

## **A Response to the Airports Commission Consultation on a second runway at Gatwick**

This response is based upon the Consultation Questions outlined in the Airports Commission consultation document – Increasing the UK’s Long-term Aviation Capacity – which was published in November 2014. It focuses exclusively on the proposed development of a second southerly runway at Gatwick which, from the information supplied so far, **I strongly oppose** on the following grounds:

- a) The destruction of the Strategic Gap between Crawley and Gatwick to extend the airport ;
- b) The prospect of Crawley coalescing with Gatwick Airport is undesirable and unwelcome;
- c) The Ifield Village Conservation Area will lose its setting, identity and character;
- d) The predicted noise contours appear to be substantially incorrect;
- e) The proposal is not fully funded by Gatwick, as it should be, and as they claim it to be;
- f) The compensation proposals are basically unfair for those closest to the enlarged airport;
- g) The hidden costs to the northern neighbourhood communities of Crawley and those who live further afield under the flight paths have not been properly quantified and assessed.

It would be inappropriate for me to comment on the viability or not of the two Heathrow options as I do not have sufficiently detailed local knowledge of the area. Conversely, I do have local knowledge of the Gatwick area as, for the last 27 years, we have been a relatively close neighbour of the airport. So, before dealing with the specific consultation questions I wish to set out the background against which I base my opposition as, without this, my responses may not adequately reflect the depth of concern that I have.

### **Background**

[REDACTED]

[REDACTED]

[REDACTED]

Recent reading has informed me of the following:

- The ideal ambient noise level in dwellings is 35dB, but for sleeping areas this reduces to 30dB;
- An acceptable level for airborne noise transmission through walls, roofs etc. is 40-43dB;
- The 57dB contour line is recognised as being the onset of serious community annoyance;
- Noise intensity rises on a logarithmic scale - a 10dB increase is normally perceived as a 'doubling' in loudness, thus a 20dB increase would quadruple the loudness, and so on...

However, not really understanding what these noise levels actually mean, I have used and intend to continue to use a noise meter to measure the current dB levels in and around our property. This tells me the following:

- Ordinary daytime noise levels within the house are within the range 21-24dB;
- Daytime noise levels within the house during a take-off rise to a maximum of 45-58dB;
- Ordinary daytime noise levels outside the house are within the range 27-44dB;
- Daytime noise levels outside the house during a take-off rise to a maximum of 63-72dB.

The final figure seems to conflict with the published data from the CAA and Gatwick Airport as it is around 10-15dB (20-25%) greater than the levels they indicate.

**Air Quality:** It is difficult for uninformed members of the public to assess the extent to which airborne pollution from the airport has been affecting our lives – we haven't got the necessary equipment to measure this. However, when the wind is coming from the north east and the planes are taking off in an easterly direction there is the distinctive and objectionable smell of aviation fuel in the air, from which there is no escape. (As above, this is happening right now in the evening of 22<sup>nd</sup> January as I am writing this response.)

**Flooding:** The Tweed, its garden and its paddocks are bounded on two sides by the River Mole and Ifield Mill Stream and the grounds have, over the years, been subjected to a degree of flooding. Fortunately, flood water has never entered the house or outbuildings, although our more northerly neighbours in Tweed Lane have been less fortunate. A couple of days before Christmas 2013, severe weather hit the south of England causing serious flooding combined with an extensive power outage in the north western neighbourhoods of Crawley. Recently implemented flood prevention measures around Crawley as part of the Upper Mole Flood Alleviation Scheme successfully minimised the problem elsewhere in Crawley but for Ifield it was the worst I have known. The runway at Gatwick was flooded, together with their auxiliary power supply (bizarrely installed underground in an area known to flood!) and the airport was out of action for over 24hrs causing considerable and well documented misery to Christmas Eve air travellers. Considerable misery was also inflicted upon local residents as, according to a couple of employees of Crawley Borough Council who were checking the state of flood waters in Ifield on a regular basis at that time, part of Gatwick's defence against the swiftly rising flood waters was to close a sluice on the River Mole on the southern side of the runway. This had the effect of causing flood water to back up into properties alongside The Mole thus exacerbating an already extreme situation. For the ensuing six days the flood waters remained and our sewerage drains were inundated twice and overflowed for periods in excess of 24hrs.

