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Dear Sir Howard,

Airports Commission Consultation: Shortlisted Options for Additional Airport Capacity – Response from Kent County Council

Thank you for this opportunity to comment on the Airports Commission's appraisal of the shortlisted options for additional airport capacity. The responses to the consultation questions set out below convey Kent County Council's views on the proposals. Kent County Council's Cabinet agreed at a meeting on 1 December 2014 to oppose a second runway at Gatwick Airport, oppose the increase in overflights across West Kent as a result of airspace changes, and support a reduction in the number of night flights.

In terms of the second runway proposal, Kent will experience negative impacts in terms of increased aviation noise from more than a doubling of aircraft movements and suffer from a lack of respite provision with the use of both runways in mixed mode operations. Aviation noise in West Kent from Gatwick's current single runway configuration is already unacceptable and a potential doubling of this impact with a second runway would be intolerable. The noise impacts will be further exacerbated by the concentration of flight paths due to the implementation of the Future Airspace Strategy. This will inflict intolerable noise on communities with every single aircraft flying a single route on approach to the airport.

Government policy to limit and, where possible, reduce the number of people significantly affected by aircraft noise, should not result in a preference for aviation noise being inflicted on smaller populations in rural areas. Densely populated urban areas are noisy environments, whereas rural areas have low background noise levels and therefore aircraft noise is more intrusive. The tranquillity of the countryside around Gatwick, much of it part of Areas of Outstanding Natural Beauty (AONB), should be protected for both its amenity value close to Greater London and for the people who live there.

The current high number of permitted night flights at Gatwick (11,200 movements, almost three and a half times more than Heathrow's permitted 3,250 in the summer

season) depriving people in West Kent of a decent night's sleep and negatively impacting on health is unacceptable to Kent County Council. The recent eastward shift of arriving flights joining the final approach over the Tunbridge Wells area, which have been focused by air traffic control into a narrower swathe, has caused considerable distress to the communities of West Kent; and this is also unacceptable to Kent County Council.

Significant investment in transport infrastructure is needed across the South East to cope with population growth. Although there has been investment in transport in London, the surrounding areas of the South East have not seen the level of investment required to accommodate growth. For example, in the Thames Gateway a new Lower Thames Crossing is needed to alleviate the capacity constraint on the existing crossing and help deliver housing and economic growth. The M25 is already severely congested and will require further capacity enhancements to accommodate the increased demand. Growth in London and the South East will put increased pressure on already strained infrastructure and this must be considered alongside the increased demand from airport expansion; rather than merely assessing the needs of airport surface access in isolation.

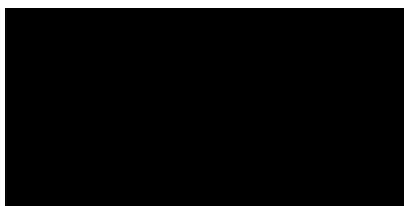
A lack of adequate surface transport enhancements to accommodate the additional demand from a second runway at Gatwick will result in further congestion and delay on the strategic road and rail networks. This is in contrast with the planned step changes in surface access by rail to Heathrow, specifically through the provision of Crossrail, HS2 and Western Rail Access.

The negative impacts of Gatwick expansion are not outweighed by the direct economic benefits to Kent, to which there is very little evidence. Therefore;

Kent County Council is opposed to the proposed second runway at Gatwick Airport.

All prior submissions by Kent County Council to the Airports Commission, including proposals for additional airport capacity and responses to the Commission's Discussion Papers that indicated support for expansion of Gatwick are hereby rescinded.

Yours sincerely,



Airports Commission Consultation:

Gatwick Airport Second Runway, Heathrow Airport Extended Northern Runway and Heathrow Airport North West Runway

Response from Kent County Council:

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.

Surface Access

- 1.1 It is of some concern that Gatwick's second runway proposal is reliant on already planned and as yet uncommitted road and rail schemes that were intended to accommodate background growth. This extra capacity, intended for background growth, will be used up by airport related demand from the second runway.
- 1.2 When looking specifically at rail, the consultation document states in paragraph 3.26 that both planned and further uncommitted investment is needed on the Brighton Main Line to accommodate background demand growth in the 2020s. It is only if this extra rail capacity is delivered (intended to accommodate background demand growth) that there is expected to be the available capacity to accommodate passenger demand from a two runway Gatwick. However, even with the extra rail capacity there would be high levels of crowding in peak times, especially into London Bridge.
- 1.3 It is also stated in paragraph 3.26 that by the 2040s continuing growth in background demand is likely to require further investment to increase capacity on the London to Brighton rail corridor. The 2040s are likely to be a key period of growth as the airport reaches its maximum capacity by around 2050; therefore plans need to be in place to deal with this capacity issue on the Brighton Main Line otherwise there will be severe problems on this key rail corridor between London and the south coast.
- 1.4 The reliance on a single rail line to serve the airport does not provide any resilience or alternative rail routes. Together with the forecast background demand growth, it is questionable as to whether this is an appropriate rail access strategy for an airport proposed to grow to 96 million passengers per year, currently comparable to the biggest airports in the world.
- 1.5 The reliance on the London to Brighton Main Line rail corridor is further compounded by a lack of east-west rail links. There is a complete absence of a direct rail service to Gatwick from any Kent towns, e.g. Tonbridge. Kent County Council commissioned

