

Sir Howard Davies
The Airports Commission
By email: airports.consultation@systra.com

3 February 2015

Dear Sir Howard

Airports Commission Consultation

I am writing on behalf of Mole Valley District Council. We are a largely rural district abutting the north western boundary of Gatwick Airport, and are less than 20 miles to the south east of Heathrow Airport. We therefore have an interest in all three shortlisted schemes.

As a Council we appreciate there is growing demand for more flights, and we recognise the economic benefits that airport expansion can bring. It would, however, also bring further noise and air pollution, intensify transport congestion and increase housing demand in an area of the country which is already overburdened by these pressures. An added dimension is that while the economic benefits of expansion would be relatively widely felt, the adverse effects would be concentrated in a much smaller area, around whichever airport is chosen. These and other considerations have led us to reach different conclusions on Gatwick compared to the Heathrow schemes. For ease of reference, I set out our views under the consultation questions:

1. What conclusions, if any, do you draw in respect of the three short-listed options?

At Gatwick, the adverse impacts arising from a second runway impact particularly hard on Mole Valley, with noise (airport and flight paths), road congestion, and housing pressure all significantly increased. These impacts are proportionately more disturbing because of the relatively quiet rural nature of the surrounding area. Gatwick would be less resilient to interruptions in strategic surface access than Heathrow, as experience has shown that when the M23 or Brighton mainline services are halted, the local road network is incapable of handling the consequent disruption. Weighed against that, the economic benefits to the District are relatively limited.

At Heathrow, the impact of either a third runway or an extended runway scheme on the District would be smaller. The economic benefit would likewise be small but positive, particularly if catalytic effects extend to locations such as Leatherhead. Heathrow is in a more accessible

location to the majority of the UK population, and its expansion would therefore be beneficial to more people than expansion at Gatwick.

As a consequence, we:

- Oppose a second runway at Gatwick
- Raise no objection to a north west runway or extended runway at Heathrow

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

In the event that Gatwick is chosen for a second runway, the scheme promoter has put forward a package of measures to alleviate some of the adverse impacts¹. This package is a good starting point, but in the light of the Commission's assessment we believe it should go further. In addition to the pledges already made, we consider that:

- Contribution to essential community infrastructure – should be doubled to £90million to reflect the higher housing forecast in the Commission's assessment
- Jobs and apprenticeships – should be increased to 5,000 new apprenticeships for local young people to reflect the higher employment forecasts in the Commission's assessment
- Council tax initiative – support compensation for houses significantly affected by noise, but that compensation be offered to households within the 54dBL_{Aeq,16h} to acknowledge the more disturbing effect of aircraft noise in rural areas
- Noise insulation scheme – support noise insulation scheme, but that insulation should be offered to households within the 54dBL_{Aeq,16h}, to acknowledge the more disturbing effect of aircraft noise in rural areas
- Local highway development fund – should be increased to £30million to acknowledge likely impacts on the local road network and the need for more extensive improvements
- Flood resilience programme – should include an undertaking to fully fund all flood defence works identified in the Commission's flood study

We believe that the majority of new employees would have to be housed close to the airport. It is vital to identify and secure adequate infrastructure to meet the needs of the growing population. Airport-related growth and background growth are inextricably linked and we recognise that public funding will be required in addition to the community infrastructure fund proposed by the airport operator to meet wider strategic infrastructure needs. Based on our own and neighbouring authorities' assumptions about likely population growth, we consider that the following infrastructure will be needed as a minimum:

- Improvement of North Downs railway line including electrification, improved accessibility to stations, particularly Dorking Deepdene, and longer trains
- Arun Valley railway line improvement
- improvements

M25 junction 9

¹ Gatwick Airport Ltd, 'Our pledges for the local community', July 2014

- Improvements to the A24 corridor including dualling and junction improvements
- Improvements to the A217 corridor including Reigate level crossing replacement
- A23/M23 (Hooley) interchange
- A22/A264 Felbridge capacity improvements
- New acute hospital to serve Gatwick area
- Western relief road for Crawley
- New secondary school in Horsham/Crawley area
- Capacity improvements to utilities (water and waste)

Were the Commission to recommend a second runway at Gatwick, it should require the Government to set out a clear framework for funding and delivery of these and other infrastructure requirements as part of a comprehensive plan to accommodate growth around Gatwick. Further details of infrastructure requirements can be provided if that would be of help to the Commission.

Were the Commission to recommend a new runway at Heathrow, a similar exercise should be undertaken to ensure that adequate infrastructure is provided to support the growth in population, including acute medical facilities.

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

We believe that all key issues have been identified, but some appraisals need further study (see response to questions 4 and 5).

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

For all three schemes, the issue that is of concern to the greatest number of local people is that of road and rail congestion. The almost daily experience of those who live and work in the area is one of overcrowding during peak periods on both mainline railways and motorways, and high flows during other times. The lack of capacity leads to poor resilience, with even small interruptions in movement causing persistent backlogs, and overloading local road networks.

Whichever airport is chosen for expansion, it is essential that adequate transport infrastructure is provided to meet both airport and background demand. Your analysis shows that committed and planned schemes will not achieve that requirement. We do not accept that because airport trips only form a small proportion of the total, continued congestion is acceptable. Expansion at either airport would generate a measurable increase in trips on to already overloaded networks. Furthermore, we believe the Commission's figures underestimate trip generation, because the model does not cater for catalytic growth, or changing effects of in-commuting. Airport expansion should be used as an opportunity to address current infrastructure deficits and fully meet future demand.

Meeting growth in demand will require further capacity enhancements beyond those listed in your extended baseline. We appreciate that such improvements will be challenging and potentially expensive to implement, but are a necessary pre-requisite if airport expansion is to gain public support. The improvements should be provided in a timely manner, ahead or at the same time as forecast growth, and should include measures to increase resilience.

5. *Do you have any comment on how the Commission has carried out its appraisal of specific topics including methodology and result?*

We question the methodology used for the Commission's work on housing growth and distribution. In the assessment, housing growth is assumed to take place between 2020-2030, when at Gatwick expansion of employment is forecast to take place over a longer period (up to 2050). This discrepancy appears to overestimate the annual housing requirement in the early period, and underestimate it later.

More importantly, the assumption that the distribution of housing demand will be uniform across the study area is unrealistic, and significantly underestimates the impact of housing demand on areas closest to the airport. A large proportion of direct employees at Gatwick live close to the airport, particularly those in lower paid occupations. If additional housing demand were proportional to the current distribution of direct employees, which would seem a more realistic assumption, then some neighbouring authorities – Crawley in particular – would have much higher housing demand that could not be met within their administrative areas. Demand for housing would therefore have to be accommodated in other administrative areas, with consequences for transport and infrastructure.

The alternative scenario if land for new housing around Gatwick remains constrained is that a large part of the workforce would have to commute greater distances. This would have a consequent greater demand on the transport network, which has not been included in the transport forecast assumptions.

Either way, the methodology used for housing growth and distribution does not given a realistic picture of the impact that a second runway at Gatwick would have on the surrounding area. This should be corrected before the Commission reaches a conclusion on the evidence before it.

6. *Do you have any comments on the Commission's sustainability assessments?*

See response to question 5.

7. *Do you have any comments on the Commission's business cases?*

No comment.

8. *Do you have any other comments?*

I trust that you will take these views into account when making your recommendation to Government. Please listen to the very real concerns that local people have about the impact of airport expansion.

Yours sincerely

