



EAST GRINSTEAD TOWN COUNCIL

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INVESTOR IN PEOPLE

Your Ref:

My Ref:

2nd February 2015

Sir Howard Davies
Airport Commission
By email to: airports.consultation@systra.com

Dear Sir Howard

East Grinstead Town Council is pleased to have an opportunity to respond to the Commission's option paper (attached).

It is noted that The Commission has not asked respondents whether or not they agree that an additional runway is needed. Nor has it asked if respondents have a preference as to where additional airport capacity should be provided. The Commission wishes to:

- test the evidence base it has assembled;
- understand stakeholders' views as to the accuracy, relevance and breadth of the assessments it has undertaken; and
- Seek views on the potential conclusions that might be drawn from them.

This Council has read the commission's documents (which are extensive on this issue) and finds that grave reservations as to the impact on the existing environment and community of a 2 runway airport at Gatwick have not been mitigated. Further investigation, satisfaction of results and a commitment to ensure that the appropriate mitigation factors would all be put in place, is essential before any decision is made as to development at Gatwick. At this stage it would appear to this Council that the commission have; underestimated the potential negative impact on a beautiful natural mostly rural area, underestimated the costs needed to bring this option to Gatwick in local infrastructure, and over-estimated the economic benefits. The East Grinstead Town Council would oppose the Gatwick Option being pursued.

Yours sincerely

[Redacted signature block]

East Grinstead Town Council response to Airports Commission consultation concerning the 3 options for expansion of airports in South East of England including Gatwick Airport

Introduction

East Grinstead is an historic town in West Sussex situated approximately 12 miles from Gatwick Airport to the East. The town's 28,500 population, are affected by easterly arrivals and departures, prompting complaints year round as to noise disturbance. Many residents work at Gatwick or associated airlines therefore relying on the airport for their livelihood. East Grinstead is surrounded by areas of outstanding beauty in both the North Downs of Surrey to the north and the High Weald to the east and south. We are an area that benefits from tourism for both this rich natural beauty and historic attractions dating from the 1600's. Recently the restored Bluebell steam railway has opened a branch line to East Grinstead bringing more visitors to the town.

Infrastructure is wanting and the heavily used network of A, B and unclassified roads are often shortcuts for those travelling to Gatwick from East Sussex and Kent adding to commuter congestion. The Rail network is a northwards line to London with no direct links to the east of Gatwick despite the international station at Ashford and significant population in the garden of England.

We trust that our comments will be helpful to the commission to set out the position of this Town Council concerning the options under consideration. Our response is not strictly answering the questions in the consultation document but is centred around the suitability of Gatwick for expansion, based on local knowledge, raising our own questions and concerns for the Commission to consider. This response, focusing on the Gatwick proposal should not be interpreted as support or otherwise for the other options being considered by the commission.

1. Aviation Demand /National and Local Economy

The Commission view the Gatwick option will provide sufficient capacity to meet its need by 2030.

The assessment illustrates the uncertainty surrounding the way the aviation sector and the global economy, will grow and change over the coming years and while the assessment shows that Gatwick has the potential to deliver substantial benefits in terms of the UK's overall connectivity, the scale and nature of that growth varies significantly depending on the scenario. Whilst there is a similar analysis for Heathrow, the variations are somewhat smaller, reflecting perhaps the established status of Heathrow and its perceived potential to offer capacity for both low cost and network carriers.

At a national level, the scale of the benefits deriving from a new runway at Gatwick are assessed to be significantly less than those which might accrue from the Heathrow options. The methodology which has resulted in these conclusions is likely to be the subject of considerable scrutiny by the promoters of the schemes and by regional and national organisations. For the purposes of a local response, however, the results have been noted but not examined in detail.

The different scenarios used by the Commission, create a wide range of possible employment generation figures, by 2050. The forecasts range from: Employment would fall if there was no second runway, to an additional 7,900 to 32,600 extra jobs with the runway. Including the wider catalytic effects of a second runway at Gatwick (jobs created because of the opportunities that access to an expanded airport bring); the Commission suggests that a total of 49,600 new jobs could be created by 2050. The potential for economic activity generally to be attracted to the area around the Airport itself is recognised but how far this develops into extensive clustering of businesses is, the Commission suggests 'difficult to anticipate'.

