Ifield Village Association, Crawley, West Sussex
Response to Airports Commission's Consultation Questions
28 January 2015

What is Ifield Village Association and why are Gatwick's proposals important to us?

Ifield Village Association, meeting with councillors and council planning officers, has responsibility for maintaining the character of the Ifield Village Conservation Area (IVCA), which is one of nine conservation areas in Crawley. IVCA is in the North West of Crawley, and hence close to the proposed new runway and the proposed airport boundary (see Map 1, Appendix 1). Part of it is within your *Intermediate Study Area* and all of it is within your *Outer Study Area*[1], where the impact on place, community and heritage were assessed. Our response details serious negative impacts we predict for the Conservation Area if there were to be a second runway built at Gatwick and hence gives our reasons for opposing such a development.

The Conservation Area was so designated for:

- its historic features - its 13th Century Church (Grade I), its 17th Century purpose built Quaker Meeting House (Grade 1), its 13 grade II listed dwellings and eight locally listed buildings[2];
- its greenness and openness (it has the only designated Village Green in Crawley and has meadows with SNCI (Sites of Nature Conservation Importance) status);
- its proximity to farmed countryside, allowing circular walks into the countryside and back;
- its pattern of roads and tracks which were not affected by the building of the New Town.

Friends Meeting House, Langley Lane, IVCA

St Margaret's Church, Ifield, IVCA

Rectory Lane, Ifield, IVCA

[1] See Clause 2.67 *Gatwick Airport Second Runway: Business Case and Sustainability Assessment*
[2] See Appendix 3 for more details of listed buildings.

The Conservation Area has thriving community activities including:

- a local theatre company and Arts Centre[3],
- an Annual May Fayre which attracts large crowds from across Crawley,
- an active church community[4],
- cricket and football teams.

The area is also much used for dog walking and for country walking into the agricultural land on the west side of the River Mole and Ifield Brook. With the existing runway about 2 km from the northern edge and the planes on an 08/26 trajectory it is relatively peaceful, except for the occasional aborted landings.

Photo: View from North end of Tweed Lane across field into which the airport bund would extend. Note present position of aircraft on a westerly take-off.

More details of the conservation area can be found at www.ifieldconservationarea.org.uk

[3] See Ifield Barn Theatre and Arts Centre. www.ifieldbarn.co.uk
[4] www.stmargaretschurchifield.org

Referring now to the Airports Commission's questions:

Q1: What conclusions, if any, do you draw in respect of the three short-listed options?
If Gatwick were expanded the airport boundary would be 200 metres from the northern edge of the Conservation Area, planes will be taking off at full throttle about 650 metres away and the circular walks into the countryside will be unbearably noisy, like the current footpath that links Ifield to Charlwood. The whole of the Conservation Area will be above the 57dB level - the level deemed to cause annoyance and be subject to compensation. Half will be above the 60dB level and a third above the 63dB level (see Map 2, Appendix 2). In addition, the predicted noise contours do not, we believe, take account of the noise from ground manoeuvres and de-icing machines, so these noises must be factored in. The walks into the countryside to the west will be above 63 dB and hence will be far less used. Key features of the Conservation Area will be lost – i.e. its link to the countryside and incidentally its links to the historic civil parish of Ifield (note the names Ifield Wood, Ifield Court Hotel and Farm – on the Horsham side of the boundary).

Photo: Rural footpath to IVCA from the west. Church tower just visible above the trees.

The character of the area will also be altered by the need to reroute roads. The current rural road route into and out of the Conservation Area is via Ifield Green, onto Ifield Avenue and then Charlwood Road (Appendix 1, Map 1). This would be blocked off by the bund round the airport boundary. At present there is no indication of how the road would be rerouted (GAL's map merely shows a vague squiggly line indicating that something would have to be done.). This bund, with its high metal security fencing, would extend into the network of footpaths in the open countryside and be visible from the Conservation Area, as it stretches across the field towards Ifield Court Hotel. Such a prominent landscape feature would be out of character with the area.

