

The Airports Commission

By email only

Direct line: [REDACTED]

Ask for: [REDACTED]

My ref:

Your ref:

Email: [REDACTED]

Date: 28 January 2015

Dear Sir/Madam,

SDC's Response to the Airports Commission Preferred Options Consultation

Executive Summary

Sevenoaks District Council will respond to the Preferred Options Consultation. It has considered the benefits and disbenefits of both Heathrow options and that for a second runway at Gatwick. SDC is aware of the economic benefits which would accrue to the District from expansion at Gatwick but is also mindful of the impacts of increased flights and traffic going to and from the airport. No mention is given of any improvement to train connections from Kent to Gatwick.

Currently considerable problems arise in the south of the District from the noise of low flying aircraft approaching Gatwick particularly at night. There are steps available to mitigate these problems but these have not been implemented. Given this case SDC are not convinced that a second runway would contribute to any noise reduction but would almost certainly lead to increased noise nuisance.

SDC would urge for noise reduction measures to be implemented now whatever the outcome of this consultation.

Introduction

Sevenoaks District Council (SDC) welcomes the opportunity from the Airports Commission to respond to its Preferred Options Consultation. The response will focus on how the proposals impact on the Sevenoaks District and is, therefore, primarily focused on the proposal of a 2nd runway at Gatwick. The Council recognises, however, that the development of either of the proposed schemes at Heathrow would also have implications for residents in Sevenoaks District and so a short section of this response is relevant to those proposals.

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Before responding to the Consultation directly, it should be noted that the Council has responded to a number of different aviation-related consultations in relation to Gatwick, with a particular focus on noise impacts as these are the current, on-going concerns for the Sevenoaks District. SDC recognises that increasing aviation capacity is Government's long term aspiration. However, SDC considers that action needs to be taken now to reduce the current impacts on communities alongside this long term planning. The Council, alongside many others, has consistently responded to consultations from various bodies relevant to the issue of aviation noise to ask that, amongst other things:

- Night time respite is introduced at Gatwick by making a substantial reduction to the number of permitted night flights, as the current level is clearly not equitable in comparison with other airports in the south east, and by introducing a meaningful period in which no night flights are permitted (for example 12AM to 6AM);
- By setting height limits for approaching aircraft that require them to fly at the maximum safe height at all times and by introducing meaningful penalties for airlines when aircraft fly below these levels without independently-verified valid safety reasons.
- By considering and consulting local communities on opportunities to disperse flights more widely within the areas already overflowed to prevent concentrations of flight paths over particular communities.

The Council considers that these are reasonable and easily deliverable steps and is disappointed that the suggestions continue to be ignored. It calls on the Government and the relevant regulatory bodies to act now on this issue. If it does not then the Davies Commission should recommend these actions, amongst others, to Government to help to 'mitigate in advance' some of the issues likely to be caused by the expansion options being considered. The inclusion of such proposals by the promoters of the expansion options would have shown that they were serious about implementing effective mitigation strategies in the delivery stage of their scheme. Disappointingly, this has not been the case with the Gatwick Airport proposal.

SDC is aware that Gatwick Airport is a key local employer within the South East region and that proximity to a major airport can provide a major boost to businesses. Previous consultations by the Airports Commission have considered the opportunities to meet the demand for international and long-distance domestic travel through investment in other forms of transport (such as high speed rail) and the Commission has still concluded that a new runway is required in London and the South East by 2030. SDC does not intend to reopen this debate in responding to the 3 proposals that are the subject of consultation. However, it is disappointing that Stanstead has not made it through to the final consultation. It is noted that, the Airports Commission has based its preferred options on a series of scenarios, testing the viability and benefits that each scheme has for the period up to 2050. Certainly, it appears to the Council that under at least one of the scenarios ('low cost is king') there would be a strong strategic fit between the driver of

growth in demand for flights (budget airlines) and Stanstead's current business model. In this respect, Stanstead appears to be not too different to Gatwick.