its own study into the business case for a direct Kent-Gatwick rail service, but this showed that the service would not be commercially viable and therefore not included in the Department for Transport's new rail franchise specification. However, if the airport is serious about spreading economic benefits across the South East rather than just being focused on the London corridor, and wants to achieve its 60% modal share target for access to the airport by public transport, Gatwick Airport Ltd should look into ways of providing funding towards these types of improved rail services. Otherwise, even more traffic will be on Kent's roads and on the motorways that pass through the county as people have no choice but to access the airport by car.

- 1.6 It is disappointing that the surface access appraisal does not consider east-west rail links and how this could have positive impact on the local economic appraisal, especially to Kent, the neighbouring county to Gatwick but is not really considered in terms of potential local economic impacts. Gatwick's local economic benefits seem to be very restricted to a north-south corridor.
- 1.7 In terms of road access, paragraph 3.28 of the consultation documents states that the appraisal concludes that planned and anticipated, although uncommitted, investment on the M23 and M25 is forecast to provide sufficient capacity to accommodate growth in demand from a two runway airport. However, this conclusion is challenged following analysis of the traffic modelling results in the Jacobs report 'Appraisal Framework Module 4 - Surface Access: Gatwick Airport Second Runway Final for consultation' (5th November 2014). Table 14 in that report clearly shows that demand on south-western sections of the M25 between junctions 7 and 10 will exceed 100% capacity by 2030 from background demand growth and demand from a single runway airport.
- 1.8 The model results in Table 14 show that the vehicle to capacity ratio (VCR) is made even worse with a two runway airport, for example, for trips to the airport between junctions 8 and 9 it will increase from 104% over capacity with a single runway airport to 108% over capacity with a second runway. This will therefore further degrade journey time reliability as levels of congestion worsen on this key part of the national strategic road network. Even though the proportion of airport related traffic from a second runway is minimal in comparison to the background growth; there still needs to be significant capacity enhancements to cater for that background growth (and the airport related proportion of that demand). This is needed in order for the network to function for all road users and provide reliable access to the airport (with or without a second runway). Therefore by 2030, additional capacity does need to be provided on the M25 to accommodate both background demand growth and to support the growth of the airport.
- 1.9 It should be noted that the extra capacity that has been created and included in the Core Baseline of the appraisal, for example, the extra lane on the south-eastern section of the M25 between junctions 5 and 7 from converting the hard shoulder for

permanent running, was intended to meet background demand growth without consideration of the extra demand generated from a two runway Gatwick Airport. This extra capacity, which was intended to relieve existing levels of congestion and accommodate future background demand growth, will now be absorbed by the additional airport related demand from the proposed second runway.

- 1.10 As the appraisal concluded that there is likely to be sufficient capacity on the strategic road network, no costs were assigned to any network capacity enhancements. However, this conclusion is challenged and the costs of the capacity enhancements to the M25 on the south-western section (junctions 7 to 10), and ideally the south-eastern section as well (junctions 4 to 7), need to be established and added to the total cost of the project. The airport cannot function if it cannot be accessed efficiently due to congestion on the strategic road network, therefore, regardless of whether the capacity exceedance is due to the airport or not, extra capacity is needed to allow efficient road access to airport and to accommodate background demand growth. The costs of these improvements must be considered in the appraisal.
- 1.11 The issue of reliance on a single motorway connection (the M23) is stated in the Jacobs report as a concern by the Highways Agency as when a major incident closes the motorway there is no alternative. In similar way to the reliance on a single main line for access by rail, this is a serious shortcoming in the proposal to expand Gatwick.
- 1.12 As well as the strategic road network, there are likely to be additional traffic impacts upon local roads, in particular, the more characteristic rural lanes that cross the High Weald Area of Outstanding Natural Beauty (AONB) referenced in the AONB Management Plan. The additional traffic will also have wider implications such as air quality impacts and its impacts on people. The AONB Management Plan has targets (which have been adopted by Kent County Council) for improved transport sustainability. Therefore Gatwick's public transport offer should include provision of enhanced local bus services to towns across the High Weald AONB.
- 1.13 Comparing Gatwick's proposal with the two shortlisted options at Heathrow; as the Commission's analysis makes clear (stated in paragraphs 3.76 and 3.131), there are two major step changes in rail access which will occur regardless of whether Heathrow gets another runway or not. These are Crossrail and the HS2 connection from Old Oak Common. Crossrail will expand direct rail access from a range of destinations within and outside of London. The HS2 Old Oak Common link will provide rail access to the Midlands and the North.
- 1.14 In addition, Western Rail Access, which is also likely to happen regardless of a new runway, will provide direct rail connections to the West, e.g. to Reading and allows passengers from the west of the UK to access the airport without needing to

