



Copthorne Village Association

Preserving our Heritage for Future Generations

www.facebook.com/copthornevillageassociation

Email: info@copthornevillage.org www.copthornevillage.org

28 January 2015

By email: airports.consultation@systra.com

Airports Commission Consultation
Freepost RTKX-USUC-CXA
PO Box 1492
Woking
GU22 2QR

Dear Sirs

[Response to the Open Consultation: Increasing the UK's long-term aviation capacity](#)

We are writing with our objections to the Gatwick Second Runway proposal on behalf of our membership.

Copthorne lies to the south-east of Gatwick; it has about 2,000 existing residences (population c. 5,200). In the very near future this is set to increase significantly:

- planning permission has been given to St Modwen for 500 more residences and a new school adjacent to J10 M23;
- Wates are applying for permission to build a further 46 new homes;
- two more applications for a further 270 houses have just been submitted.

Therefore Copthorne's population is likely to be about 7,000, making it one of the largest villages in West Sussex.

As the crow flies, the 2nd runway would be less than 3km to the west of Copthorne and 1km closer than the existing runway. The indicative easterly flight path would be directly overhead and following along Copthorne Bank. The altitude of aircraft over Copthorne is likely to be between 1,500 and 2,500 feet.

The Copthorne Village Association (CVA) was formed in 2000. It is a campaigning voice and information conduit for a majority of our village households.

The Airports Commission Consultation process asks for responses to a number of set points, which we answer below. Fundamentally, we believe that the whole airports expansion debate needs to be reassessed – how can the UK be looking at these limited proposals when there is so much under-utilised existing airport capacity? How can this investment be justified when money is so severely needed to fund local health services, A & E departments, police and counter-terrorism, not to mention services even as basic as maintaining our existing roads, where pot holes across the country and congestion in most parts of the South East are reaching intolerable levels?

The Liberal Democratic party passed a resolution at their 2012 Conference opposing any new runways in the South East, and this was confirmed at their 2014 conference where an amendment to permit a new runway at Gatwick was overwhelmingly defeated; Crawley Borough Council and several county councils in areas surrounding Gatwick have either publicly withdrawn their support for the Gatwick Second Runway proposal or are being urged by their constituents to do so. It is undemocratic in the face of such opposition for there to be no formal means in the consultation process to express the strength of opposition to all three options.

We also feel strongly that the consultation process has not properly engaged with the communities most affected and Copthorne - which is arguably the village to the east most affected - has been ignored.

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

There is a virtually unanimous body of opinion amongst our membership that is opposed to the Gatwick Second Runway expansion proposal.

In summary we believe that a second runway would:

- adversely affect the health of our residents from the direct noise and air pollution caused by an airport 1km nearer to the village and whose easterly flight paths would take aircraft directly overhead; add to this the additional noise and air pollution from the increased surface traffic;
- place an intolerable pressure on infrastructure (roads, schools, health services), with these services already over-stretched
- destroy forever the tranquil and rural nature of our village and the wider county and have a hugely detrimental effect on its many heritage and natural assets.
- place a huge strain on the local economy with the airport likely to attract employment away from local businesses.
- blight our properties, with inadequate compensation proposals.

We believe that the Gatwick proposal has grossly under-estimated the infrastructure investment and although Gatwick Airport Limited say that it would fund some of this, its contribution would be a small fraction of the requirement, leaving county councils, the Highways Agency and Network Rail to fund the investment needed.

The capacity for the area to provide the workers has likewise been underestimated, given that there is near full employment in the area; the influx in workers would place added burden on infrastructure and an already overstretched supply of affordable housing. These factors taken together mean that the economic benefits have been overstated.

Furthermore, with the existing runway at Gatwick able to manage almost 50% more capacity and the size and passenger capacity of planes increasing, Gatwick, without expansion, has the ability to significantly increase its operation in a way that would allow existing flight paths to be maintained, and allow infrastructure and social improvements to keep pace with the change without damaging the area irreparably.

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

General points:

The case for Gatwick is weak. The economic benefits are overstated and the negative impacts underestimated. There are too many uncertainties in the assumptions and present assessment.