Gatwick – Economic Impact

The Commission has forecast that the benefits of a 2nd runway at Gatwick will vary depending on the form that growth in the aviation industry takes and the nature of national/international responses to climate change. The national estimated economic benefit is £42-127 billion. This compares to an estimated economic benefit of £101-214 billion of expansion at Heathrow. The greater national economic benefit clearly weighs in favour of the Heathrow proposals.

It is clearly very difficult to forecast how the economic benefits of airport expansion would be distributed across the country/region but it may be expected that Sevenoaks District would see greater economic benefit of development at Gatwick than Heathrow. Despite this, the analysis of local economic impact undertaken by the Airports Commission suggests that the majority of the benefits of Gatwick expansion would only be felt within those areas immediately surrounding Gatwick and the Coast to Capital Local Enterprise Partnership area, which only extends as far as Tandridge District. Notwithstanding its concerns about the proposal for a second runway at Gatwick (explained later in this response), the Council considers that if this is the Commission's preferred scheme then more must be done to ensure that those areas that will experience the substantial negative impacts of expansion also enjoy the economic benefits. The Commission predicts that direct employment at Gatwick would result in 43,400 jobs in 2030, increasing to 47,400 by 2050 (top tier estimate across all scenarios) but it appears to be the case that very few of these are expected to be accessed by residents of Sevenoaks District.

Nonetheless, the amount of indirect employment available from the 2nd runway could be largely significant to the District and be complimentary to the Council's own economic development ambitions. The Council is currently in the process of finalising its Allocations and Development Management Plan (ADMP). This document outlines the allocations that are required for housing, as well as major employment sites within the District. Fort Halstead has been allocated to be redeveloped as a major employment site. Given the proximity to Gatwick, the expansion could encourage businesses to relocate to the District who are seeking locations near to high quality infrastructure. The development of a 2nd runway may also encourage the development of new hotels in Sevenoaks District and lead to growth in the tourism industry.

Regardless of whether a 2nd runway is developed or not, SDC considers that any proposals to increase the capacity of Gatwick airport in the future must be accompanied by much improved public transport links with west Kent. Subsidy of improved rail links between Gatwick, Edenbridge and Tonbridge should be an important part of Gatwick Airport Limited's proposals but, at present, is not. As well as improving access to jobs and the economic benefits of the development of the 2nd runway, this would also improve the experience of those local residents travelling via the airport. Whilst it would not alleviate the Council's concerns about the proposed 2nd runway, this would at least

provide a stronger positive impact to weigh against the significant negatives of the proposal.

Gatwick – Noise Impact

The construction of a 2nd runway would greatly increase the airport's capacity, both in terms of the number of flights and the number of passengers that it can handle. The Commission states that the new terminal that would service the additional runway would be able to service 50 million passengers per annum (mppa) which is almost double the existing capacity of the existing North and South terminals, increasing the total capacity to 60-96 mppa. In addition, the number of aircraft that would be arriving into and departing from Gatwick is expected to increase significantly. As GAL points out, air transport movements (ATMs) have increased from 50 to 55 per hour since 2009, with the aspiration to increase this number further by late 2020s to 60 ATMs an hour which equates to 251,000 annual movements. From predictions that GAL produced for 2050 with a 2nd runway, there could be twice the amount of annual movements (513,000) if this proposal goes ahead.

The impacts of noise from Gatwick Airport is a key concern of residents in the Sevenoaks District. A large proportion of residents in the south of the Sevenoaks District are currently being over-flown by the departure, but more commonly, the arrival of aircraft into Gatwick. The south of the District is predominately rural with a number of small villages and the impact of the noise is considered to be relatively more significant than in urban areas because of the relative low levels of background noise. Low flying approaching aircraft is a particular concern in these areas. This is having an increasing detrimental effect on a number of national and regional tourist attractions, including but not limited to, Hever Castle, Penshurst Place and Chiddingstone Castle. The tranquillity and settings of these attractions are important to these businesses, which provide employment and contribute to the local economy. The proposed doubling of flights arriving at Gatwick will create more significant disturbance to residents as well as having potential significant negative impacts on the local economy.