interchange at Paddington station. The surface access strategies for both Heathrow options also include the proposed Southern Rail Access link to Waterloo. The appraisal concludes that although the airport will remain heavily reliant on the Great Western Main Line, an increasing variety of rail links, including the London Underground (Piccadilly Line), improves the resilience of rail access to Heathrow. This is unlike Gatwick, for which rail access is reliant solely on the Brighton Mainline.

- 1.15 In terms of road accessibility, the appraisal concludes that the majority of the strategic road improvements proposed to support the expansion of Heathrow are actually already needed even without a new runway; therefore airport development would bring forward the delivery of those schemes.
- 1.16 Clearly M4 widening and placing the M25 in tunnel are major obstacles that need to be overcome. It is urged that the western section of the M25, one of the busiest roads in the country, also gets a capacity upgrade when it is diverted into a tunnel below the proposed runway. Table 14 in the Jacobs report 'Appraisal Framework Module 4 - Surface Access: Heathrow Airport North West Runway - Final for consultation' (5th November 2014) shows that junctions 10 to 15 of the M25 exceed 100% the VCR from background growth only in 2030. Although this is made only marginally worse by including airport related demand from a two runway and a potential 3 runway airport; nevertheless, these capacity issues on the M25 need to be addressed to facilitate both non-airport trips and provide access to the airport via the national strategic road network.
- 1.17 The Jacobs report describes the impact of the additional runway as only a "*minor cause*" of the additional traffic and so there is "*no compelling case for the airport to be responsible for improvements to the network in these areas*". However, if congestion on the strategic road network inhibits passengers' ability to access the airport, this is a severe impediment to the airport's growth. Airport expansion should therefore take account of the limitations of the surrounding road network and work with the relevant public infrastructure body to enhance the network so that surface access to the airport is provided to an acceptable level.
- 1.18 However, in comparison with Gatwick, Heathrow's proposed expansion coincides with major step changes in rail access, e.g. HS2 and Crossrail, which are already planned; and road improvements that are needed anyway will be brought forward by the development of a new runway at Heathrow. In contrast, Gatwick is reliant on a single railway line and motorway with planned and further uncommitted schemes needed to cater for background growth providing sufficient capacity for airport related demand only until the 2020s; thereafter further investment will be needed in strategic surface transport infrastructure.

Strategic Fit

- 1.19 Heathrow is already operating at full capacity today, therefore providing capacity elsewhere, i.e. at Gatwick, will not solve the problem that currently exists at Heathrow. Heathrow is the UK's 'hub' airport and a second runway at Gatwick giving London two airports each with two runways, is likely to result in a sub-optimal solution for the UK's connectivity needs. The UK needs a strong 'hub' airport to connect to a range of markets, especially long haul "business" destinations in the emerging markets of the world economy – Brazil, Russia, India and China (BRIC countries). As stated in the consultation document, 84% of London's long haul market is at Heathrow, whereas Gatwick serves predominately short haul European destinations as demonstrated by the dominance of a low-cost carrier.
- 1.20 British Airways (BA) is committed to one hub at Heathrow and the major network airlines are all located there having invested in alliance specific terminals with Oneworld at Terminal 5, Star Alliance at Terminal 2 and SkyTeam at Terminal 4. It is unlikely these alliances would move their operations to Gatwick as only airlines that at the moment cannot get a slot at Heathrow look to the West Sussex airport as an alternative. The recent example of Vietnam Airlines moving from Gatwick to Heathrow demonstrates the continuing need for transfer passengers at a 'hub' airport to make the majority of long haul destinations viable. Long haul services in 'hub-busting' aircraft from an expanded Gatwick are only likely to be on the 'thickest' traffic routes; while new services to emerging markets are likely to still be dependent on pooling together transfer passengers.
- 1.21 Additional capacity being provided in the wrong location will not yield the optimal result for the UK's connectivity requirements. Stansted is an example of this as it remains half empty despite the capacity constraint at Heathrow. If creating capacity elsewhere was the answer to Heathrow's problem then Stansted with its spare capacity would be filling up with legacy airlines. There is no guarantee that with a doubling of capacity at Gatwick, airlines would switch their operations to where there is excess capacity. Gatwick may have a genuine business case for expansion to meet its own needs, however, to address the capacity constraint at the UK's principal 'hub' airport; capacity needs to be provided at Heathrow.
- 1.22 The potential for growth in air freight, vital for the modern UK economy, is limited at Gatwick due to the dominance of low-cost carriers which require quick turn-around times to minimise the time spent out of the air and do not include 'belly-hold' freight as a significant part their business model. As a result, cargo facilities at Gatwick are limited and as stated in paragraph 3.20 of the consultation document, any significant growth in the cargo sector at Gatwick would require significant investment in freight handling and forwarding facilities. In contrast, given the customer base of Heathrow with legacy carriers requiring 'belly-hold' freight for the viability of many long haul routes, expansion of Heathrow is likely to be highly beneficial to the air freight sector.