The Environment Agency was aware some years ago that Ifield was a flood prone area. Indeed, the flood prevention measures referred to above – the Upper Mole Flood Alleviation Scheme – included provision for four flood storage reservoirs (FSRs); at Tilgate Lake, Worth Farm, Clay's Lake and Ifield. By December 2013 work had been completed on two of them and was ongoing at a third, but in 2011 the plans for Ifield's FSR had been 'called in' for lack of funding. It is common knowledge in the local area that Gatwick Airport, who were to be the major beneficiary of the Ifield FSR, had refused to contribute their fair share of the costs and in so doing had stalled the initiative. Whilst it can be argued that the flooding in December 2013 was caused by severe weather, two separate economically-biased but ill-judged decisions taken by Gatwick Airport were responsible, in no small measure, for the considerable Christmas misery caused to both their clients and their near neighbours.

**Conservation Area:** The Ifield Village Conservation Area was originally designated in 1981 as a relatively small area surrounding St Margaret's Church. It was extended substantially in 1992 to include Ifield Village Green, Rectory Lane and Tweed Lane. Subsequently it was further extended to incorporate the grounds of a Sports and Social Club owned by Edwards High Vacuum (a subsidiary of BOC) and then finally extended in 2013 to incorporate Langley Lane and a substantial section of Ifield Green. Although most of the land in the Conservation Area was purchased from private owners in 1940 as part of the development of Crawley New Town, it was left untouched by the development of the New Town and has gradually returned to private ownership. As such, its period of public ownership served it well as the buildings, open spaces and road patterns remain much as they were before the Second World War. Its designation as a Conservation Area has done much to maintain the look and feel of the village, reflecting the definition of Conservation Areas (Section 91 of the Planning (Listed Buildings and Conservation Area) Act 1990) as '*an area of special architectural or historical interest, the character or appearance of which it is desirable to preserve or enhance*'. It falls to the responsibility of the local council, in this case Crawley Borough Council, to reinforce the provisions of the Act by ensuring the creation of a Conservation Area Statement which sets out the Council's proposals for the protection, preservation and enhancement of the area. Within the current Conservation Area Statement are a set of agreed objectives which form the base against which any proposed change is tested: I set these out below.

#### **"OBJECTIVES OF THE CONSERVATION AREA**

*The aim of the Conservation Area is to preserve and enhance the historic character and appearance of the village and surrounding countryside. This does not imply that all new development and change is to be prohibited but that proposals for change should be consistent with the intrinsic features of the Conservation Area. The character and appearance of the Ifield Village Conservation Area are created by:*

- *rural fields and setting*
- *scattered village settlement pattern*
- *low density residential development*
- *recreational land use*
- *road layout*

*The general objectives for policy and proposals for the Conservation Area are therefore:*

1. *to protect the village character and setting and prevent the Conservation Area becoming a rural island in an urban area,*
2. *to retain the historic scale, character and appearance of the village settlement,*
3. *to protect the surrounding fields and open space within and adjacent to the Conservation Area from development which would be out of scale, character and appearance with the local rural environment,*
4. *to retain buildings and other features which contribute to the village character of the Conservation Area,*
5. *to promote environmental enhancements within the Conservation Area consistent with its village character."*

These policies are designed not only to protect the Ifield Village Conservation Area, but most especially the setting, environment and character of the thirteen nationally listed buildings that fall within its boundary. It must be remembered that such buildings, especially those in the countryside, were never constructed to cope with 21<sup>st</sup> Century noise levels...

**Crawley:** When originally conceived as a New Town, Crawley's population was expected to grow to around 50,000 people – it is now home to more than 100,000 residents. The town has reached the limits of its expansion, there being no significant areas of land which are available for and can be allocated to new housing. However, in spite of its proximity to Gatwick Airport it still maintains its original identity as 'a town in the country'.

