that explained how the risks of not meeting the SARP were being mitigated. There are examples where it is not possible due to topography to meet the recommended practice (cliff, river or mountain) but all airports should meet the standard and there are risk assessments in place to mitigate the risks of not meeting the recommended practice.

My regulatory view regarding extending the current declared distances by reducing the RESA is not acceptable as it is currently not compliant, and I would also be taking on risk in allowing the airport to reduce safety levels.

If the intention is to extend the runway at Guernsey, ICAO is clear that when extensions are planned to existing runways, complying with the SARPs should be factored in at the design stage. I will always plan to be compliant rather than planning not to be; doing the latter would be indefensible should an accident occur where the lack of a compliant RESA was a contributory factor. Also, it is inappropriate to 'carry over' an existing non-compliance when doing runways expansion works. In other words, an argument that the runway has never had a compliant RESA would be challenged as the opportunity existed to meet the SARP during the extension work. This sometimes results in the work not viable as very little is gained for what is a significant financial output. However, as the Regulator, any extension of the runway with a fully compliant (ICAO recommended length of 240m) RESA would be acceptable.



Yours Faithfully,

Dominic Lazarus
Director Civil Aviation