Therefore expansion of Heathrow would be more beneficial to the UK's economy in terms of air freight.

Economy

- 1.23 In terms of the economic impacts, expansion of the UK's 'hub' airport at Heathrow has the potential for greater economic benefit to the UK economy. The consultation document describes that the macro-economic assessment indicates that the wider economic benefits of expanding Heathrow, through either option, could have a GVA/GDP impact of between £101bn and £214bn (in present value 2014 prices) by 2050 depending on the growth scenario. This compares to a far lower range of £42bn to £127bn with expansion at Gatwick.
- 1.24 Kent appears to derive very little direct economic benefit from Gatwick despite its relatively close proximity to the airport. The West Kent districts of Sevenoaks, Tunbridge Wells and Tonbridge and Malling do not even feature in the appraisal's study area for 'local economy' impacts. Part of the reason is due to transport from Kent to Gatwick being poor, with road access dependent on the M25 with its congestion problems and unreliable journey times; and rail services being long and indirect via London due to an absence of east-west rail connectivity via Tonbridge and Redhill. As result, there is very little 'spill-over' of direct economic benefits to Kent from Gatwick despite its relatively close proximity to the county. As previously stated, Gatwick's 'local' economic impacts are very much focused on the north-south corridor from London to the south coast.
- 1.25 The lack of direct economic benefit to West Kent towns despite being in close proximity to Gatwick is exemplified by Edenbridge. The town is very near to Gatwick and suffers from aviation noise but appears to benefit little from business opportunities or jobs for young people associated with the airport. Gatwick's own analysis states that less than 1% of its work force is from any of the three West Kent districts of Sevenoaks, Tunbridge Wells and Tonbridge and Malling.
- 1.26 Gatwick Airport Ltd should be engaging with schools and colleges in West Kent to make young people more aware of the jobs and careers that are available to them through working at the airport. Local transport improvements to the airport are also needed so that these opportunities can be accessed by West Kent's communities. Local businesses need to be made aware of the opportunities, both through the supply chain and the benefit of access to global markets from being located near to a major international airport. Gatwick could also do more to promote the attractions of West Kent to overseas visitors passing through the airport so as to encourage visitor spend in the local area.
- 1.27 There is of course likely to be a trickle down of economic benefits to Kent from an expanded Gatwick. However, as previously stated, the Commission's own analysis shows that the wider economic benefits of an expanded Heathrow would yield far

greater net benefit to the UK; and therefore likely a greater overall benefit to the Kent economy as a whole.

Cost and Delivery

- 1.28 The investment required to deliver a second runway at Gatwick will result in airport charges rising from the current £9 per passenger to between £15 and £18 with peak charges of up to £23 according to the Commission's analysis (paragraph 3.41 of the consultation document). While it is acknowledged that this is lower than the potential charges for expansion at Heathrow, Gatwick would lose its competitive advantage as peak charges of over £20 (Heathrow's existing charge) would result in a two runway Gatwick being as expensive as a two runway Heathrow (assuming Heathrow does not expand if the second runway at Gatwick is given approval). Gatwick's principal customers, low-cost carriers, may choose to relocate operations to airports with lower charges, e.g. Stansted, as Gatwick's offer no longer meets the needs of the low-cost business model.

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 options and their impacts are summarised in section three.

Master Plan – mixed mode operations

- 2.1 Gatwick Airport Ltd's proposal for a new runway with fully independent operation, i.e. independent mixed mode (both runways used for departures and arrivals); provides the maximum amount of additional capacity in terms of aircraft movements and passengers. However, it also has the most detrimental environmental and noise impacts with no opportunity for respite from runway alternation (one runway used for arrivals while the other runway is used for departures).
- 2.2 Mixed mode operation has never been accepted as a way to increase runway capacity at a two runway Heathrow, therefore it is unacceptable that mixed mode operations are an integral part of Gatwick's proposal for a two runway airport.
- 2.3 Mixed mode operations at a two runway Gatwick will subject West Kent to two parallel arrivals streams throughout the whole day, and potentially through the night as well if night flights continue to be permitted, with no opportunity for respite from runway alternation. Coupled with the concentration of flight paths through the use of precision navigation from the implementation of the Future Airspace Strategy, the noise disturbance would be intolerable.
- 2.4 The number of air transport movements is forecast to more than double from 251,000 in 2013 to up to 560,000 in 2050 with a second runway; and almost a

tripling of passengers from 35 million passengers per year in 2013 up to a capacity limit of 96 million by 2050. This will transform Gatwick into an airport larger than Heathrow currently is in terms of both passenger numbers (72 million) and air transport movements (a planning cap of 480,000 movements).

