

Contact:

Ms Claire Tester 01444 477322, Fax: 01444 477507
E-Mail: Claire.Tester@midsussex.gov.uk

Your Ref:

Our Ref: CT/

Date: 15th May 2014

Gatwick Airport Ltd
consultationqueries@gatwickairport.com

Dear sirs,

Re: MSDC Response to GAL Consultation on Runway Options

The following is the response of Mid Sussex District Council to Gatwick Airport Ltd's consultation on the options for a second runway at Gatwick.

The District Council cannot yet come to a view on whether to support the principle of a second runway at Gatwick as there is insufficient evidence available to assess the impacts on this district. However, the District Council would like to use this consultation as an opportunity to identify potential impacts that will require further work.

These comments have been informed by input from the Town and Parish Councils in Mid Sussex, some of whom will also make their own individual responses. The response also takes account of additional issues raised by District Councillors in the Members' Workshop held on 8th May and attended by Gatwick Airport Ltd and Gatwick Area Conservation Campaign.

Potential Impacts

With regard to the three options proposed, clearly Option 3 – the wide spaced parallel runway with independent mixed mode – would have the greatest potential impacts of all the options due to the increased capacity facilitated by this option.

Passenger Impacts

Further information is sought on the type of demand that the second runway would seek to meet – i.e. short haul or long haul and leisure or business. Increasing capacity at Gatwick may increase the choice of routes and availability of flights for Mid Sussex business and leisure passengers. However it is not clear how many people in Mid Sussex are currently traveling to alternative airports to access flights. As well as giving a better understanding of the potential for enhanced passenger experience, this information would also assist in understanding the transport impacts on Mid Sussex.

Employment Impacts

It is acknowledged that the additional airport related business accommodation created by a second runway could result in local jobs for current and future generations living in Mid Sussex. However, this depends on the nature and quality of these jobs and how they relate to the skills of residents in the area. Generally Mid Sussex has a very highly skilled workforce, and approximately 50% of residents commute outside of the District to work. An increase in jobs which do not match these skills would result in further housing pressure to accommodate imported workers (see Urbanisation impacts below). It would also exacerbate the current gap between average incomes and house prices.

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It is noted that the work undertaken so far on assessing job numbers only takes account of direct jobs (on airport), indirect jobs (such as suppliers) and induced jobs (such as hotels). If further work is undertaken to assess the catalytic impact (i.e. businesses that may move to the area due to the presence of an expanded airport) then the District Council would want to be satisfied that the methodology is sound and consistent with that used to assess the other airport options the Commission will consider. This will enable the Council to better understand the implications of a second runway at Gatwick on our area.

Further evidence is also sought on the implications for the district if the additional runway capacity goes to Heathrow rather than Gatwick. This should be in the form of direct empirical evidence of similar examples rather than just speculation about what might happen.

Urbanisation / Housing Pressures

Mid Sussex, and this part of the south east in general, already have significant housing pressures which may not be met due to environmental and infrastructure constraints. The additional employment created by a second runway could potentially increase the need for further housing and associated infrastructure. Potential impacts include:

- further pressure on the character of existing towns and villages due to urban extensions and loss of greenspace within settlements;
- further pressure on the gaps between settlements and the separate identity of towns and villages;
- further pressure for a new settlement in the area, with consequential impact on valued countryside and wildlife habitats and infrastructure.

Transport

Increasing the capacity of the airport will require a substantial investment in road infrastructure together with improvements in public transport. The current proposals focus exclusively on improvements to junction 9 of the M23 and already programmed works. Increased traffic on local roads will need to be mitigated including:

- the M/A23, especially junction 10, but also the need for three lanes along its whole length from the M25 to the A27;
- M25 anticlockwise exit onto southbound M23;
- The M23- M25 link with Heathrow;
- East / west routes in general, but especially
 - the A264 east bound from M23 J10 has major bottlenecks at Felbridge then onto A22 at East Grinstead;
 - the C319 through West Hoathly and Sharpthorne;
 - A272 from Winchester to the A22 at Maresfield;
- the B2028 through Crawley Down, Turners Hill, Ardingly and Lindfield.

Proposed improvements to the rail service are also restricted to Gatwick station and already programmed investment. It is also not clear whether these improvements will apply to the whole of the London to Brighton line or just the stretch north of Gatwick. Further improvements will be needed to increase capacity between Brighton and Gatwick, and to east-west routes, to mitigate some of the traffic impacts and allow areas of higher unemployment to be more easily linked to Gatwick. This would allow the jobs benefits to be spread to an area of higher unemployment and reduce the need for workers and travellers to rely on private car as a means to access the airport. This will potentially mitigate some of the pressure for housing.

Public transport to the airport from East Grinstead and surrounding villages should also be extended from early morning to late night for staff and passengers to and from the airport. A direct link by train between Gatwick and Heathrow and to Ashford should also be investigated. Passengers could be encouraged to use trains rather than cars by including a discount on train fares included in the plane ticket price.