Crawley provides jobs not only for residents of the borough but also for the wider area – this results in over 24,000 commuters travelling into the Crawley borough each and every day. This is already evident from the sheer volumes of rush-hour traffic and resultant queuing on the ‘commute-in’ roads from north, south, east and west of the borough.

**Surface Transport:** As a long-term (1988-2003) commuter to London from Three Bridges Station I was a regular user of trains which carried overseas travellers to and from Gatwick. Apart from the Gatwick Express, which was priced beyond the regular commuters’ pocket, there was no provision on the trains for holiday travellers with (invariably) several large suitcases and/or ski equipment. They were placed on seats, in the narrow gaps between the seats or in the standing area by the doors because the luggage racks were too small and dangerous to use. In any of these areas they caused frustration to the regular users of the trains especially if access to the on-board toilet was needed. Being now retired I am a far less frequent user of the trains, but from recent trips to London I know that the situation has not improved.

These days, I am a far more regular user of the road network, both during and outside of the rush-hour. The M25 remains a nightmare, in spite of the recent widening of the southern Surrey stretch between the M23 and M26 junctions. I would therefore question any form of development which places the M25 under greater strain than already exists with current traffic volumes. The recent improvements to the A23 at Handcross Hill have resulted in improved traffic flows in the southern stretch of the M23, but whenever there is a problem at Gatwick itself (such as flooding), airport traffic backs up onto the M23 in both directions causing significant danger and delays to non-Gatwick road users.

**Value:** When we moved to Ifield, we accepted the blight, such as it was, of an International Airport close by. The western end of the runway was, and remains 1.8 kms from our front door, as the crow flies. Indeed the value of the property reflected the proximity of the airport as well as the ease with which we could access the town, the countryside and fast, direct rail links to London. A recent valuation informed us that the proximity of the airport has little direct impact on the value of the property as we are currently within a noise contour that is generally not troublesome.

## Our response to The Consultation Questions (in relation to the Gatwick Proposal only)

**Q1:** What conclusions, if any, do you draw in respect of the three short-listed options?

**Our House:** The western end of the proposed second runway will be 750 metres from the front door of our property: the airport perimeter fence will be just 350 metres away. The airport, with its attendant noise and air pollution, will be 4.5 times closer than at present.

Conclusion: The proposed development of a second southerly runway will destroy the north and northwest rural countryside setting and amenity of our property, at both ground level and in the air. Planes that were acceptably distant will appear much larger and more visually intrusive whilst the perimeter fence will give the feeling of being close to a prison.

**Noise Pollution:** Our lives will change considerably through a substantial increase in noise levels:

- The noise contour for the northern part of Tweed Lane is predicted to become 63-66dB – from that prediction I estimate that for our property the noise intensity will be 64dB, giving an increase of 12dB and more than doubling the noise level we have to endure.
- It is widely accepted that a noise level of 57dB is recognised (CAA website) as being the onset of serious community annoyance: 64dB is at least 75% louder.
- I have measured the aircraft noise levels along Bonnetts Lane at a position similar in distance from the current runway as The Tweed will be from the western end of the proposed runway. Over two separate samples of 10 planes – one in the morning (28<sup>th</sup> Jan) and one in the afternoon (27<sup>th</sup> Jan), the average maximum noise levels were 77.1dB and 70.8dB and for each period the loudest planes were registered at 87dB and 75dB respectively.
- The consultative document produced by Gatwick Airport in April 2014 infers (on page 71) that 66dB is a **medium** level of noise, yet 57dB (10dB less and thus half as noisy) is recognised as being the onset of **serious community annoyance** – I do not see how these two statements square up. My own reading challenges Gatwick Airport's somewhat optimistic description: 64dB is about midway between very noisy (loud speech) and loud (busy pub). However if, as my dB measurements suggest, the more accurate contour should be 70-77dB, the argument over wording moves into a different territory.
- As the number of aircraft movements will eventually be double that which we currently experience, the increased noise intensity will be far more intrusive.
- The prevailing winds are from the west and it has been estimated that 74% of flights will take off in a westerly direction, so the planes will be just a few seconds into their flight and on full thrust when they are closest to us. This renders all noise reduction landscaping measures (bunds) useless for 74% of the time.
- Soundproofing the building will improve the situation, but open windows during the summer will substantially reduce its effectiveness.
- Sadly, we cannot soundproof our garden.
- Previous experience tells us that night-time construction work can be extremely noisy, and this will now be much closer to our property. For the sake peaceful nights in the northern part of Crawley a night-time working ban should be imposed on the development, with severe penalties for any breach irrespective of deadlines and slippage.