- 2.5 If Gatwick is to be permitted to expand to a size comparable (or larger as proposed) to Heathrow, then a similar level of restriction on operational practices should be put in place to give people living under its flight path some form of protection. This should include the use of the runways only in alternating mode so that areas under each runway's arrival and departure routes get respite during the day from runway alternation.

Noise – night flights

- 2.6 Residents, who have to tolerate noise from aircraft over-flight all day long, should not also have to suffer at night with sleep deprivation and suffer the consequences of ill-health as a result. Ideally night flights should not be permitted other than in exceptional circumstances. Or at the very least, the number of flights permitted at night should be reduced to at least the level currently permitted at Heathrow. The number of permitted night flights at Gatwick compared to Heathrow is almost three and a half times greater in the summer and will be maintained at this level until 2017, due to the Department for Transport's (DfT) insistence on keeping the existing night flying regime for Heathrow, Gatwick and Stansted.
- 2.7 Any consideration of a second runway should be coupled with strict restrictions on the scheduling of night flights with a quota of minimal permitted movements.

Q3: Do you have any comments on how the Commission has carried out its appraisal? The appraisal process is summarised in section two.

- 3.1 No comments, the Commission has carried out a thorough appraisal.

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

- 4.1 Comments on factors that are considered to have not been fully assessed are related to the appraisal of specific topics and therefore are provided in response to the subsequent question.

Q5: 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? (section three)

Environment – Noise

- 5.1 The Commission's interim report's recommendation for the creation of an independent aviation noise authority was welcomed as a step in the right direction towards addressing the lack of trust between communities affected by aircraft noise and the aviation industry.
- 5.2 This type of body is also needed to address the issue of the inadequate way that aviation noise is measured. In response to the Commission's discussion paper on noise in September 2013, Kent County Council emphasised that the method of measuring noise by use of the current 'average' LAeq metric does not accurately reflect how people experience aircraft noise. People's experience of aircraft noise is dependent on the volume of noise of each passing aircraft and the number of noise events experienced during the course of a day or night. The current use of the 57 decibel LAeq noise contour for measuring the onset of "*significant community annoyance*" (as defined in the Aviation Policy Framework) does not show the number of people who are impacted by noise from arriving aircraft many miles from the airport, such as the large parts of West Kent that are under the approach paths to Gatwick.
- 5.3 Kent County Council was therefore extremely disappointed by the Government's response to defer making a decision on whether to set up an independent aviation noise authority until after the Commission finishes its work this summer. This is action that needs to be taken now, regardless of where new runways are recommended.
- 5.4 It is welcomed that the appraisal used other methods of measuring noise which included the 'number above' ('N') contours which is a measure of the number of aircraft movements that exceed a threshold decibel level. The frequency of aircraft movements rather than the 'average' noise level has long been a concern across West Kent. However, use of the N70, i.e. number of aircraft movements that exceed 70 decibels, for the daytime measure and N60 (number above 60 decibels) for the night time measure, still omits most of West Kent from consideration of the noise impacts.
- 5.5 It was welcomed that the Kent settlements of Chiddingstone, Edenbridge, Hever and Marsh Green were included in the study area in the Jacobs report ('5.Noise: Local Assessment, November 2014'). However, the N70 contours do not impact these areas despite being under, or within close proximity to, the indicative flight paths of the proposed two runway airport. These areas are already impacted by aircraft noise

from constant over-flight into Gatwick as a single runway airport. This is causing considerable distress to these communities and the situation is unacceptable to Kent County Council. For the appraisal to not even register these areas as impacted from either the existing runway or the proposed new runway is of extreme concern in terms of how aviation noise impacts are still being judged.

