

SUBMISSION AND REPRESENTATIONS TO THE AIRPORT COMMISSION BY CAPEL PARISH COUNCIL (MOLE VALLEY DISTRICT)

1. Introduction

In November 2014 the Airports Commission (AC) published the consultation document into the Gatwick Airport Second Runway, Heathrow Airport Extended Northern Runway and Heathrow Airport North West Runway.

Capel Parish Council together with 44 other Parish Council's in Surrey, Sussex and Kent object to the proposals for Gatwick Airport.

In this representation we not only have regard to the deficiencies in relation to Gatwick Airport Ltd., (GAL) but also the significant benefits to be achieved from the expansion of Heathrow Airport as the appropriate runway option to be secured for the future of airport transport.

Capel Parish, which comprises three villages namely, Capel, Beare Green and Coldharbour is located 6 kilometres to the west of the airport boundary runway. Capel Village is 7.5 kilometres and Beare Green 8 kilometres from the runway with Coldharbour being 1 kilometre further to the north west. The Parish is identified on the attached plan. (**Annex 1**).

The locational context of the airport to the villages will not alter but in terms of impact significant increased levels of activity will be to the detriment of the communities and their environs as is evidenced by the map of new flight paths (Map indicative arrival and departure paths). Furthermore, if the RNAV Route RWY26 is implemented its impact, linked to an intensification of flights generated by an additional runway, would create intolerable living conditions on the Parish and the wider Mole Valley community.

The villages are in an elevated position rising from 110 metres to 275 metres AOD and subject to adverse impact from aircraft westerly departures. Given the constraints imposed by Leith Hill (292 metres AOD) the flight movements from Gatwick Airport are intensified due to that topographical constraint and the need to follow the Lambourne routing.

2. The Gatwick Master Plan

The Consultation Document at Paragraph 3.1 identifies the Master Plan (source GAL). The starting point for our representation is that Master Plan has irreconcilable errors in its detail.

The Parish Council have referred to this error which make no reference to the development granted planning permission by the Secretary of State for Communities and Local Government known as Forge Farm (Crawley North East Sector) which will comprise housing for at least 6,000 people, schools, employment, community and recreational facilities.

The relationship of the GAL proposals and the North East Sector (Forge Farm) is identified on the attached plan (**Annex 2**).

The location of this development, which has Full and Reserve Matters approvals and has recently been implemented, can be best identified in the following context:-

- East of the London to Brighton railway
- West of the M23
- North of Crawley Avenue
- South of Radford Road and Speers Lane

In simple terms it lies immediately to the south of Gatwick Airport. The closest dwellings will be within 600 metres of the eastern end of the proposed new wide space runway.

In the opinion of the Parish Council the omission of this site is both significant in its error and cynical in the intention of GAL as its development compromises the new runway option.

Why cynical, because the Master Plan shows a noise wall from the A23 at Lowfield Heath through to the London Gatwick/Brighton railway. GAL were a formal party to the Public Inquiry which was determined, a grant of planning permission, they were party to the discussion in relation to the Master Plan, they were party to the High Court Challenge in relation to grant of planning permission.

Mr. Justice Collins in his High Court Judgement (CO/5202/2007) made specific reference to the long term demand forecast for air traffic referring to the wide space second runway option at Gatwick and the need to safeguard land for that runway and the implications that would have should planning permission be granted for the North East Sector development.

Mr. Justice Collins had regard to noise nuisance and environmental impact. He also referred in his Judgement to the position taken by the Secretary of State and the material consideration being given in the context of the airport proposals and the future development of the North East Sector.

The Secretary of State asserted in the decision letter (and referred to in Paragraph 24 of the Judgement) that ***“aircraft using a second runway would result in noise levels within the proposed housing area well beyond those which would be likely to cause community annoyance and significantly in excess of the 60bD which PPG24 recognise as a desirable upper limit for major new noise sensitive development.”***

An extract of the High Court decision is attached to this representation (**Annex 3**).

