[redacted]

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

Wealden District Council has considered the information presented on all three shortlisted runway options. Whilst the Council is keen that any runway proposals taken forward in the South East bring economic benefits that may benefit local residents of Wealden, it appears from the information presented, that both Heathrow Options present far greater potential economic benefits at a national and regional level than the Gatwick Option. In terms of the estimated increase in passengers per annum, jobs created and economic impact, the figures for both Heathrow Options are in the region of between 2 and 3 times greater than figures given for the Gatwick Option. In relation to potential longer term National economic benefits therefore, it appears that the potential benefits from both Heathrow Options far outpace the Gatwick Option.

The greater economic impact that both of the Heathrow Options provides is primarily due to the different nature of aviation operations (i.e. more of the global market) that Heathrow can support over the more 'low cost' operations at Gatwick, the greater level of air freight that can be supported at Heathrow compared to Gatwick, the scope and proposals to support a greater number of aviation related industries and services within the Heathrow area – and better connectivity by road from these areas to Heathrow, as well as the greater ease and variety of rail connections to other parts of the country. These appear to give greater accessibility to passengers, businesses and visitors/tourists to London, the Midlands, North and West of the Country that can be enabled through the Heathrow Options over and above that offered by the Gatwick Option.

However it is recognised that the estimated overall costs of the Heathrow Options are much greater than that of the Gatwick Option, by around 1 – 1.5% which will also be a consideration for the Government, but this will need to be considered against the greater economic benefits that will in the Council's opinion, be delivered through the Heathrow Options,

Social and Environmental aspects are also key considerations in the selection of the runway options and these are covered in more detail in response to questions below. Overall, in terms of benefits to the regional and national economy, however, it appears from the information presented, that both Heathrow Options perform better than the Gatwick Option.

Because of the lack of information on the local economic benefits and the potential environmental impacts as outlined in response to Questions 3, 4, 5, and 6, the Council DOES NOT SUPPORT THE GATWICK OPTION and notes that the Heathrow Options appear to provide greater economic benefits than the Gatwick Option .

Which of the shortlisted runway options, if any, do your comment(s) relate to?

Gatwick Second Runway

Heathrow North West Runway

Heathrow Extended Northern Runway

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

The Council feels that a number of aspects need to be addressed and/or require further work. Most of these aspects relate to potential impacts on areas adjacent to the footprint of the airport, where the Council feels that further mitigation may be required. These aspects, including impact on local roads, biodiversity and noise, are covered further in responses to the remaining consultation questions.

Which of the shortlisted runway options, if any, do your comment(s) relate to?

Gatwick Second Runway

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

Yes. The Commission has been open in stating that the issues around Air Quality and the inputs required to assess these issues, are so complex that this work has not yet been completed. However, the results of the Air Quality work will inform the final recommendations of the Airports Commission. This does not enable stakeholders and local communities to comment on the results nor assess the results of this work and the effects on local communities and natural environments. Nor does it provide opportunities to assess the suggested mitigation that will be a result of the work being undertaken. Given that the Commission recognises the complex nature of this work, it seems essential that there should be some further consultation on Air Quality before the Commission puts forward a recommendation to Government.

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

Yes
with regards to the Gatwick Proposal
the Council wished to re-iterate issues in relation to the on-going Air Quality work, set out in response to Question 3 above.

In addition, The Council feels that the potential impact of a new runway at Gatwick on the sensitive ecology of the Ashdown Forest has not been properly or fully addressed. This is a major

infrastructure proposal with potential impacts that go beyond the footprint of the proposal. Not all of these impacts have been fully addressed in the Council's view particularly in relation to impacts of extra vehicular traffic and NOx emissions on the Ashdown Forest.

The Ashdown Forest is protected by European Legislation. Any proposal potentially impacting on the Ashdown Forest requires an Appropriate Assessment under the Habitat Regulations. There is no indication that any work has been done or considered in relation to the Habitat Regulations regarding the potential in-combination effects that additional traffic generated by a proposed second runway at Gatwick would have on the Ashdown Forest.