- 5.6 The use of 70 decibels as the threshold to record the number of incidences above this level is flawed. It is based on standards in Australia developed for Sydney airport; therefore it is questionable as to whether the 70 decibel level is appropriate for the rural areas surrounding Gatwick. Lowering this threshold to between 50 to 60 decibels for a single noise event would show that there are a significant number of flights across West Kent with noticeable noise impacts.
- 5.7 The more sensitive N60 measure, used for night time noise, does indeed show that the parts of Kent within the modelled area are within the contour of '25 to 50 events in an average annual night that exceed 60 decibels' with Gatwick's existing single runway configuration in 2030 (the 'do minimum scenario'). Given that the airport is already approaching its capacity limit in its current single runway configuration, it can be assumed that this is also already the case in the present day.
- 5.8 The upper end of this range equates to an average of more than one flight every 10 minutes throughout the night time period (23:00 to 07:00). This is an unacceptable situation and many residents of West Kent (also those that are far outside of the contours which only encompass more than 25 events per night) are being deprived of uninterrupted sleep; and therefore are at risk from the adverse health effects that sleep deprivation brings. Kent County Council has argued in response to the DfT consultation that the number of night flights permitted at Gatwick should be reduced to at least the lower number permitted at Heathrow.
- 5.9 The Jacobs study shows that with a second runway the N60 contours decrease in size and thus Kent is no longer within the '25 to 50' N60 contour. This is based on the assumption that there will be fewer flights at night due to the extra capacity created that can now be used in the daytime. This change is also reflected when plotting night noise contours the more traditional LAeq 8 hour metric. However, is there any evidence to suggest airlines will chose to reduce usage of the airport at night? The business model of low cost airlines (Gatwick's main customer) requires the maximum amount of aircraft rotations and therefore utilisation of all available operational time during the day and night.
- 5.10 Furthermore, long haul services often require take-off and landing slots at night in the UK due to the time difference at the origin or destination; and Gatwick's growth with a second runway will be involve more long haul services. Operational restrictions in the form of night movement limits and/or quotas are needed to turn this assumption of reduced night flights into a reality.

- 5.11 Regardless of the changes to the N60 contours at night, the very presence of the N60 contour in Kent demonstrates that when the lower N60 measure is used in place of the N70 contour, there are quantifiable noise impacts in West Kent. If the N60 contour was used for the daytime measure, the number of these noise events exceeding 60 decibels would be evident across the western part of the county. Aviation noise events exceeding 60 decibels are regularly experienced across West Kent and this situation would only be made worse with more flights due to a second runway.
- 5.12 Table 1 shows a snapshot of the noise experienced in Rusthall on the western side of Tunbridge Wells during a 30 minute period on a morning of westerly operations on 24 October 2014. The minute by minute measurements show noise events (Lmax) regularly exceeding 50, 60 or in some case 70 decibels in an area of background noise (Lmin) ranging from 30 to 40 decibels. When averaged out these levels of noise will not exceed the 57 decibel LAeq measure for what the Aviation Policy Framework considers to cause “*significant community annoyance*”. However, it is the number of the noise events and the noise level of each event that causes annoyance to these communities in West Kent. Long term monitoring and modelling of these areas under the approach paths to Gatwick would show that the number and intensity of aircraft noise events is high enough to cause concern.

Table 1 Noise Measurements at Rusthall, west of Tunbridge Wells

File	Aircraft noise 061816_141024_102052000....		
Periods	1m		
Start	24/10/14 10:20:52		
End	24/10/14 10:52:52		
Location	Solo 061816		
Weighting	A		
Data type	Leq		
Unit	dB		
Period start	Leq	Lmin	Lmax
24/10/14 10:20:52	55.1	39.3	61.9
24/10/14 10:21:52	51.1	37.3	57.8
24/10/14 10:22:52	46.9	39.3	54.9
24/10/14 10:23:52	46.2	36.9	56.7
24/10/14 10:24:52	47.5	39.2	52.9
24/10/14 10:25:52	53.3	38.3	58.1
24/10/14 10:26:52	58.6	43.9	69.5
24/10/14 10:27:52	54.4	44.8	61.6
24/10/14 10:28:52	49.2	39.6	58.1
24/10/14 10:29:52	42.4	39.0	47.1
24/10/14 10:30:52	41.6	34.8	49.1
24/10/14 10:31:52	56.0	35.2	69.7
24/10/14 10:32:52	57.5	36.5	71.3
24/10/14 10:33:52	58.3	34.0	72.1
24/10/14 10:34:52	61.2	34.6	72.8
24/10/14 10:35:52	46.9	36.1	55.8
24/10/14 10:36:52	58.4	37.5	71.8
24/10/14 10:37:52	46.2	35.8	55.5
24/10/14 10:38:52	39.1	35.4	43.8
24/10/14 10:39:52	40.6	36.2	47.4
24/10/14 10:40:52	61.8	36.7	70.8
24/10/14 10:41:52	49.6	39.2	56.4
24/10/14 10:42:52	44.3	39.3	52.3
24/10/14 10:43:52	45.6	40.6	51.4
24/10/14 10:44:52	59.2	43.9	71.9
24/10/14 10:45:52	60.1	41.1	67.8
24/10/14 10:46:52	44.8	39.0	54.6
24/10/14 10:47:52	45.2	39.5	50.5
24/10/14 10:48:52	53.9	37.7	66.4
24/10/14 10:49:52	49.6	36.7	55.9
24/10/14 10:50:52	49.2	40.3	59.0
24/10/14 10:51:52	42.9	39.3	45.2
Overall	54.9	34.0	72.8

5.13 It is not only rural areas that are impacted by flight paths into Gatwick. The readings in Table 1 above are from an area to the west of Tunbridge Wells. The Borough of Tunbridge Wells has a population of 115,200, of which just over half live in the urban area. Nearby Tonbridge also has a population of over 120,000 spread through the Borough of Tonbridge and Malling. However, these statistics do not appear in the

appraisal for Gatwick as they have not been modelled to be within the noise contours. Given the appraisal's emphasis on population densities and total numbers of people, these sizeable urban areas are not being incorporated into the absolute numbers of people affected by noise.