The decision of the Secretary of State in granting planning permission for the North East Sector made specific reference to the effect of noise from a second runway at Gatwick. In Paragraph 21 the Secretary of State shared the Inspector's view that ***“there is little doubt that during consideration and detailed plans for a second runway, the residents of the North East Sector would add to the voices calling for the runway to be operated in segregated mode.”***

An extract of the decision of the Secretary of State is also enclosed (**Annex 4**).

Fact

It is a fact that if the second wide space runway were built and operated in mixed mode undesirable levels of noise would be endured by 60% of the residents of the site (between 3,000-4,000 residents).

The Consequence

The consequence which now prevails following the grant of planning permission for Forge Farm and its implementation is that it must override any option for the wide space runway. The conclusion is that proposals for Gatwick Airport have to be considered in the context of an implemented and occupied development. It is inconceivable the Commission would impose an intolerable living environment upon that community.

Evidence – Objection by Crawley Borough Council

The evidence of Crawley Borough Council to the Inquiry is referred to in Paragraph 7.11 of the Inspector's Report to the Secretary of State and states in clear terms that Crawley Borough Council currently does not support the growth of Gatwick Airport beyond its one runway, to terminal capacity. In the intervening period this position has been reviewed by the Borough Council but most recently and significantly they have reaffirmed their position not to support the airport growth.

An extract from the Inspector's Report is also attached to this recommendation (**Annex 5**).

Other considerations in relation to the impact this wide space runway would have on the development include:-

- (i) Unacceptable noise levels for new schools which indicate that 60dBLeaq should be regarded as the upper limit for formal and informal teaching areas. It is also significant in the context of the World Health Organisation guidance with a view to noise levels exceeding 50dBA will result in unacceptable conditions.
- (ii) The levels will interfere with auditory communication;
- (iii) Sleep disturbance;
- (iv) Impact upon social behaviour
- (v) Impact on outdoor areas, parklands and conservation areas;
- (vi) Impact upon living areas;

All of the above will not only impact upon the North East Sector but significantly will adversely affect Capel Parish in its entirety.

Having outlined the significant impact to be considered by the Commission in relation to North East Sector our response now addresses other key topic areas identified in the consultation document.

Employment and Housing

GAL have already identified and referred to the prospect of 122,000 new jobs. 22,000 jobs would relate to the airport by 2050 and 100,000 catalytic jobs over the same period.

The inevitable consequences of these employment figures are two fold. Firstly, in relation to the employment level there would be a requirement for at least 20,000 new homes. The second area of adverse impact would be upon the transport infrastructure.

Impact upon the Countryside

Turning first to the new homes position, there would be an overriding requirement for this to be met through development of 'green field' sites, none of which are proposed within the Strategic Plans of any of the Local Authorities in either this or the Plan Period beyond 2026. Indeed, the constraints imposed by the Green Belt, the countryside and Areas of Outstanding Natural Beauty limit the options by which housing projections could be achieved. Furthermore, given the opposition of the authorities to the expansion, the inevitable consequence is that housing provision will not be achieved within the Statutory Planning Process.

In comparison the expansion of Heathrow Airport can facilitate (primarily) within existing employment and housing infrastructure.

Planning Policy

In Planning Policy terms within the Greater London Area the majority, if not all of the housing requirements can be met. The employment needs of Heathrow Airport can be accommodated through the planning powers of the GLA by the use of vacant, under-used derelict and reclaimed brown field sites.

Airport related airport activities (retail and warehousing) can be provided in close proximity to Heathrow Airport, in particular, the employment of the industrial areas of Slough and Stockley Park and further to the west the technology parks in and around Reading.

Sustainable Transfer

Sustainable and acceptable levels of transport can all be achieved within the corridors to the east and west of Heathrow, a clear distinction to the situation which prevails now in relation to Gatwick and will remain in the future.

Rail Network/Road Network

The north-south railway network is constrained. The north-south road network is constrained, in particular, the inability of the road network north of the M25 not being capable of improvement. The M25 east and west of its junction with the M23 is also severely constrained.

The M25 has, in recent years, been subject to road widening improvements, the capacity of which has already been reached and with no reasonable prospect of any further improvements being made.