The Biodiversity Assessment work includes a paragraph which refers to the Air Quality Monitoring Work being carried out by this Council. This is to inform our Local Plan Core Strategy review and the Appropriate Assessment work that we need to do to meet our duty as required by the Habitat Regulations. The monitoring and subsequent modelling work will therefore only address matters as relevant to the Council's Local Plan. We will not be in a position to carry out the Appropriate Assessment work until we have results from this monitoring exercise. It is anticipated that the first round of results will be received following several years of monitoring. Verification of the air monitoring and traffic monitoring models will be possible once a full year of monitoring data is available.

The results will enable us to determine whether any additional housing or employment development within our own District is likely to result in adverse effects on the integrity of the European site and whether it will be possible to mitigate any such effects if further development is proposed. However, the results may indicate that further monitoring years are required prior to being in a position where conclusions can be drawn with the required certainty as firmly stipulated within the legislation.

The Council does not consider that the Airports Commission relying on the Council's monitoring or modelling results is enough, nor does it feel that it meets to your requirements to conform to the Habitats Regulations in relation to the runway proposals. In addition, the statement in the Biodiversity Assessment suggests that further work will be done to reassess impacts once the Council's monitoring work has been completed. As the first round of results will not be received by the Council for several years, the decision on which runway option should be supported will be made without consideration of the requirements under the Habitat Regulations or without any modelling as relevant to the additional runway proposal.

The Government's Aviation Policy Framework (March 2013) – provides a comprehensive overview of environmental impacts and the interrelationship between various impacts. The Council is concerned that the study of Airport Runway Options does not present evidence in a way which recognises the complex relationships between various aspects of the proposals and the impact on the environment in line with the Aviation Policy Framework, particularly the impact between increased local traffic generation on roads leading to the airport, noise, Air quality, NOx emissions

from aircraft and road vehicles and the impact on the sensitive environment of the Ashdown Forest.

As a minor point the Council would like to add that inclusion of this statement which relies on the results of the Council's own monitoring exercise was carried out without any discussion with the relevant Council officers regarding the suitability or acceptability of doing so. The Airports Commission should be clear that the monitoring being carried out on the Ashdown Forest is in relation to NOx emissions from road vehicles and should not be confused with the NOx aerial emissions from aircraft – these are two different things.

The Council consider that the impact in relation to local surface transport is and in particular the impact on local roads coming off the M23, which also feed the airport, has not been fully considered – either in relation to impact or in relation to the mitigation measures and improvements to highways that may be required.

An increase in the level of noise experienced is inevitable taking into account the nature of the proposal. This needs to be balanced against large numbers of people affected in densely populated communities and the impact on health versus the impact upon smaller communities and the tranquillity of rural areas. The changes to departure routes at Gatwick over the summer have caused considerable concern to residents in the north of the District. Although this is a separate issue to the proposal for an additional runway, there should be greater consideration of potential routes and changes to stacking patterns etc. in the consideration of proposals as they go forward. The Council notes that the consideration of amendments to the London Airspace – which was consulted upon last summer, has been delayed pending the recommendation of the Airports Commission. The Council feels that the proposed amendments should be further considered in relation to the impacts that these may have on the runway options being considered, and should be reported back to Stakeholders and Communities.

On another issue, the Council believes that the Commission has seriously underestimated the challenges that exist in relation to the provision of housing to support the additional workers who will be employed as a result of the Options proposed. Local Authorities in the South East are struggling with the challenge of planning for and delivering housing in relation to assessed need within their local authority areas, due to land availability, environmental and infrastructure constraints. The Commission does not appear to have carried out any assessment of need nor assessment of where new workers might live nor considered the appropriate number of new houses local authorities may be required to take to accommodate workers. The current residence of workers at Gatwick is not evenly spread. East Sussex County Council have estimated the current number of workers living in the County who are directly employed by Gatwick as 5.3%, with 2.8% of these living in Wealden, 1.5% living in Lewes and 1% living in Eastbourne. This equates to around 1,100 jobs currently with a projected increase to 3,400 employed directly by Gatwick by 2030. Assuming a similar distribution of employees in the future, simply dividing the projected housing requirement between 14 local authorities will not reflect the current

concentration of workers in particular localities. Housing provision which is ‘evenly spread’ therefore, may not meet the needs of future workers at Gatwick. Further work is required in relation to this broad projection, the assumptions and the impacts associated with it.