- 5.14 The appraisal's overall emphasis on population density and total numbers of people affected by noise does not therefore give equal consideration to rural areas of tranquillity with lower background noise levels. However, it is welcomed that the consultation document in paragraph 3.34 acknowledges that *"areas around Gatwick are rural and have high levels of tranquillity that would be adversely impacted by new development at the airport"*.
- 5.15 Preserving the tranquillity of these areas is not only important for the people that live in these rural communities but it is also important for the tourism economy. Visitors to the Areas of Outstanding Natural Beauty (AONB) do so for peace and quiet and AONB close to London need to be protected from noise. Nationally significant heritage tourist attractions such as Hever Castle, Penshurst Place, Chartwell and Chiddingstone Castle are also negatively impacted by aircraft noise associated with Gatwick. This not only threatens the character of these historical places but also negatively impacts on visitor numbers and tourism spend in the rural economy.
- 5.16 Whilst forming part of the Guidance within the National Planning Policy Framework (NPPF), tranquillity is also a key element of landscape. In terms of the High Weald AONB, the impacts of additional noise may have an effect on the secondary purpose of the designation, which is to promote the public understanding and enjoyment of the landscape. With additional populations and rural areas being affected by noise with the expansion of Gatwick, people's experiences of the countryside may be compromised to a certain degree. Therefore the Gatwick second runway proposal impacts upon the experiential qualities of a nationally designated landscape.
- 5.17 The indicative flight plans used for the purposes of modelling the potential noise impacts are likely to be highly inaccurate based on the issues that Kent County Council, and other councils in West Kent, have come across regarding recent operational changes that have seen aircraft join the final approach further east of the airport over the Tunbridge Wells area. The Civil Aviation Authority (CAA), National Air Traffic Services (NATS) and Gatwick Airport Ltd have always been adamant that aircraft need to be established on the instrument landing system (ILS) final approach path by at least 10 nautical miles from the airport. This requirement would therefore seem to preclude the shortened approach paths indicated for the proposed second runway with aircraft only having turned and established on the final approach over Dormansland. If these shortened approaches are possible, it then becomes a question of why this cannot be done now for the existing runway and thus avoid flying over Kent on approach.

5.18 While it is acknowledged that the flight paths in the Jacobs study ('5.Noise: Local Assessment, November 2014') are only indicative, the alignment does control the geographical location of the modelled noise contours. This is demonstrated most acutely with the Lden contours which shift further west and south with a second runway. This is based on the assumption that the new flight paths are able to join the final approach to the second runway further west than they are with the existing runway. Different flight paths more aligned to the existing requirements, i.e. joining the final approach by 10 nautical miles, would result in different noise contour maps, with likely noise impacts for the second runway further east than is currently modelled. This would give a different outcome to the noise appraisal for the second runway. Flight paths need to be confirmed so that the noise impacts of the second runway can be more accurately ascertained.

Environment –Biodiversity

5.19 The Ashdown Forest is a characteristic part of the High Weald and biodiversity (habitats and species) is a fundamental part of the landscape's character. Biodiversity could be threatened by nitrogen deposition from an increase in vehicle traffic as a result of the proposal. The potential for impacts to the Ashdown Forest Site of Special Scientific Interest (SSSI) / Special Protection Area (SPA) / Special Area of Conservation (SAC) is broadly considered within the consultation report, in terms of the potential for increased nitrogen deposition on the sensitive habitats (with reference to a Wealden District Council report relating to a proposed programme of monitoring). However, it is concluded in the report that until monitoring results are published and a reassessment of ecological impacts carried out, there would be a neutral impact on this area in terms of emissions.

Environment – Place

Archaeology:

5.20 A second runway at Gatwick is unlikely to have direct impact on Kent's archaeological remains. However, there may be a more indirect impact from enabling or related works, such as improvements to infrastructure, especially improvements to the M25, A25, A21 or A264; or improvements to services, such as upgrading water, electricity, gas, telecommunication routes. The possible impact from related proposals cannot be identified at this stage but should be considered as a general issue.

5.21 There may be impact from additional over-flight on the setting of some archaeological sites, such as Squerryes Park Hillfort, in terms of appreciation and understanding of their site and situation.