There are settlements north of, but contiguous with, the Conservation Area which would be seriously affected: Strathmore, Rivermead and the Orchard, not to mention the Hindu Temple only 90 metres away. Most of them will be in the 60 dB level.

Noise apart, we are mindful of the fate of Lowfield Heath, an erstwhile village on the boundary of the present airport. We can foresee the same happening to Ifield Village and its surroundings, where warehouses, commercial premises, car parking and B & Bs replace family homes and sprawl into the countryside. The village's thriving community activities will go. We fear that existing measures that are in place to protect heritage such as conservation area legislation, listed building regulations and SNCI designation, will be overridden.

As Ifield is part of Crawley, the impact on the town as a whole will affect the Conservation Area. Crawley was built as a New Town in the 1950s. Its conception was of a town in the countryside with a population of 50,000. It was built round four existing villages: Crawley, Ifield, Three Bridges and Worth and an effort was made to preserve the character of these amidst the new build. Its population now has expanded to nearly 110,000. Crawley Borough Council's (CBC's) current Local Plan[5] makes it clear that CBC has difficulty meeting its existing housing needs, especially for affordable housing. Clause 3.21 on page 41 of the Airports Commission Consultation report states "Expansion at Gatwick has the potential to align well with the local and regional development strategies, …" This is totally wrong. The Crawley Plan which has been prepared and has gone for inspection covering the period to 2030 is consciously based on figures <u>without</u> a second runway. If there were to be a second runway the plan would have to be scrapped and a new one prepared. For more details on the effect of this refer to CBC Local Plan submission clauses 5.9 – 5.20

The CBC Local Plan also shows that with Manor Royal Business Park and Gatwick Airport within the borough boundary, there is a net influx of employees. As a result the roads into Crawley and Gatwick are congested for up to two hours at the beginnings and ends of the working day. Despite the increase in population and the commuting problems, the town still retains its character as a town in the countryside. Apart from commuting times, it is possible to drive into a relatively rural environment within 10 minutes from any point in the town. On the west side of the town, and particularly in Ifield, it is also possible to *walk* into the countryside within 5 minutes.

In our judgement it will be virtually impossible to maintain this character for Crawley if the airport were to expand because of the change in the number of jobs in the area and because of the doubling (by 2050) of the number of passengers using Gatwick.

There is great uncertainty about the increase in the number of jobs. Your own estimates vary from 500 – 23,600 by 2050 and 7,900 – 32,600 by 2060[6]. GAL is predicting much higher numbers. CBC will be challenging your figures on jobs created, believing that the number of jobs will be considerably higher than you predict. If we consider the median number of job increases to predict the future, there will be *overwhelming* pressure to enlarge existing roads or to build additional roads in order to accommodate the larger work force.

GAL (Gatwick Airport Limited) has made proposals aimed at accommodating the doubling of passengers seeking onward transport to London and other destinations. Extra commuters, however, caused by a doubling of airport-related employment represent a much larger transport problem which we believe has not been adequately addressed.

While the improvement to the railways will take some of the strain, much traffic will go to the roads. At the moment Crawley is bordered on the east by the M23, on the south by the M23 and the A264, and has the A23 running through its centre. A road round the southern

[5] CBC Local Plan submission is available on www.crawley.gov.uk
[6] Airports Commission Consultation Report, Nov 2014 Clause 3.24 Consultation Report

boundary[7] of the airport would end up as the northern boundary for Crawley. Existing roads are already busy and a western 'relief' road for Crawley would be the next step. This would in fact be no relief at all. It would cut Ifield Village Conservation Area from its setting against the open country and fields. Crawley would be trapped in a network of roads on all sides with, in addition, an international airport at its northern boundary. Crawley will undoubtedly suffer from road noise pervading the whole of the town and the countryside will be more difficult to access. A town in the countryside, which was intended originally to allow people from the cramped conditions of London to live in a less congested and a quieter environment, would be lost.