Wealden is one of the 14 Local Authorities listed in relation to accommodating a proportion of the required 18,400 homes to support the Gatwick proposal – at a suggested rate of 160 dwellings per year. The consultants have assessed this challenge as small – but it is not. We already know that some of our neighbouring authorities are unable to meet their own needs and under the Duty to Co-operate will look to other local Authorities to take some of their housing requirement. The Council has been approached by neighbouring authorities under the Duty to Co-operate and will have to consider the requirements of others alongside our own ability to deliver assessed housing need through our Local Plan review, whilst working with the challenges that the environmental constraints associated with the Ashdown Forest and Pevensey Levels bring.

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?

Biodiversity

Yes. Much emphasis is placed on the loss of Green Belt and Metropolitan Open Land in relation to the two Heathrow Options. Whilst Green Belt land take in relation to the Heathrow Options is considerable, the Council does not consider that the same level of emphasis has been placed on the Area of Outstanding Natural Beauty (AONB) in relation to the Gatwick Option. AONB is a designated landscape and receives greater legal protection than Green Belt land.

In all three options, the Commission has adopted a very narrow footprint – (relating pretty much to the proposal and existing airport envelope and access roads) for the assessment of impacts and mitigation requirements. The baseline for many of the topic areas in the background document, such as in the Biodiversity topic paper, is generous, often covering a wide geographical area. However the assessment of impact and potential mitigation measures has been reduced to a much narrower scope – relating to the footprint of the airport and the area for adoption and highway improvements. It is not clear from the documentation why such a narrow footprint has been adopted, but this could result in many impacts of the proposal not being addressed. The possible impact on the Ashdown Forest – an internationally protected site, through increased vehicle movements as a result of the airport proposals – as outlined in response to Question 4 above, is one example.

The scope and impact in relation to local surface transport is also very concentrated. The impacts are taken in relation to the main junctions (9 and 9a) to the airport from the M23 and local access roads within the airport. There is no consideration of impacts on local roads coming off the M23, which also feed the airport. The documentation shows that at present 75% of workers at Gatwick arrive by car – by 2030 this figures is projected to fall to 60%

but this is still represents a considerable number of vehicle movements on local roads to the airport, the impact of which the Council feels has not been fully considered.

Which of the shortlisted runway options, if any, do your comment(s) relate to?

Gatwick Second Runway

Economy impacts

The Council would refer to the response to Question 4 in relation to housing requirements to support the Gatwick Option. The housing requirement is included in the topic paper on Local Economy Impacts, but it is unclear how this figure was derived. This does not appear to be adequately covered in the methodology and it is hard to see how this specific figure relates to the range of figures given for projected job creation, which is based on a range of scenarios. In addition, the very specific requirement for additional schools and GP services does not seem to be based on any assessment of infrastructure requirements in the 14 Local Authorities and three Local Education Authorities who are projected to accommodate the required housing and infrastructure.

As referred to above, the projected employment generated by the Gatwick Option is shown as a broad range based on different scenarios. Comparing the three runway options which have been assessed against 5 scenarios (assessment of need, global growth, relative decline of Europe, low cost is king and global fragmentation) and 2 carbon models (carbon capping and carbon trading) and in some cases two time frames (2030 and 2050), produces a number of variables. It is difficult therefore to get a clear picture of the likely scenario that may be followed and from that the likely benefits, impacts and mitigation required and how this links to the number of jobs created, homes required and traffic generated.

Which of the shortlisted runway options, if any, do your comment(s) relate to?