I have therefore made preliminary enquiries as to the likely costs of providing adequate sound-proofing measures that are legally acceptable within a Grade 2 listed building: my source is the Listed Property Owners Club, of which I am a member. Their response was as follows:

*"It is difficult to predict the consequences of the law in a situation like this. The requirement to apply for listed building consent for any alteration which affects the character of the building remains the same but applications may be considered more flexibly than in normal circumstances because of the need to achieve sound reduction. The Secretary of State could even instruct local authorities or the Planning Inspectorate to apply normal policies flexibly."*

*Noise reduction normally requires strict attention to windows, doors and any apertures such as ventilation ducts which pierce the wall. Installing secondary glazing (using extra thick glass is normally achievable in listed buildings but to maintain noise reduction the windows need to be kept shut so special sound attenuated mechanical ventilation is required. Doors can sometimes be replaced with heavier doors and door frames so long as the originals are not of great architectural or historic significance. The other weak point may be the roof. Roofs (and possibly your tile hanging) unlike walls do have the mass to give meaningful noise reduction so sound absorbing quilt may be required if you have access to a roof space. If not, I do not know what could be done. It is unlikely that you would need to alter the walls of the building.*

*You are of course right that the cost of these measures could cost many times more than the £3000 quoted.*

*I should say that my expertise in sound attenuation is limited and that it is a specialised field. You will in due course need to take advice from an expert in the field. The professional fees for the design expertise and making the necessary application for listed building consent could be well in excess of £3000."*

Conclusion: I have drawn two conclusions; one is very specific whilst the other is more general:

1. Our dwelling was built at a time when air travel was but a distant pipedream, so it is ill-equipped to cope with 21<sup>st</sup> Century noise levels. We conclude that the proposed Community Dividend (£1,000 per annum) and contribution towards soundproofing measures (£3,000) will fall well short of the costs we will need to incur to reduce noise levels within our dwelling to current and thus acceptable levels.
2. It also concerns me that my own noise measurements indicate that the predicted noise contour maps in Gatwick Airport's April 2014 Consultation Document are too low by a factor of between 10-20%. This, of course would be consistent with Gatwick Airport's penchant to understate the noise impact their proposal will have on their neighbours. Naturally I would like know what the true figures are and that they have been properly and independently verified.

**Air Quality:** There will be two runways, thus two sources of air pollution, one of which will be 1045 metres closer to our property. As already stated, I'm not a specialist in this field, but I am amazed that the Airports Commission has not undertaken its own dispersion modelling in order to either validate or challenge Gatwick Airport's assertion that existing EU limits will not be compromised in the northern neighbourhoods of Crawley. I remain concerned that air quality will significantly reduce at our property, especially when planes are taking off in an easterly direction: during the summer months the smell of aviation fuel may well drive us indoors!

Conclusion: Prior to making its recommendations to Government in the summer, the Airports Commission should undertake its own dispersion modelling in order to either validate or challenge Gatwick Airport's assertion that existing EU limits will not be compromised in the northern neighbourhoods of Crawley.

**Flooding:** Gatwick Airport does not have a track-record of care for the local community when it comes to matters of local flooding – they have been bad neighbours. Whilst they may be changing their attitude towards funding the proposed Ifield Flood Storage Reservoir (part of the Upper Mole Flood Alleviation Scheme) as a result of the catastrophic flooding in the area around Christmas 2013, it would appear to us that nothing much is happening at present. However, what has happened to us is that, as a result of the Christmas 2013 floods, our property insurers have increased our renewal premium as part of our land has been upgraded to Flood Zone 3.