SDC welcomes the Commission's acknowledgment that a 2nd runway at Gatwick will have a greater impact on residents than previously described in the original GAL submission, and welcomes that this has been translated into forecasts for the number of people affected, rather than the Commission relying on noise contour maps alone. Additionally, if the numbers of freight flights were to increase, it may lead to higher noise levels than expected highlighted on the contour maps. There is equal uncertainty over the predicted noise impacts of aircraft that are yet to be designed. The Commission notes in its own Sustainability Appraisal that any expansion of Gatwick Airport will have an "adverse" impact on the levels of noise as the increased number of flights would increase the amount of daytime and night time noise.

SDC has previously stated that it is opposed to any expansion option at Gatwick unless it is possible to deliver this whilst reducing noise impacts from the current levels in Sevenoaks District. It welcomes that the Commission has not simply relied on one industry standard approach of measuring and forecasting noise impacts. However, none

of the contour maps prepared capture the extent of the disturbance caused by flights from/to Gatwick over West Kent, which will be apparent to the Commission from the responses it will receive from communities in this area. This brings into question the credibility of simply relying on these metrics, a point that the Commission appears to recognise in the Sustainability Appraisal, where further consideration has been given to those communities outside of the noise contours, which includes the wider Sevenoaks and West Kent area. On this basis, SDC considers that very limited weight should be given to the noise contour maps that suggest that noise will intensify in a north-south axis around the airport but reduce over the east-west axis (i.e. noise levels will reduce in Sevenoaks District as a result of a 2nd runway). In reaching this conclusion, the forecasts have assumed an increased divergence at the east and west of the existing contours. This is inconsistent with recent consultations on changes to flight paths and, at best, must be considered to be uncertain.

As a result, SDC is not satisfied that the development of a 2nd runway at Gatwick would be delivered along with a reduction in existing noise impacts and is unable to support this proposal. In its response to GAL on the 2nd runway proposal, SDC reiterated a number of recommendations made in previous consultation responses to reduce the amount of noise disturbance including:

- A significant reduction in the number of night flights, as current levels is not comparable with other airports.
- Establishing and enforcing minimum heights for aircraft arriving at Gatwick Airport and introducing (and enforcing) strict penalties for not meeting this and related noise limits. The residual background noise level of the area without aircraft, should be used as a reference point to set noise limits for aircraft and the level at which penalties will apply.
- Effective use of non-regulatory instruments such as differential landing fees to reduce night time noise further.
- Working to develop a culture amongst pilots, crews and Air Traffic Control that places noise reduction as a key consideration alongside safety.

Despite these suggestions being made, it is disappointing to find that none were taken into consideration as part of the final submission to the Commission. SDC considers that GAL's approach unduly focuses on mitigating the impact of noise rather than setting strategies to reduce noise itself. For example, financial compensation for residents in dwellings within the 57 dB $L_{Aeq,16h}$ contour will not benefit residents of Sevenoaks District and neither will the proposal that planning authorities should take account of Gatwick's noise contour maps. The Commission's background report on noise notes that there may be the opportunity to implement further noise mitigation measures. Whilst it is not SDC's position that it should, if the Commission is to recommend development of a 2nd runway at Gatwick then it must also set out the basis on which it makes this recommendation. SDC considers that, as an absolute minimum, any recommendation must be made on the basis that all responsible organisations (the airport operator, NATS, CAA and Government) do all that is technologically and economically feasible to mitigate

the noise impacts. At Gatwick this would certainly need to include, but not be limited to, strict penalties for not meeting minimum approach height limits, a substantial reduction in night flights and the introduction of meaningful respite periods, including the banning of flights from 12AM to 6AM, for example.