There is less uncertainty about the increase in the number of airline passengers, although you acknowledge the difficulties of predicting the future patterns of airport travel[8]. You are predicting a doubling of the number by 2050. This will certainly put additional strain on all existing terrestrial routes. It will put further pressure on the trains during commuting hours, but will possibly use spare capacity outside commuting hours.

There will be effects further afield. To the north, the North Downs act as a natural physical barrier for N/S routes. Routes across the Downs, other than the M25, which might serve Gatwick are: the A24 (through the Mole Gap); Pebble Hill from Headley Heath; A217 (Reigate Hill) , and the A23 through Merstham. These all join the A25 along the bottom of the Downs. From there, drivers can find rural routes through pretty Surrey Villages (e.g. Blackbrook, Betchworth, Brockham, Newdigate, Rusper, Norwood Hill) to the Gatwick area. These rural routes will either become rat-runs to the airport or pressure on other roads will result in dual carriageways being constructed through the countryside.

In addition the North Downs is an Area of Outstanding Natural Beauty; additional traffic and enlarged routes will reduce its value as an AONB. The land immediately south of Crawley is also an AONB. This designation should restrict the building of large dual carriageways to bring in increased traffic from the south. If it succeeds, however, the few rural routes through this area would suffer the same fate as those to the north – they would become rat-runs and the tranquillity and beauty of the area would be lost.

You have predicted an increase of about 18,400 houses as a maximum for additional workers and claim that the necessary building can be absorbed between the 14 authorities affected[9]. We do not share your optimism, given the current difficulties both Crawley and Horsham, for instance, are having to meet their existing housing needs. More rural land is likely to be taken. We also note that CBC, along with challenging your figures for jobs, is challenging your figures for the number of additional houses needed.

[7] GAL's submission is very vague on the nature of the road round the southern perimeter (there is mention of a cycle track – but little other detail.)
[8] Airports Commission Consultation Report Nov 2014, Clause 2.22 – 2.35
[9] Airports Commission Report Nov 2014, Clause 3.25

Housing will not be the only need. Workers will bring their families. We have just contacted West Sussex County Council about school places. Currently (January 2015) all primary schools in Crawley and Horsham are full for Y1, save one place in the infants school in Littlehaven, and there are few places in other years. Most secondary schools are also full. So with more houses will come the need for more schools, and more land will be required. More surgeries, dentists and hospitals will be needed along with additional water resources in an area of the country where water supply is already under stress. These all require more land. The current sewage works near Gatwick that serves Crawley is almost up to capacity – a new sewage works would be needed, requiring yet more land.

Your report identifies the need for more land than that used for the airport. At the moment your estimate is of 78ha for surface access (9ha of which is in the Green Belt)[10], but this does not include the land needed for additional houses, replacement houses, replacement and new commercial buildings, and new roads. We believe the land-take will be much in excess of your estimate.

We have mentioned the noise from road traffic, but the noise from aircraft that we identified for Ifield will be similar for much of Langley Green, Northgate, Pound Hill North and the new development at Forge Wood. We note, incidentally, that no mention of the latter has been made in the consultation report.

There seems to us to be complacency about flooding from the further development of the airport. While GAL makes claims that it can cope with it, there is nothing in your own consultation report in the section on Environment (Clauses 3.31 – 3.35) to address this problem. Our experience of winter weather is of extremely muddy fields on the Weald clay and periodic flooding of the River Mole and Ifield Brook. The photograph shows the standing water on Ifield Village Green in February 2014 and is typical of what is seen in the fields in the area including in the fields that border Bonnetts Lane, where the second runway would be built.

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

We have found it difficult to identify any benefits and we cannot see how the negative impacts can be mitigated. The offer of double glazing and loft insulation is not relevant for the majority of properties because they are already double glazed and insulated. It is also not relevant for most of the listed buildings in the Conservation Area, because of planning restrictions that do not permit alterations to window styles. Many of the listed buildings are also unsuitable for loft insulation.