Conclusion: Gatwick Airport need to complete their further hydraulic modelling work with regard to the Ifield Flood Storage Reservoir as a matter of urgency and commit to a fair and reasonable contribution towards the completion of the Upper Mole Flood Alleviation Scheme irrespective of the ultimate conclusion of the Airports Commission's study.

**Conservation Area:** The western end of the proposed second runway will be 620 metres to the north of the Ifield Village Conservation Area whilst the airport perimeter fence will be just 220 metres away. The airport will be over 5 times closer than at present. The entire Conservation Area will fall within the 57dB-66dB contours thus causing 'serious community annoyance' to all who live, work, worship and play within its boundaries. Already enclosed on its southern and eastern sides by urban development, the village character and rural setting of the Conservation Area relies upon the farmland and open countryside to the north and west. The fields to the north provide a valuable countryside buffer against any *"development which would be out of scale, character and appearance with the local rural environment"*: a substantial proportion of these very fields would fall within the revised airport boundary thus further encircling the Conservation Area and depriving it of its rural northerly setting.

Conclusion: Four of the five general protection principles of the Ifield Village Conservation Area will be seriously compromised leading, I suggest, to a gradual demographic change somewhat similar to the fate of Lowfield Heath. What used to be a little Sussex village alongside a small recreational airfield has now become no more than an extension of Gatwick airport providing hotel accommodation (now closed), a substantial number of related offices/industrial units and a detention centre. The church remained active until a few years ago but, as there were no remaining houses, finally succumbed to the inexorable creep of the airport and has now been decommissioned. Lowfield Heath, as a community, just died. Whilst Ifield as a neighbourhood of Crawley is much larger and thus more resilient I can foresee that the Conservation Area will change, because the Strategic Gap that had been deliberately left undeveloped between Crawley and Gatwick Airport, to ensure that the two entities remained separate, will have been sacrificed to airport expansion. In fact, for the more urban parts of Ifield the Conservation Area will become its de facto Strategic Gap. The Conservation Area will remain but at its most northerly end the character and setting will be defined by substantially increased noise levels, large aircraft, the airport boundary and any associated perimeter road rather than, as at present, by its rural setting, its traditional buildings and their occupants.

**Crawley:** Although physically separated from Gatwick Airport, the town has enjoyed greater prosperity and lower unemployment since the 1960's, mainly as a result of the growth of the airport. These benefits have come at a cost – overcrowded roads, a skewed demographic mix which reflects the employment requirements of the airport and insufficient housing. Even though the town and airport are now inextricably linked, it has been the policy of successive councils to maintain a lowly populated Strategic Gap between the two so as to protect Crawley residents from an 'airport take-over' and allow Crawley to maintain its individual identity. The Strategic Gap has also achieved the added benefit of providing a wild-life haven and Crawley has continued to be 'a town in the country'. By allowing the airport to expand into the Strategic Gap and thus coalesce with the town, there will be nothing left to stop the gradual spillage of Gatwick into Crawley, culminating eventually in the creation of Gatwick City (as some have suggested it should be called).

Gatwick Airport and the Airports Commission appear to disagree on the number of new jobs and associated housing that will be created by building a further runway at Gatwick. On the one hand there seems to be an a general feeling that the small additional demand for housing will be able to be satisfied by schemes that are already planned within Crawley and its close environs but on the other hand, Gatwick Airport is heralding a substantial increase in employment opportunities which will either increase the borough's housing need or increase 'commuting-in'. In consequence, the associated local infrastructure costs of the development of a second runway may well be understated by Gatwick Airport and, in the worst possible scenario, left as expenditure for the public purse.

Conclusion: Before any decision is taken in favour of a second runway at Gatwick, the resultant impact upon Crawley, – its infrastructure, its housing needs and its roads – must be more clearly understood, costed and built into the Business Case.

**Surface Transport:** I believe that the assumptions on existing capacity that have been made will lead to severe problems in the future. The expansion of Gatwick will place heavy additional demands on both rail and road networks, yet it appears that only a minimum of additional expenditure has been allocated for both forms of transport within Gatwick Airport's cost-justification for the second runway.