Gatwick – Surface Access

The proposal for Gatwick's 2nd runway will need to be supported by improvements in surface access, in order to accommodate the expected growth in passenger numbers and number of trips being made to the Airport. SDC is highly concerned that, in general, GAL expects that recently completed and already planned improvements to surface access will be enough to accommodate the additional airport capacity. It awaits the responses of the Highways Agency and Network Rail on this issue with interest.

The majority of people that travel to Gatwick (either for employment or leisure) by road from Kent or areas to the North East of London are highly likely use the M25, M20 and/or M26 through Sevenoaks District. All of these sections of the Strategic Road Network are designated as Air Quality Management Areas, due to the levels of congestion and pollution. It is important that public transport between Gatwick and Kent is improved, to reduce the dependency on traveling by the car, reducing the impacts of congestion on major roads and the motorway network. SDC notes from the Commission's sustainability appraisal that the levels of air pollution (particularly NO_x emissions) would increase significantly on the M25 by 2030, as result of the expansion proposal. This would result in an "adverse" level of impact, unmitigated. If the Commission were to recommend the development of a 2nd runway at Gatwick then improvements to public transport must be made/funded by the airport operator to attempt to alleviate this impact and to ensure that residents in west Kent are able to share in the economic benefits of the expansion (see above). Again SDC believes that the onus should be on the Airports Commission to identify what is required in this respect and make it clear that its recommendation is dependent on the supporting infrastructure being provided.

GAL has been a longstanding supporter of re-instatement of rail services between Gatwick and Kent but this does not form any part of the proposals. Whilst SDC understands that recent studies have indicated that there would be a weak business case for the reinstatement of direct services between Tonbridge and Gatwick (via Edenbridge) at the current time, the development of a 2nd runway would require reconsideration of this. Any future assessment should be carried out on a holistic basis, with the economic benefits for west Kent considered alongside the impacts on the Strategic Road Network and air quality if public transport is not improved. The reinstated service should be more frequent than that previously operated and should be more effectively promoted by the train operator and Gatwick Airport. With the planned improvements to Crossrail and to increase the frequency of the Gatwick Express service, SDC stresses that the focus from this longstanding commitment should not be lost in favour of other projects. The Council has previously noted that, under the terms of the Airport's existing legal agreement, £1 million annually should be spent on public transport initiatives. SDC maintains the suggestion that this should be increased

significantly if a 2nd runway were to be permitted and that some of this money should be used to support this improved rail link should it require subsidy.

Heathrow

In general, SDC takes the view that the local communities most likely to be affected by the 2 proposals for expansion of Heathrow are best placed to balance the positive and negative impacts of the schemes. However, SDC notes that these schemes would have the greatest national economic benefits and considers that they are most likely to be supported by the aviation industry, with the major airline alliances having their UK bases at Heathrow and being unlikely to move, regardless of where a new runway is built. As such, it may be assumed that these proposals are more likely to secure the private finance necessary for their construction.

Despite its concerns over Gatwick, SDC does recognise that there are economic benefits of being near a major airport, although the Commission's assessment suggests that direct benefits are limited in the case of Sevenoaks District's relationship with Gatwick. In addition, those local residents that are not affected by noise from overhead aircraft to the point of annoyance are likely to consider ease of access to a major airport a positive characteristic of an area. As such, whilst SDC recognises that major improvements to rail access to Heathrow are already committed, it is concerned that the Heathrow schemes are not accompanied by proposals to improve capacity on the western section of the M25. This is of concern not only because it will impact on the ability of residents in Sevenoaks District to access the airport but also because it is likely to increase congestion and journey times to the west and north-west of the country. The proposals are likely, in fact, to limit any opportunities for further capacity increases on a key part of this section of the M25 by placing the road in a tunnel. The implications of this over the long term need to be fully considered if the Airports Commission is to recommend that either of the Heathrow proposals go ahead.

Yours sincerely,

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