The Consultation Document refers to compensation to places of public worship against the effect of noise. Such compensation is likely to be useless since both the Friends Meeting

[10] Airports Commission Report Nov 2014, Clause 3.25

House in Langley Lane and St Margaret's Church in Ifield Street are grade 1 listed buildings and insulation may not be permitted or possible. These buildings would become unusable for worship because of intrusive sound from aircraft.

The offer of £1000 pa compensation for houses above the 57dB level is considered irrelevant if not derisory. It is irrelevant because one of the key features of the Conservation Area is its outdoor spaces which, of course, cannot be insulated. This so called 'compensation' is built on false premises: first, that the only problem is noise inside buildings; second, noise intrusion can have a monetary value placed on it. GAL is failing to recognise that compensation measures cannot mitigate the destruction of tranquillity, the urbanisation of the area and the detriment to towns, villages and countryside including Areas of Outstanding Natural Beauty.

While the Airports Commission report acknowledges these negative impacts, the impression is left that they can be dealt with – but it is only an impression, with no evidence.

Q3: Do you have any comments on how the Commission has carried out its appraisal?
From our point of view the appraisal process has been fair and open. The Airports Commission has made the models it is using to make assessments as transparent as possible. It has given and is giving necessary opportunities to respond. The face to face meeting in Crawley on 16th December was helpful. The advantages of the transparency is that we can follow your thinking; the disadvantage is that the reports are not easy to assimilate and some people are daunted by them.

We have had to be fairly disciplined, however, in following what is happening, and in recognising the deadlines to which we need to work. We find that in talking with people in Crawley many have become 'consultation weary' or 'consultation confused' or 'consultation sceptical'. They have confused the consultations from GAL earlier in 2014 with the current consultation from the Airports Commission. Many people in Crawley turned out for the GAL consultation, because of the large sum of money spent by GAL on publicity, but were disillusioned. Fewer people were aware of the meeting in Crawley, for instance, on 16th December and that the Airports Commission is an independent body.

Q4: In your view, are there any relevant factors that have not been fully addressed by the Commission to date?
The disruption to communities and their activities seem underplayed. The community modules focused more on housing and activities relevant to individuals, rather than the effect on community activities generated within a group of people living in close proximity to one another.

Q 5: 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?
We do not see any measure of the damage to health and the associated cost to the National Health Service.

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

It was helpful to have the more detailed sustainability assessment document to complement the main consultation report. There were several points in the consultation report that were not clear before we read the sustainability report.

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

The business cases, as far as we understand them, do not have measures for assessing environmental impact.

Q 8: Do you have any other comments?