Gatwick Second Runway

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

Yes. The key issue regarding the sustainability assessment that the Council would raise is that as referred to in the response to Question 5, the assessment of impacts and mitigation required relates pretty much to the footprint of the proposal. The Council feels that this does not address the wider impacts and in-combination effects that these major infrastructure proposals have on the wider area. The sustainability assessment therefore is somewhat skewed and the mitigation measures restricted to the footprint of the proposal as a consequence. The Council does not consider this to be sufficient as the basis of any further Sustainable Economic Assessment that

may be required to take the proposal forward to delivery. The scope for the assessment of impacts and mitigation requirements needs to address a wider area than the footprint of the proposal.

The Council wishes to refer again to the response in relation to Question 4, with regards to the methodology and grave reservations the Council has in relation to the Habitat Regulations with respect to the impact the proposal may have on the Ashdown Forest.

In addition, please see the Council's response in relation to Question 5, with regards to the methodology and results used in relation to projected housing and job creation and the expected model of housing delivery as outlined in response to Question 4.

Which of the shortlisted runway options, if any, do your comment(s) relate to?

Gatwick Second Runway

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

Yes. The Council would like to refer to its response at 5.3, relating to the number of potential variables that assessment of the 3 options, 5 scenarios, 2 carbon options and 2 timescales gives. This makes it difficult to gain an accurate picture of the likely scenario in each runway Option, and therefore the likely benefits, impacts and mitigation measures required. It would have been helpful if the high level sifting process and preparation of the business case for each option, could have eliminated some of the least likely scenarios and addressed a couple of the most likely scenarios in more detail. This may be part of the next stage in the process, but with such wide ranging figures in relation to projected Air Traffic Movements, passenger numbers, estimated jobs created and economic impact, it is difficult to know whether to take a worse case, best case or mid range scenario as the most likely level of benefit/impact to assess.

Which of the shortlisted runway options, if any, do your comment(s) relate to?

Gatwick Second Runway

Q8 Do you have any other comments?

Yes. The Council understands the need to address runway capacity issues in the South East. An additional runway at Gatwick may bring economic benefits to the area and to residents of Wealden however, it is difficult given the level of information presented and some of the gaps in information that exist, to assess accurately what those economic benefits may be.

The Council also has grave concerns about some of the impacts that an additional runway may bring, and is concerned that insufficient work has been carried out to provide the evidence to show what the impacts will be across the District, particularly in relation to the Habitats regulations and the Ashdown Forest, and how these impacts may be addressed. In addition, it is not clear how far the topography of the Weald has been taken into account in relation to the angle of descent and height above ground of aircraft coming into Gatwick, and the consequent impact that this will have on habitats and communities living under the flight path.

The work undertaken by the Airports Commission suggests that both of the Heathrow Options will accrue greater local and National economic benefits than the Gatwick Option, but many of the same issues raised in our responses to the consultation will relate to the methodology and results of projections in the case of the two Heathrow Options also. Therefore the conclusion referred to in response to Question 1 regarding the apparent greater benefits offered by the Heathrow Options can only be a preliminary one.

Should the Airports Commission recommend a second runway located at Gatwick, Wealden District Council re-iterate the views expressed by East Sussex County Council in their representation namely, ‘that Gatwick Airport Limited honour their package of pledges to mitigate and/or compensate for such impacts and invest in necessary social and transport infrastructure and training opportunities, and that Gatwick Airport Limited fully fund and deliver this package which is secured through an appropriate legal mechanism or by statute; and that in either a one or two runway scenario at Gatwick there being a more equitable approach to arrival flight paths being introduced over the county when changes to airspace management are made.’

Given the Council’s grave concerns regarding the potential impacts on the Ashdown Forest, local roads and communities however, and the need to do further detailed work and assessment in relation to these potential impacts, and further work is carried out to identify the local economic benefits to Wealden and its residents, we cannot draw any firm conclusions or support the Gatwick proposal at this time.

Which of the shortlisted runway options, if any, do your comment(s) relate to?

No Airports Selected.