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INVESTOR IN PEOPLE

Head of Economic Promotion and Planning



It is questioned whether capacity can be expanded sufficiently to meet projected increased rail demand generally on the London-Brighton link, and increased demand from Gatwick. The improvements proposed are already in current plans and are designed to meet current projected needs not increased needs from the airport.

Other Infrastructure

Any significant increase in activity in and around Gatwick Airport will need to be supported by enhanced infrastructure available at the very least concurrent with the expansion of the airport. Discussions should take place with appropriate authorities to properly cover these needs. In particular there is a lack of adequate hospital facilities near the airport in the event of a major incident. Emergency services provision would need to be reviewed in the light of the increased number of aircraft and therefore higher risk of incidents involving aircraft.

The increased employment created by the airport expansion may result in the need for further housing, which would then generate the need for further water and sewerage provision, healthcare facilities, schools etc.

Airport Operation and Flightpaths

The information provided with the consultation does not include any indicative flight paths or noise contours (other than for aircraft landing and taking off). The effect of any changes to flight paths needs to be understood in order to make a full response to the proposal for a second runway. This should include any proposals to change the facility for night flights, narrow the flight path corridor or introduce respite periods for severely affected areas.

Noise

Noise from aircraft at low altitudes is an issue for the northern part of Mid Sussex, where flights are generally at a lower altitude. Information should be provided on the effects of more air traffic noise on the human and natural surroundings to the airport. Where detrimental effects are found then a plan and mitigation for this should be put in place. The offer to pay noise insulation compensation is welcomed but should be accompanied by other mitigation such as investment in health care. Perception of annoyance from noise is not necessarily associated with noise level, it can also depend on the relative tranquillity of the current environment. Analysis of noise models will need to take account of frequency of peak noise occurrence, peak to mean ratios, time of day and time of year (ie whether windows are likely to be open).

Further information should be provided on:

- Noise contours for each option;
- The assumptions behind these contours (i.e. about the type of aircraft etc);
- Proposed noise monitoring and mitigation / compensation.

The southern part of the district may be affected by proposed air corridors and stacking areas. There are also potentially issues for the whole district in relation to the increase in traffic noise, particularly on the A23. Traffic noise is already problematic for residents of villages (e.g. Sayers Common) adjacent to the A23 and this would be exacerbated by significantly greater volumes of traffic. This could be mitigated by upgrading the A23 to 'low noise' surfacing.

For those who live close to or downwind from the airport, ground noise is also an issue. This arises from aircraft manoeuvring around the airport and also from engine testing. Additional aircraft using the airport is likely to increase this noise and mitigation measures should be considered.

Air and Ground Pollution

Pollution from existing and additional air traffic may affect the residents in the north of Mid Sussex, the surrounding countryside and the Ashdown Forest (a European protected site under the Habitats Regulations). More aircraft will result in more emissions; therefore studies as to the effect on the air pollution and especially the effects on the Ashdown Forest must be carried

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out. This should take into account the effect of narrowing the flight paths, therefore intensifying emissions over a smaller area.

Information should be provided on

- Levels of pollution predicted for each of the runway options;
- The assumptions behind the air pollution model;
- Steps to be taken to mitigate any damage caused;
- Proposed monitoring arrangements (by an independent organisation).

Additional air traffic may also result in more ground pollution from oil etc. Evidence should be provided on whether aircraft contribute to this problem and, if so, what mitigation will be provided.

The additional traffic created by the airport and associated jobs will also add to air pollution. This will be particularly an issue around the airport itself where the additional proposed car parking will concentrate the effects. Further work should be carried out to quantify and mitigate this impact.

Flooding

Increased building, development and large areas being tarmacked is likely to increase opportunities for flooding with less area for soak away. Given the recent flooding at the airport, information should be provided about how this will be addressed. In particular, the proximity to Gatwick of the River Mole and other underground streams that cause flooding must be taken into account.

Layout of Airport

More parking would be required by all the runway options, but there does not appear to be any detail on where this would be. If this cannot be accommodated on the airport then this would lead to further pressure for off-airport parking, possibly in Mid Sussex. Any redesign of the airport should take the opportunity to improve the experience of passengers travelling by car and make it less confusing and more accessible. Such redesign should also take account of safety implications, in particular of the new terminal being built between two runways.

Conclusion

In summary, the District Council is not in a position to either support or oppose the principle of a second runway at Gatwick or the location / design of such a runway without clarification on the above matters. It is noted that the submission to the Davies Commission by GAL this week differs from the consultation material in the following respects:

- Passengers numbers per year have increased from 87 million to 95 million by 2050;
- Local jobs created has risen from 17,500 to 22,000. In the press release the number of jobs created is quoted as 122,000 for the entire London and South East Region;
- The number for local housing has increased from 7,000 additional homes to 9,300.

It is not known what the basis of these revised numbers is, and the District Council would seek a better understanding of the evidence base which presumably sits behind these projections.

Yours sincerely,



Councillor Gary Marsh
Deputy Leader and Cabinet Member for Economic Development and Property

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Head of Economic Promotion and Planning