It has been suggested by GAL that a future major road link could be made west linking to the A24 as an alternative route with potential links to the north. This again is an unrealistic proposition given the constraints north of Horsham towards the junction of the A24 and M25.

All of these limits not only impose irreconcilable constraints linked to future airport capacity at Gatwick. GAL have also referred in their submission to one million metric tonnes of freight their proposals are devoid of any evidence based as to the generation of these freight levels and where the storage associated with the freight could be accommodated.

Sustainable Transport

Access to Gatwick Airport can be summarised as follows:-

- (i) Motorway links via M23 and M25;
- (ii) Non motorway/highway links;
- (iii) Railway links via London Gatwick/Brighton rail;
- (iv) South-west rail links via Horsham and west via Guildford through to Reading.

All the above are heavily constrained and the motorway network has already reached saturation. The alternative options are through the rural road networks east and west of Gatwick and **A road links**, the majority of which are, in any event, single carriageway with any traffic increases having a significant and adverse impact upon the towns and rural communities.

Heathrow

Heathrow Airport already benefits from major transportation infrastructure which can be outlined as follows:-

- (i) Motorways – the interrelated network of motorways, M1, M4, M40, M3 and M25;
- (ii) Interrelated traffic roads, A40, A4, A3, A30, A303;
- (iii) The rail network, including cross rail at present under construction, underground, overground railway links to the airport;
- (iv) The proposed HS2 link, which we consider is likely to be constructed and will provide even greater significant links to major towns and cities.

Regional Airports

Regional Hub Airports, Aberdeen, Glasgow, Leeds, Liverpool and Newcastle all support the expansion of Heathrow. The above airports and Manchester do not support Gatwick.

Passenger Capacity and the Airlines

It is inevitable that the driving force for either airport is the demand of the airport users (the airlines). Unlike Gatwick Airport there is positive support on the International Airports for Heathrow given its International connections and hub criteria.

The passenger capacity of Gatwick remains unfulfilled. This in itself removes the imperative for expansion with spare capacity still prevailing beyond 2050.

The regional airports also provide an established sustainable network for both international and domestic flights.

The emergence of new aircraft with increased capacity further reduces the demand for an additional runway this allied to increased passenger numbers, all of which combine to demonstrate why the expansion of Heathrow Airport should be supported and while the current prevailing provisions at Gatwick remain even if terminal capacity is increased at Gatwick this would not require any additional runway.

Turning now in specific terms to the Invitation to Respond (Paragraph 4.7).

Q1: What conclusions, if any, do you draw in respect of the three short-listed options? In answering this question please take into account the Commission's consultation documents and any other information you consider relevant. The options are described in section three.

In comparing its appraisal results against the three scheme promoters' analyses the Commission has made identical comments in each case viz:-

In some cases Gatwick Airport Ltd has proposed potential mitigations that at a high level appear well judged and reasonable but have not been (and at this stage would be very hard to be) quantified.

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A justified conclusion, and indeed criticism, of the Commission's approach is that it has clearly worked hard to avoid giving even the slightest impression that certain aspects of the proposals justify greater support than others. As a result comments such as those highlighted above are impenetrable and anodyne in the extreme.

However, it is possible to draw two conclusions from the "key areas of difference" highlighted.

- *One is that the expansion of Heathrow is likely to drive the need for more commercial development locally for those businesses that most value ease of access to the airport. The Heathrow Hub proposal does not envisage such provision within the airport boundary and this could either limit the opportunities for these businesses to develop or rely on development occurring elsewhere in the local vicinity. However, Heathrow Hub Ltd believes that any such constraint is positive, potentially encouraging movement up the value chain by incentivising lower GVA businesses to locate away from the airport. Either way this provides an upside to the Heathrow Hub proposal. There is no such upside to the Gatwick proposal.*
- *A second conclusion is that Gatwick Airport Ltd has been over-ambitious; when compared with the Commission's assessments in the four areas highlighted it forecasts higher passenger numbers, lower costs, lower aero charges and a complacent view of customer service levels during delivery of the scheme.*

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

There is a serious error/omission from the Gatwick proposal.