East Grinstead Town Council Response

1. This Council welcomes opportunities for sustainable economic growth; however, the Council notes that the increased jobs for an expanded Gatwick airport are anticipated to remain relatively low-skilled. The Commission needs to appreciate that surrounding towns have very low levels of unemployment and the skills profile is high yet the expectation for the created jobs is relatively low-skilled.
2. The creation of high skilled jobs could reduce existing out-commuting, if residents that currently commute out of the area take up jobs at the airport, but this is unlikely to happen with lower skilled and lower paid jobs being available.
3. If the development of Gatwick results in an increase in the amount of long haul travel, then this could result in higher levels of employment and housing than suggested. The Council has concerns about the overall impact such growth could have on the character of the area.
4. The methodology behind the Commissions employment forecast is not clear. We would welcome the methodology which was used to determine these figures being clarified to allow independent testing.
5. The proposal by GAL to commit to funding 2,500 new apprenticeships is welcome, but further details of this scheme will be needed to ensure that it benefits local residents, particularly young people entering the job market. Due to the poor connectivity in local transport the younger (less mobile) residents of East Grinstead may find that these apprenticeships are not available to them and therefore additional early morning and late night bus services would need considering to create equal opportunity to those not on the Gatwick Main line.
6. The Commission's assumption that provision of premises to meet new employment needs would not be an issue within the wider area is concerning. The Commission has not appreciated the severe environmental and infrastructure constraints of the area in accommodating additional development. It is feared that the Commission has over-estimated the capacity of the area to accommodate employment space over and above that needed within current plans.
7. ***The Commission is therefore asked to note that, due to the relatively low skilled nature of the additional jobs to be created, the expanded airport may have limited economic benefits to the surrounding communities.***

2. Development of Housing and Social Infrastructure

The Commission estimates that a new runway would generate a need for between 0 and 18,400 additional households, of which 13,500 would be generated by the 'direct'

employment needs of the airport. It identifies a number of reasons why the amount of housing is unlikely to need to match this figure (including issues relating to population growth, net migration, unemployment and commuting) but does not explore these in detail. The Commission notes that new housing and households would need to be supported by additional social infrastructure; its assessment indicates the need for additional form entries in local schools and two additional GPs per authority.

East Grinstead Town Council Response

1. Major growth at Gatwick will add pressure onto the housing market and the scale of new housing provision is a significant issue. The Commission needs to appreciate the severe environmental and infrastructure constraints of the area. This means it is already very challenging to plan in a sustainable way to meet existing projected needs.
2. The Parish has a rich network of ecological and historic assets. The area is rural in nature, tranquil and those living within it enjoy a high quality of life (Mid Sussex District being 17th out of 405 authority areas in the Halifax Quality of Life survey 2014). It is wholly within the European SPA of the Ashdown Forest and boasts historical sites of interest (including a Tudor high street and Elizabethan alms house). It benefits from being a tourist destination for day trips and longer stays. It is extremely important that the Commission takes into careful account the impact of developing a huge airport, bigger than the existing Heathrow, in the middle of the Sussex and Surrey countryside. This Council believes the impact would be to change the nature of this historic and beautiful area irreparably. GAL should provide for, and fund, compensatory mitigation for direct habitat loss and its on-going management. This should include reinstating woodland and hedgerows, and adequately making up for the loss of ancient woodland.
3. The in-migration of lower-skilled workers to fill the newly generated jobs has implications for the provision of affordable/ subsidised housing as well as the impact on health services, education services and benefit support. If the additional homes generated by the airport expansion are predominantly for low-skilled workers they are unlikely to be able to afford open-market homes to rent or buy. Social housing is already over-subscribed in the Mid Sussex District with many East Grinstead residents claiming there is no opportunity to remain in the town they grew up in due to the lack of available affordable homes.
4. East Grinstead already experiences a significant infrastructure deficit. The current planned levels of growth up to 2031 for the whole of the Mid Sussex District has estimated infrastructure needs of £138 million, of which only £19 million is currently committed or can be reasonably anticipated under s106 developer contributions.
5. The Commission must recognise the need for and cost of additional infrastructure to support additional housing generated by the expanded airport as this will affect the deliverability and cost of the scheme. Gatwick has pledged £46.5 million towards community infrastructure and £10 million towards local road improvements. However, this will not be sufficient to address strategic needs in the area, and the Commission will need to recognise that substantial Government investment will need to supplement developer funding. This Council supports the call from West Sussex County Council that a minimum of £30m should be dedicated to local road improvements to reduce bottlenecks caused by the increased traffic.

6. Some of the items which GAL has proposed also appear in the Commission's list of additional off-site improvements. It is not clear whether the cost of these improvements would be additional to the cost of expanding the Airport and therefore not be paid for by GAL, but fall on the public purse. It is imperative that the Commission ensure that all infrastructure improvements needed for the expansion of the airport are correctly identified and all costs of these are to be met by GAL.
7. The Council is also concerned that the increased infrastructure itself will add to the development pressures in the area and adversely impact on its rural character. New schools and health facilities, Improvements to roads and junctions to increase capacity can significantly change the character of settlements.
8. ***The Commission is therefore asked to review the financial level of commitment needed to infrastructure.***

3. Surface Access

The Commission has produced a baseline which sets out the transport schemes which, it considers, will be needed to accommodate background growth whether or not there is an additional runway. The Commission considers that, provided the improvements identified in its baseline are delivered, there will be sufficient rail capacity to accommodate a second runway, although further upgrades are likely to be needed in the 2040s. Planned and anticipated investment in the M23 and M25 are also considered sufficient.