Historic Buildings:

- 5.22 Increased flight numbers, especially of low-flying aircraft on approach to Gatwick, the increase in pollution from jet fuel and increased road traffic through Kent, may have an impact on the designated and undesignated historic buildings in the county. This could be particularly the case for the historic buildings within the high status residences, such as Squerryes Court, Chiddingstone and Chartwell. The historic buildings within the villages along the A25, such as Westerham and Brasted, and along the A264, such as Ashurst, could also be affected.
- 5.23 An indirect impact could be the detrimental effect on the setting of the more isolated but high status historic buildings, especially in terms of the impact on the understanding and appreciation of medieval and post medieval components. This impact on setting and on the buildings themselves, may lead to increase in restoration and maintenance costs and decrease in income generated from tourism, wedding venues, film locations etc.

Historic Landscapes:

- 5.24 The historic landscapes could be directly affected by the increase in over-flight and more indirectly by increased road traffic. The noise from aircraft would be intrusive and have a detrimental impact on the appreciation, understanding and enjoyment on the extensive designated parklands, some of which are major tourist sites in Kent. Historic landscapes are a key part of the historic character of Kent and the tranquillity of the historic areas are valued by residents and visitors. There might also be a detrimental visual impact on the views from and towards the historic parklands located on the hills, particularly towards the northern part of the West Kent area.

Summary of 'Place' impacts:

- 5.25 Although there may be only a localised direct impact on the archaeology, historic buildings and historic landscapes from works associated with the second runway at Gatwick, there may be considerable range of more indirect impacts from the increase in air traffic and the need to improve services for Gatwick. This could range from direct detrimental impact on the fabric of historic buildings from increased air pollution, to a more indirect impact on the appreciation of the quietness of surviving medieval landscapes. Assessment of the environmental impact of a second runway at Gatwick needs to be supported by a thorough and robust assessment of the historic environment and specialist assessment of archaeology, historic buildings and historic landscapes should be part of an Environmental Impact Assessment (EIA) process.

Q6: Do you have any comments on the Commission's sustainability assessments, including methodology and results? (section 2)

- 6.1 No further comments other than the issues raised in response to the previous questions.

Q7: Do you have any comments on the Commission's business cases, including methodology and results? (section 2)

- 7.1 No further comments other than the issues raised in response to the previous questions.

Q8: Do you have any other comments?

- 8.1 **In summary**, with a second runway at Gatwick, Kent will experience negative impacts in terms of increased aviation noise from more than a doubling of aircraft movements and suffer from a lack of respite provision with the use of both runways in mixed mode operations. Aviation noise in West Kent from Gatwick's current single runway configuration is already unacceptable and a potential doubling of this impact with a second runway would be intolerable. The noise impacts will be further exacerbated by the concentration of flight paths due to the implementation of the Future Airspace Strategy. This will inflict intolerable noise on communities with every single aircraft flying a single route on approach to the airport.
- 8.2 Government policy to limit and, where possible, reduce the number of people significantly affected by aircraft noise, should not result in a preference for aviation noise being inflicted on smaller populations in rural areas. Densely populated urban areas are noisy environments, whereas rural areas have low background noise levels and therefore aircraft noise is more intrusive. The tranquillity of the countryside around Gatwick, much of it part of Areas of Outstanding Natural Beauty (AONB), should be protected for both its amenity value close to Greater London and for the people who live there.
- 8.3 The current high number of permitted night flights at Gatwick (11,200 movements, almost three and a half times more than Heathrow's permitted 3,250 in the summer season) depriving people in West Kent of a decent night's sleep and negatively impacting on health is unacceptable to Kent County Council. The recent eastward shift of arriving flights joining the final approach over the Tunbridge Wells area, which

have been focused by air traffic control into a narrower swathe, has caused considerable distress to the communities of West Kent; and this is also unacceptable to Kent County Council.

- 8.4 Significant investment in transport infrastructure is needed across the South East to cope with population growth. Although there has been investment in transport in London, the surrounding areas of the South East have not seen the level of investment required to accommodate growth. For example, in the Thames Gateway a new Lower Thames Crossing is needed to alleviate the capacity constraint on the existing crossing and help deliver housing and economic growth. The M25 is already severely congested and will require further capacity enhancements to accommodate the increased demand. Growth in London and the South East will put increased pressure on already strained infrastructure and this must be considered alongside the increased demand from airport expansion; rather than merely assessing the needs of airport surface access in isolation.
- 8.5 A lack of adequate surface transport enhancements to accommodate the additional demand from a second runway at Gatwick will result in further congestion and delay on the strategic road and rail networks. This is in contrast with the planned step changes in surface access by rail to Heathrow, specifically through the provision of Crossrail, HS2 and Western Rail Access.
- 8.6 The negative impacts of Gatwick expansion are not outweighed by the direct economic benefits to Kent, to which there is very little evidence.
- 8.7 Therefore in conclusion, **Kent County Council is opposed to the proposed second runway at Gatwick Airport.**

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3 February 2015