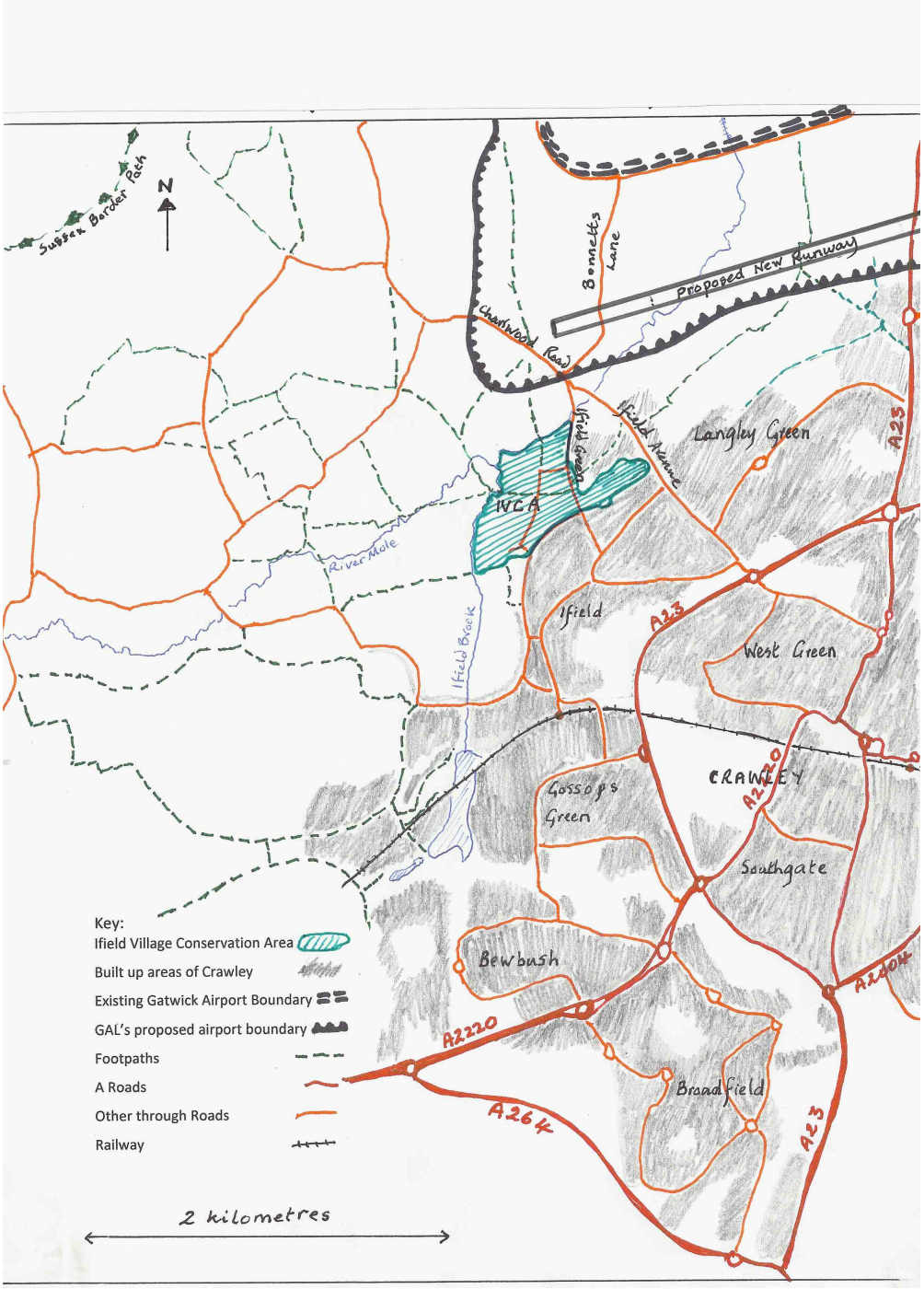
The more we study the report and associated documents, the more certain we become that expansion of Gatwick Airport by the addition of another runway will destroy the nature of the region, the character of Crawley and the character of the Ifield Village Conservation Area. We are, thus, registering our strong opposition to an additional runway at Gatwick.

[redacted]
Secretary, Ifield Village Association, on behalf of Ifield Village Association
IVA.IVCAAC@gmail.com