The Airports Commission is strongly urged to require a reassessment of the benefits of the Gatwick option, especially to carefully assess where the demand for the extra capacity would come from, given that the major airlines have stated that they do not want Gatwick and that low cost airlines do not want higher airport charges when there are ready, lower cost, options elsewhere, such as at Stanstead. The benefits case needs to clearly state the effect of these demand factors along with the considerable uncertainty around the wider UK and global economies and how the possible scenarios would impact any potential expansion decision.

Similarly we strongly urge the Airports Commission to require a thorough costed assessment of:

1. The Infrastructure investment needed both in relation to surface transport options, given how overstretched they are at present and that planned future investment is intended to address these and not to deal with the additional burden that airport expansion would bring, including bringing forward significantly the need for improvement investment. Please ensure that your assessment addresses exactly who would fund this investment.
2. The employment impacts, including the catalytic effects. Given near full employment in the Gatwick area without expansion, the growth in jobs would not be met locally or to the extent that it does. It would increase competition for staff for local employers, driving up business costs. The scale of new jobs that potential expansion would bring means that workers would have to be drawn into the area, resulting in increased demand for surface transport and/or the need for homes to house them. Economic risk locally would increase with such heavy reliance on one very dominant employer (Gatwick) and any downside risk with the airport would have an amplified impact on local economy.
3. The associated social infrastructure needs. Tied closely to two points above, the impact of new jobs on the local economy needs to be fully costed. Exactly where associated housing would be situated given the environmental and infrastructure constraints needs to be fully assessed, along with the impacts on schools, hospitals, utilities and other social requirements.
4. The assessments of noise and air pollution impacts need to be properly considered. It is a serious concern that the Commission has yet to complete its work on air quality. The Commission needs to fully assess the impact on schools, hospitals and other community establishments. It is also clearly inadequate that flight paths and noise contour maps are “indicative” or “average based”. We believe that the negative impacts can only be properly assessed with information that more precisely identifies where the impacts would be and that any recommendation that does not properly assess these critical factors would be flawed.
5. The full cost implications of property and businesses blighted needs to be quantified. Gatwick expansion would take away more than 25% of the important Manor Royal trading estate at Crawley. Precisely how would it affect businesses impacted needs to be assessed.
6. The environmental impacts on national assets such as the Ashdown Forest and High Weald Area of Outstanding Natural Beauty need to be fully assessed and we need to be assured that these assets would be properly protected for ours and future generations.

Copthorne-specific points:

7. Copthorne residents are presently impacted by air pollution and airport noise including from night flights. They have been particularly affected by the recent new concentrated flight path trials; a second runway 1km closer and flight paths above the village would make this considerably worse and the closer proximity that the enlarged airport would bring to the village means that residents would be affected by all aircraft movements whether landing, taking off or taxiing. The noise and air pollution from increased surface transport would compound these issues.

8. The roads around the village are already congested. The adjoining main road (the A264) is at a virtual standstill at rush hours, with the Copthorne Hotel roundabout at 138% of capacity. The A264/M23 Junction 10 cannot be improved further and traffic exiting at J10 currently queues on the M23 northbound in the morning rush hour, and queues southbound on the M23 in the evening rush hour. Even without the airport expansion the problem is only going to worsen with planning permission granted recently in Copthorne for 500 new homes, whose sole access is via the Copthorne Way link road. The second runway plans would restrict access to the Manor Royal industrial estate. The area's road network would require significant upgrade and the additional Gatwick traffic needs to be fully factored in, with a clear commitment on how the work would be funded.
9. The rail system is equally overstretched. The Brighton-London line is one of the most congested in the country. For residents commuting by train getting to the local Three Bridges station, although only 2 miles away, is a challenge with inadequate public transport, no cycle lanes and inadequate parking. When they get to the station the trains into and out of London are full and most endure commuting in very cramped conditions as a matter of course.

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

With limited resources it has not been possible to review the 10,000 pages of research but we have been impressed by our direct contact with Commission staff and their willingness to engage with those concerned members of the public who have made the effort to approach the Commission.

However, as stated in our opening remarks we feel strongly that the consultation process has not properly engaged with the communities most affected and Copthorne, which is arguably the village to the east most affected, has been ignored.

We understand that Gatwick Airport Limited has much to gain by promoting the Second Runway proposal, but there should be some better control over how it is able to spend millions of pounds advertising the benefits whilst not addressing concerns.