My concerns are as follows:

- There is only one rail link up to East Croydon, albeit 4-track, thereafter there are several links to London. To realise Gatwick Airport's basic assumption that greater use will be made of rail transport in the future, further expenditure will need to be provided (presumably by Gatwick) to improve the resilience of the service against a major incident to and beyond East Croydon. East Croydon has proved to be fragile in the past and an international airport must be able to rely upon a more robust service than can currently be provided.
- The lines from the south coast that run through Three Bridges and Gatwick to London provide a heavily used commuter service. The rolling stock is suited to that traffic in that it maximises seating/standing space leaving little room for the safe storage of luggage. Conversely, holiday and most business travellers require rolling stock of a different configuration which makes more space available for the safe storage of luggage. When the two different forms of travelling public meet on the same train, the current service satisfies neither.
- The M23 and M25 struggle with current levels of traffic for most of the day. I find it bizarre that we are even considering expanding runway capacity at Gatwick without a substantial contribution from Gatwick towards the inevitable and considerable increase in motorway traffic volumes that this will bring.
- No mention or specific costing has been made of the redevelopment of the road networks to the west and the southwest of the enlarged airport. Specifically, will the Ifield/Charlwood Road be tunnelled under the southwest corner of the proposed airport boundary at the point it currently joins Bonnetts Lane or will it be detoured around the airport perimeter but north of the River Mole and at whose cost?
- Ifield Green/Bonnetts Lane and the Lowfield Heath Road is a well known rat-run for access to the airport, avoiding the M23, thus it's used extensively by airport staff who come from the west and southwest. Under the proposed plan, Bonnetts Lane and the Lowfield Heath Road will disappear under tons of concrete, leaving two alternatives for that traffic. Traffic can avoid Ifield Green altogether by taking Warren Drive from Ifield Parade across to Ifield Avenue and then use one of two routes (both go past a junior school) to go through Langley Green and then back onto the London Road (A23) opposite Manor Royal or at the Tushmore roundabout, thus clogging up two neighbourhoods rather than just Ifield at present. Alternatively, Ifield Green will continue to be used to access Ifield Avenue and thence northwards to Charlwood along the Ifield Road from where it will access the airport from the north via Horley Road and Povey Cross Road; this would do Charlwood no favours whatsoever. I've also heard rumours that Crawley's western relief road is again under consideration which was to have run from the A264 west of Broadfield/Bewbush to join Ifield Avenue at the Bonnetts Lane junction, skirting round the north west of Bewbush, Ifield West and Ifield. If this were to be the case, it would certainly relieve through-traffic in Ifield and Langley Green, but it would complete the development circle around the Ifield Village Conservation Area, stranding it as a rural island in an urban area.

Conclusion: A document from the Gatwick Obviously initiative recently dropped through my door. Under the Heading *"You won't have to pay a penny"* I read the following:

*"If an airport wants to expand, it's only right that they foot the bill. So our new runway would be funded by us, including all necessary road and rail improvements – whereas..."*

Although they are fine words, I don't believe them because I know they are not true. Whilst Gatwick Airport has made an allowance of £10 million to help fund local highway improvements, that is not a commitment to foot the bill – it is what it says, a commitment to pay just £10 million towards local highway improvements. No mention has been made of any additional funding for rail or motorway improvements nor indeed have I seen any mention of the total costs for local highway



improvements, which I suspect will be between £30-50 million. Fine words from an untrustworthy neighbour...

**Value:** I'm in no doubt that our property is already blighted – to what extent its value has dropped I do not know, but it will be substantial. If Gatwick's proposals for a second runway are not accepted, the value of our property will return to its pre-blight level. If Gatwick's proposals for a second runway are accepted it would be reasonable for me to expect to be compensated fairly for our loss. After all, there will be many people who will profit immensely from such a decision, not the least of whom are the shareholders and associates of Global Infrastructure Holdings who have owned the airport since 2009.

So what are the compensation arrangements?