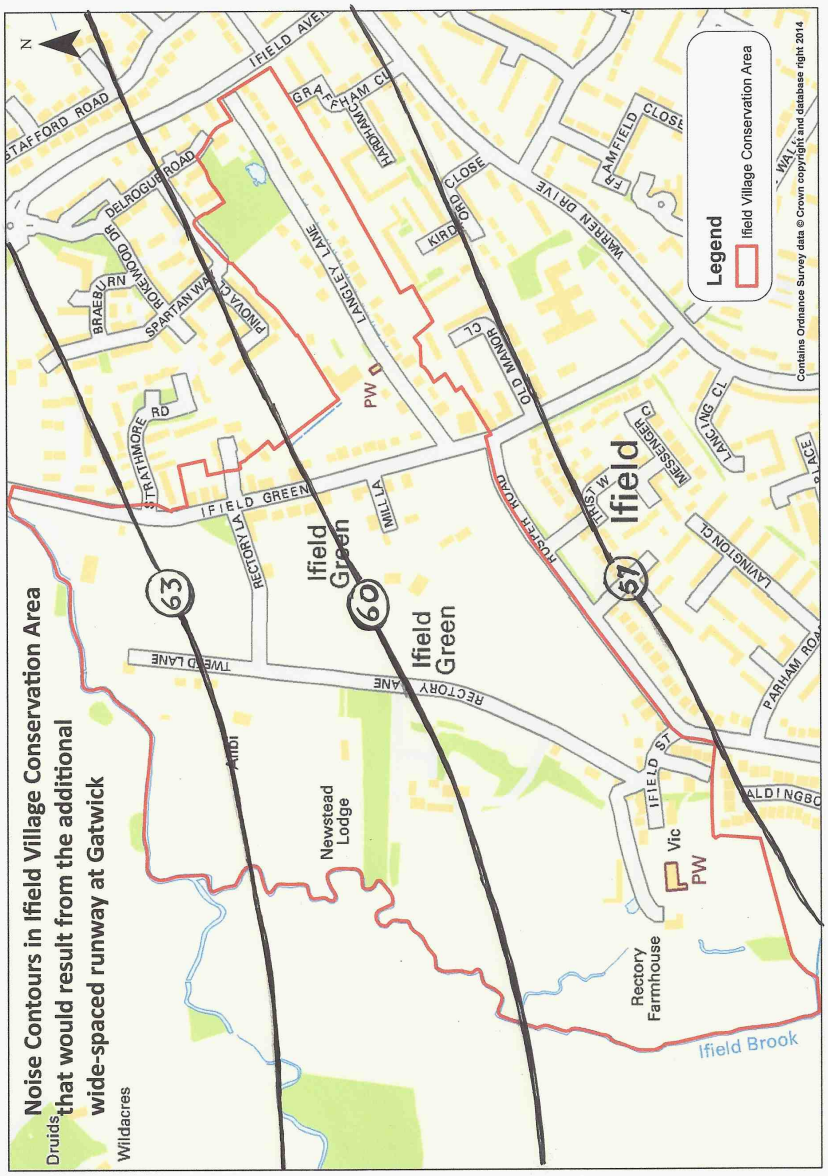
28 January 2015

Appendix 1. Map 1. Ifield Village Conservation Area in relation to:

- **the proposed airport boundary at Gatwick;**
- **the network of footpaths in the rural area to the west;**
- **the built up areas in the west side of Crawley, West Sussex.**



Appendix 2 Map 2 Noise contours in Ifield Village Conservation Area from a second runway at Gatwick Airport.



Appendix 3. Listed Buildings in Ifield Village Conservation Area, Crawley, West Sussex

Langley Lane

National List

Grade 1

Friends Meeting House, Ifield, Crawley, 1676 (one of earliest purpose built Meeting Houses)

Grade 11

Meeting House Cottage (now called The Old Forge, C15th cottage)
Mounting Block in forecourt of Meeting House
Old Inn Cottage 17 Langley Lane (C17th timber cottage)
Apple Tree Farm (Core C17th timber frame. Mid C19 appearance)

Ifield Green and Mill Lane

National list

Grade 11

Michaelmas Cottage (Timber-framed C17th cottage)

Local list

Old Post Office and Malvern Cottage (Edwardian semi detached pair of houses)
The Royal Oak (Early C19th building)
Ifield Steam Mill (Victorian Steam Mill, now converted into a private house)

Rectory Lane

National List

Grade 1

The Old Rectory, Rectory Lane (1840, built round older building)

Grade 11

Newstead Lodge, Rectory Lane (House, earliest part C16th)

Local List

Brookland (little altered impressive late Victorian villa)

Tweed Lane

National list

Grade 11

The Tweed (C 18th cottage)

Church, Ifield Street and associated buildings

National List

Grade 1

St Margaret's Church (C13th with C14th , C19th additions)

Grade 11

Old Vicarage (C18 and early C19)

Lychgate Cottages (Circa 1840)
Harrow Cottage (early C18th), Old Plough Cottage (1600) and Plough Inn (1900)
Table tomb to George and Mary Hutchinson (1800)

Local List

Rectory Farmhouse (Red brick - mid C19th)
Ifield Barn Theatre and Arts Centre (Converted C17th barn and C18th cowshed)