Clear, unbiased information, communicated in simple to understand ways to help all those likely to be impacted, should have been provided to run alongside an open and transparent consultation process.

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

Fundamentally why has the Commission not assessed the cost-benefit of better using existing airport capacity in the UK?

The problem at Gatwick with night flights seems to be recognised but without any proper conclusion as to how this issue would be factored into the Commission's recommendation.

It is unacceptable that the fundamental issues of environmental impacts and infrastructure investment needs have not been fully assessed. The Business Case should not be allowed to proceed without first fully addressing these issues.

Q5 Do you wish to comment on how the Commission has appraised specific topics (as defined by the Commission's 16 appraisal modules), including methodology and results?

We note the framework approach being taken by the Commission and the particular aims of each of the 16 appraisal modules. Our comments already cover many of these topics but in summary:

Strategic fit:

- The Gatwick Airport model is low cost airline centred and the second runway proposal would increase airport charges. Low cost airlines would move their operations elsewhere.
- Gatwick is not wanted by major airlines and nor can it provide a hub solution.
- More generally, the assumptions about growth in aviation demand are far from certain.

Economy impacts

- We challenge how these “south centric” proposals align with policy to regenerate other parts of the country.
- The cost to support infrastructure investment, which would have to be met by local authorities, the Highways Agency and by Network Rail, need to be fully costed and included in the Business Case.

Local economy impacts

- With virtually full employment in the area, the expansion in low grade jobs would have to be met by incomers to the area, putting added pressure on housing and social infrastructure needs.
- Associated with the above, full employment and increased demand is likely to increase employment pressures on local businesses.
- There would be a loss of at least a quarter of the important Manor Royal industrial estate at Crawley with no certainty about where the impacted businesses and the associated jobs would go.

Surface access

- The Gatwick second runway proposals only address the immediate surface access issues. They focus on the major trunk routes north of the airport, and assume that the already planned improvements would be the solution. These are already hugely overstretched and the investment upgrades are needed irrespective of a second runway.
- The road and rail east-west travel factors are inadequate, as are the impacts where the trunk routes meet the rest of the travel network. For example, M23 road improvements to the north of the airport may ease issues there but this only shifts the problem onto the M25 (no sane person would regard this as a solution) or adds congestion to roads that then feed into southern parts of London.

Noise

- Copthorne would be extremely adversely affected by a huge increase in noise. The new runway would be closer than the existing and it is planned that both runways would be used together. Thus the noise produced would be doubled and it would be closer to the village. Furthermore, the indicative flightpath is directly over Copthorne, this would increase noise and mean that some residents would be living between two flightpaths.
- Noise in semi-rural areas is recognised as having a much greater impact than in urban areas. Those impacted around Gatwick live in semi-rural areas and we ask that the Commission takes proper account of these relative impacts when concluding its assessment of noise impacts.
- The noise that Copthorne would experience would be intolerable for most residents. It would not be possible to enjoy any outdoor activity. It would not be possible to sleep with windows open. Gatwick has talked about compensating local residents for noise but there can be no compensation for a level of noise that would destroy normal life and create many health problems.

Air quality

- We understand that most areas around Gatwick are at present within EU Air Quality standards, and it some assurance to know this, but it does not sit well with the experience for those who live in Copthorne and know that they can often smell the distinctive airport pollution and can see the impacts of air pollution on their property and the chemical film that covers open water, such as garden ponds. The doubling of aircraft using Gatwick, together with the resulting increase in surface transport in the area, would only worsen this. We ask the Commission to ensure that the evidence of air quality measurement is independently expert assessed along with the same independent assessment on the way that air quality would be impacted with a second runway.

Biodiversity

- A most obvious concern is for protection of the national assets of the Ashdown Forest and the High Weald Area of Outstanding Natural Beauty. The Commission needs to be satisfied with clear evidence as to how the biodiversity within these national treasures is not threatened by environmental impacts associated with expansion due to the second runway proposal.

Carbon

- We join environmental groups such as the RSPB and WWF in challenging the conclusion that the Gatwick second runway proposal would be compatible with the Climate Change Act and ask the Commission for full expert assessment of the impacts.