East Grinstead Town Council Response

1. The Council believe that part of the increased rail capacity already planned, will be used up by expansion of the airport and the associated business and residential development. This will inevitably bring forward the point at which capacity is again reached. The Commission has already noted that the Brighton Main Line may need further upgrades in the 2040's. There is no consideration of the East/West link to Gatwick by rail and specifically headed towards Kent from the airport.
2. Road travel shows significant reliance on the North-South corridor which contains the M23/A23 and the Brighton Main Line. There is currently only limited access from that corridor to the Airport. The Commission should give more consideration to the impacts on other major links in the area and the need for their improvement, including the A264, the A22, both of which are likely to experience further pressures, in their own right and as alternatives to the M23/A23 at times when this route is congested.
3. Whilst GAL has indicated that it would provide £10 million to a local transport fund, little consideration has yet been given to the impact on local roads. Local roads to the south and east of the airport already experience heavy volumes of traffic, particularly at peak times. Rural villages experience fast moving traffic on inappropriate roads as travellers seek to avoid the congested routes, increasing traffic volumes and speeds near schools and wildlife corridors, inappropriate residential areas become "rat runs". This is likely to be exacerbated with the increased demand for access to the airport.
4. Bus/ coach Routes and timetables need to be considered to ensure that sufficient transport is available at all times to reduce the need to use the private car. GAL does

not see that congestion on the M25 will reduce transport to the airport via public transport will be essential.

5. ***The Commission should extend its analysis to consider in more detail the effects of a new runway and associated development on the local road network and measures which should be put in place to mitigate the impacts. Further discussions are needed to establish an appropriate size for any fund, who should contribute to it and how it should be distributed. It should include specific provision for addressing problems on local roads as well as at strategic junctions.***

Environment (Noise/pollution) people factors

The Commission's analysis indicates that a second runway would lead to a significant growth in the number of people affected by aviation noise in areas close to the Airport. The maps accompanying the consultation show the extension of noise contours to the south, east and west of the airport, affecting neighbourhoods on the northern side of Crawley but also communities as far as East Grinstead.

The assessment is based on the average use of the flight paths and historical average between take-offs and landings from the west and east. This will not reflect actual noise levels for each of those scenarios, or the impact on communities under a particular flight path, as areas under flight paths are not included in their study area. In particular, the noise impact on areas under the proposed easterly flight paths, which particularly affects East Grinstead residents, would be much greater than that portrayed by the Commission.

Maps showing indicative flight paths which might be associated with a two runway airport show how areas outside the formal noise contours could be affected by overflying and disturbance.

East Grinstead Town Council Response

1. The effects of noise on residents of East Grinstead are a major concern to this Council; complaints are regularly received especially during the heavier air traffic of the summer. Maps produced by the Commission show how, without a second runway, noise contours contract as aircraft generally become quieter. With a second runway, those contours expand significantly. Whilst currently, the contours have a predominantly east-west orientation, with a second runway, contours would extend south, reflecting, in particular, take-off routes.
2. The concern extends beyond the formal contours. The recent flightpath trials carried out at Gatwick have demonstrated the impacts of increased overflying on areas and communities which currently enjoy comparatively high levels of tranquillity.
3. To take greater account of the impacts of noise on areas and communities which currently experience comparatively tranquil environments and which are likely to be affected by overflying aircraft.
4. Noise from night flights is recognised by the Commission as an issue. GAL has suggested that the northern runway could be used for night flights.
5. The Commission needs to look at this issue in more detail with a view to establishing clear conclusions which can be translated into operational requirements. This town council is opposed to any increase in night flights. The long term effect of loss of sleep on schoolchildren in particular, but any age range is not known and further studies are essential to understand the effect that a second runway would have on the affected population.

6. Some mitigation of noise effects can be achieved through noise insulation and GAL is proposing to extend the noise insulation scheme to cover the costs of insulation up to £3000 for houses within the 60dB contour. GAL also proposes a council tax initiative whereby existing residents within the new 57dB contour for a second runway would receive an annual payment of £1,000 towards their council tax. Both of these compensations should fully include the East Grinstead parish as the increased disturbance will be felt throughout the town.
7. The Commission includes within its assessment consideration of the impact on people directly affected by a new runway. As part of this the Commission has undertaken a quality of life assessment which suggests that, within 5km of the airport, the overall impact of the airport would be neutral although it recognises that the impacts will vary between communities depending on the balance of positive and negative impacts.
8. It is of concern that the Commission has not yet completed its work on air quality. This is an issue for the local area both in terms of air travel and surface access. The Commission should also consider further the implications of increased traffic on the Ashdown Forest Special Area of Conservation. The Commission's quality of life assessment, whilst of interest, needs significantly more work if it is to form part of a robust appraisal. In particular it should look at the effects of changes on quality of life, as there is likely to be a significant between the views of those who move into an area and those who experience a change in their living environment.
9. ***The commission is asked to ensure that all communities are fairly and openly assessed for noise impact and that in-depth studies are carried out as well as mitigation or compensation being appropriately included in any costings.***