1. For those properties closest to the proposed second runway which will experience noise levels of 66dB and greater, the Home Owners Support Scheme is offering the occupants the right to insist that their property is purchased by Gatwick Airport at its un-blighted market value. This is fair...
2. For those properties above the 57dB contour but less than the 66dB contour and are deemed to be eligible, Gatwick Airport's offer is limited to an annual contribution towards their Council Tax payment of £1,000 and a grant of up to £3,000 towards soundproofing measures for the property. From what I have read I also presume that the Council Tax payment is restricted to the existing owner and doesn't transfer to a new owner on the sale of the property. This would be unjust as it would serve to reduce the resale value of the property in the future, thus continuing the blight. Although heralded by Gatwick Airport as them fulfilling their obligations as a "good neighbour", this whole scheme is generally unfair...

Conclusion: Our property falls just over 200 metres short of the 66dB contour, so we will only be compensated, as per 2 above, ie at a minimum level. The council tax contribution and grant may well be adequate for a reasonably modern dwelling some 15kms to the east or west of Gatwick which lies just within the 57dB noise contour, but is totally inadequate when matched against the needs of a Grade 2 Listed Building just 750 metres from the runway. The Tweed was built nearly 350 years ago, well before the invention of trains, cars and planes, so is not at all good at preventing the intrusion of modern noise levels. As it stands at present we will suffer:

- a) the loss in our property value caused exclusively by the development of Gatwick's second runway. This will not be mitigated by the Council Tax contribution as I believe this is not transferable to a new owner;
- b) the costs of providing a reasonable level of soundproofing to the dwelling, less of course the £3,000 grant. As already indicated from the advice of the Listed Property Owners Club, we are likely to spend £3,000 on just the costs associated with assessing our needs and gaining the necessary Listed Building Consent.

I therefore challenge the equitability of such a broad-brush approach which smacks of a clinical commercial attitude rather than a desire for fairness. A more even-handed approach would be to assess compensation on a sliding scale across the 57-66dB range, taking into account the specific requirements of all properties that have special and particular needs. The result of this approach would be a package along similar lines to that already proposed, but the amounts should be increased to cover, more fully for those who live closest to the airport, the entire cost of soundproofing. The Council Tax contribution should stay with the property irrespective of the owner and, as a sanity check, full compensation for sound-proofing should be no more than the difference between the blighted and un-blighted property values.

**Q2:** Do you have any suggestions for how the short-listed options could be improved, i.e. their benefits enhanced or negative impacts mitigated?

This has been covered in my answer to Question 1.

**Q3:** Do you have any comments on how the Commission has carried out its appraisal?

I have the over-riding feeling that the task is so enormous that some of Gatwick's assumptions and statements haven't been adequately challenged and that certain crucial issues may have been overlooked. I hope that the level of detail that I have been able to provide has helped to overcome this problem in some small way.

**Q4:** In your view, are there any relevant factors that have not been fully addressed by the Commission to date?

As already covered in my answer to Question 1, I believe that:

- the compensation levels under offer to those in the 57-66dB noise contour band who will be most disadvantaged by the development of a second runway at Gatwick do not adequately reflect the extent of personal loss they will suffer. This is basically unfair;
- the predicted noise contours submitted by Gatwick Airport need to be validated or otherwise through a full and independent review as I believe them to be understated by a factor of up to 20%. This conflict must be resolved before any final recommendation is made to the Government.
- the Airports Commission should undertake its own dispersion modelling in order to either validate or challenge Gatwick Airport's assertion that existing EU limits on air quality will not be compromised in the northern neighbourhoods of Crawley.

**Q5:** Do you have any comments on how the Commission has carried out its appraisal of specific topics (as defined by the Commission's 16 appraisal modules), including methodology and results?

I have no comment.

**Q6:** Do you have any comments on the Commission's sustainability assessments, including methodology and results?

In my response to Question 1 I have expressed my concerns about the shortcomings in the existing surface transport facilities and questioned why the necessary improvements for the inward migration of a greater number of staff is not to the full cost of Gatwick Airport. I repeat my conclusion:

A document from the Gatwick Obviously initiative recently dropped through my door. Under the Heading *"You won't have to pay a penny"* I read the following:

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**Q7:** Do you have any comments on the Commission's business cases, including methodology and results?

I have no comment.

**Q8:** Do you have any other comments?

I have no further comments.