Water and flood risk

- We saw flooding last year in the area and at one point Copthorne almost became an island due to flooded roads and adjoining countryside. We are concerned that the problems would only worsen by the loss of drainage caused by the land taken and concreted over for a second runway and all the associated building generated by this expansion.
- The area has experienced water shortages and rationing during summer months as recently as 2011. Copthorne is already concerned that the additional planned new homes would make this a more common problem and the issue is likely to be more frequent and wide spread with even more homes drawing on the same water supplies.

Place

- The destruction of listed buildings, the adverse impacts on the Ifield Conservation area, together with the urbanisation of the wider county and surrounding areas would change the character of this part of the South East forever. Suggestions about moving some of the most important buildings (if serious and realistically costed) may be a partial solution but the full national value of these historic buildings are in large part due to the areas in which they are situated, which would not be replicated. We understand that the Gatwick proposal has a much larger impact on such national assets than the other options, and ask the Commission to take proper consideration of the unquantifiable price that the loss of such assets would have.

Quality of life

- People choose to live and bring up their families in Copthorne and surrounding areas because they are attracted by the semi-rural nature of these communities. The urbanisation and increased traffic congestion would change this way of life for the worse. The increase in the level of aircraft noise would totally destroy village life. All outdoor activities would be affected. The village sports fields would lie between two flightpaths and not be usable. The schools would be seriously affected and Copthorne would be no place to bring up a family.

Community

- Copthorne, in common with many areas nearby, is seeing a stretch on local services such as schools, doctors' surgeries, hospital services and other community facilities as the pace of population growth outpaces the ability to invest in these services. That pressure would grow with more incomers attracted into the area through jobs directly associated with the second runway and the indirect 'catalytic' jobs. We ask that the Commission carefully considers how the Business Case assumes these services would be met and paid for.

Cost and commercial viability

- We are concerned that the Business Case under-estimates the full cost impact of the Second Runway proposal, and failure to cover these costs would be left as a significant demand on the public purse.
- We are also concerned that many of the promises made by Gatwick Airport Limited may be difficult to enforce if, as is the operator's stated intention, they sell the airport. A new operator, unless legally bound, may decide that some of the promises are too expensive to deliver.

Operational efficiency

- Part of the attraction of airports such as Gatwick is the ease with which passengers can access the service. This is particularly so for the short-haul passenger. Growth and over-crowded transport infrastructure would undermine this attraction.
- Delivery of the Second Runway expansion in phases is likely to worsen the customer experience of passengers.
- Taken together these factors may drive the low cost operators to look elsewhere, further threatening the volume assumptions and argument for the Second Runway.

Operational risk

- Our key concern is around the resilience of the Second Runway expansion proposal given the fragile nature of the local infrastructure. Both the road and rail transportation systems have significant points of weakness. Both are one dimensional – road would place heavy reliance on the M23 and rail on the London to Brighton line; failures in either would leave airport passengers and airport workers stranded.
- Road upgrade plans may address some of these issues immediately around the airport but the M23 connects for the majority with the M25 to provide east-west travel options, and it is stating the obvious to note how regularly problematic this motorway is, even with improved traffic management.
- Similarly rail upgrades may allow for passengers to move in the airport but would be constrained by the East Croydon pinch-point.

Delivery

- We note that successful delivery would turn on how well the airport engages with local communities. Our experience in Copthorne has not been positive. Gatwick Airport Limited has done virtually nothing to engage with our community, which it must recognise as the most affected village east of the airport. We have seen and been unimpressed by the thin, yet very expensive communication, that did nothing to discuss or reassure us about concerns that are obvious.

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

See our response to Q8 below.

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

See our response to Q8 below.

Q8 Do you have any other comments?

We are pleased to have the opportunity to have our views considered as part of this process but need to record our concerns about how difficult it is for the average member of the public and small organisations such as ours to review and intelligently comment on the volume of quite technical data on offer.

The availability of an easy to find online resource that brings together the issues and arguments would have been very welcomed, and we suspect that the absence of this would mean many impacted would be unaware and not respond, giving the wrong conclusion that their silence means broad support.

Where groups such as ours have been able to engage with their communities the strength of feeling against the Gatwick Second Runway proposal has been virtually unanimous.

We strongly object to a second runway at Gatwick Airport.

Yours faithfully

[Redacted signature]

On behalf of the Copthorne Village Association

[Redacted signature]

[Redacted signature]

[Redacted signature]

[Redacted signature]

[Redacted signature]