The Crawley North East Sector is the location for 1,900 houses for 6,000 people, plus schools, other employment areas and open spaces – all within 600 metres of the proposed runway and where development has already been implemented. Yet this significant development does not feature on the Gatwick Masterplan, as set out on Page 38 of the Consultation document.

Were the full 1,900 houses not to be built this will increase the requirement of the 14 District Council's (as set out in Paragraphs 8.13 and 8.14 of the Gatwick Airport Second Runway: Business Case and Sustainability Assessment) by over 10%. Furthermore, the Gatwick proposal could not be allowed to proceed in its current form given the intolerable impacts that would befall the 6,000 people sited only 600 metres from the proposed runway.

This serious omission and its consequences must be addressed.

The Commission have failed to have regard to the benefit of the regional airport networks. Sustainable transport is at the heart of the Government's agenda and this should be recognised by the Commission as a material consideration in delivering future demands for air transport.

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

The Commission has made no serious attempt to determine the need for a further runway at Gatwick. It has relied principally on the Government's assertion that a further runway is required, either at Heathrow or Gatwick.

The Business Case is consequently anodyne and unconvincing. The document states that future demand is primarily determined by central projections published by sources such as the Office for Budget Responsibility, OECD and IMF. This is simply not good enough for such an important decision.

GAL assumes an increase in other long-haul carriers' presence at the expanded airport, which would offer an alternative option to a constrained Heathrow for accessing London's large origin-and-destination market. A vain assumption by GAL, as in contrast to the global growth scenario, it does not assume that an airline alliance would move from Heathrow to Gatwick. In fact quite the reverse is happening as evidenced by an announcement in early January, by Heathrow's chief executive John Holland-Kaye, of Vietnam Airlines' decision to move its UK flights from Gatwick to Heathrow. This is a serious blow to GAL, and is further evidence that long-haul flight operators have no confidence that Gatwick can operate as a sustainable "hub" airport.

The report states that there is currently only a limited freight handling and forwarding presence on or around the Gatwick site. Sufficient space exists around the proposed Gatwick Airport Second Runway master plan for the provision of these facilities, but the commercial factors that would determine their success are difficult to appraise with any degree of certainty at present.

Any significant growth in the cargo sector at Gatwick would require significant investment by third parties in the provision of these facilities. Indeed it would! But the Business Case makes no attempt to identify any current unfulfilled commercial demand in the local area nor any sectors where demand is likely to arise in the medium to long term. Why would cargo handlers invest without the prospect of certain demand for their facilities? The truth is that future growth in manufacturing/commercial activity is not going substantially to occur in the south-east of England. Given the direction of Government policy, including the building of road and rail infrastructure, demand can be expected well north of London. In a scenario of national growth in manufacturing any demand for cargo/handling facilities in the south-east can be expected to benefit Heathrow, which already has significant infrastructure, and which in turn can be more readily expanded.

There is no significant national pressure from business for a second Gatwick runway. The CBI favours expansion at Heathrow rather than at Gatwick. Recently 23 Chambers of Commerce representing more than 40,000 UK businesses have written an open letter to the Airports Commission about the benefits of Heathrow Airport expansion.

Add to this that many people believe that a second runway anywhere in the South East would take business away from other regions of the UK that need employment and thus be damaging to the UK's economic recovery and the rebalancing of the economy

The Commission's forecasts suggest that the number of business passengers using Gatwick is likely to be highest when significant growth in long-haul connectivity is seen at the airport, although it remains dominated by leisure travel under any scenario. That is the reality of Gatwick. And without any serious prospect of new, strong commercial demand there can be no viable case for a new runway to handle increased "leisure" activity, when so much capacity to satisfy leisure demand exists at Stansted and other airports north of London, which are only half full. Furthermore the trend for more passengers per plane can confidently be expected to continue.

Q8: Do you have any other comments?

None of the proposals make long term sense. Of the three the Heathrow Hub proposal looks a poor best with Gatwick clearly the worst option. The estuary proposal, jettisoned far too early, has to be the best option with, in due course, a vacated Heathrow being turned into a large enterprise zone, which would become a major driver of the manufacturing renaissance that the UK sorely needs.