

WORTH

Parish Council

Clerk to the Council



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To: Airport Commission

9th January 2015

Dear Sirs,

Re: Gatwick Airport – Second Runway Consultation.

Worth Parish Council strongly oppose a second runway at Gatwick Airport.

Within the Worth Parish Council area there are two major villages: Crawley Down and Copthorne. Copthorne is one of the largest villages in Mid-Sussex and West Sussex living peaceably (until this year) with Gatwick on its doorstep. Copthorne has about 2,000 existing residences (population c. 5200). In the very near future this will increase significantly:

- a. planning permission has been given for 500 more residences and a new school to the west of the village;
- b. Wates are applying for permission to build a further 46 new homes between the above development and the village.

Copthorne's population is likely to grow to about 6,600 over the next few years entirely due to the above developments.

Crawley Down is of similar population and size to Copthorne. Planning permission has been given for over 300 houses (16% increase) since April 2011. As of April 2014, some 209 of these remained to be completed. The infrastructure is already strained past breaking point with schools and roads full.

Despite being close to Gatwick Airport and the M23, Copthorne has been a tranquil place to live. However, the recent weather patterns have meant more departures to the East and residents have been given a minor taste of the unacceptable major impact that a second runway would have on their lives.

Like other areas impacted by the increased departures to the East, Copthorne residents are complaining that the aircraft noise at times during 2014 has become intolerable. Noise is also having a greater impact on residents of Crawley Down, Domewood and Furnace Wood.

The 2012 government figures showed that the number of people suffering serious noise annoyance had gone up by 16 % - without any airport expansion¹. On the basis of anecdotal evidence, later assessments are expected to confirm this trend.

Gatwick expansion will only make the noise problem hugely worse for all these residents, as the associated indicative take-off route released by GAL clearly shows. The new flight path would take aircraft at least 1km closer to Copthorne and start their turn closer to Crawley Down and Copthorne, whilst aircraft were accelerating and gaining height - the noisiest time of a flight. Copthorne is the most seriously affected populated area to the east of the airport yet Copthorne has been

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https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/244530/lgw-2012.pdf

consistently overlooked and ignored by Gatwick Airport Limited (GAL) during consultation – belying their claims of substantive consultation and concern for local residents.

Copthorne is located approximately 1km south of the outer LAeq 54 dBA contour on current (single runway) noise contour maps. The second runway would be 1 km further south and consequently move this contour (plus associated departure routes) south by a similar amount - placing Copthorne in a belt where average noise during the day will be between 54 and 60 dBA from that runway alone. The combined effect of multilateral operation is expected to be much higher.

In 1990, following consultation, the UK Government adopted the current 16 hour (07:00-23:00) averaging basis for LAeq (DORA report 9023, 19904). It defined the 57 dBA LAeq contour as being broadly equivalent to the onset of serious annoyance. This contradicted the findings of the ANIS Study² (1985) which had concluded that a 55dBA LAeq limit “could be used to represent the onset of community disturbance”.

Studies have indicated that, since 1985 when these thresholds were assessed in an urban situation, tolerance to noise has decreased and the contribution of aircraft numbers to annoyance had increased quite markedly³. Both BS and ISO standards recommend community noise limits to be 10dB lower in rural areas than in urban – indicating that the “acceptable” threshold for annoyance in Worth Parish should be significantly less than 47dBA LAeq.

However, many authorities consider the LAeq methodology to be flawed and that a measure based on the frequency of noise events and peak noise versus average ambient would be a more accurate measure of annoyance - as would a measure which weighted annoyance according to time of day.

The EU Environmental Noise Directive (END) 2002/49/EC requires Member States to make Strategic Noise Maps for major airports within their territories and the maps should represent the annual average values. The directive is reflected in Environmental Noise (England) Regulations 2006.

The END requires the use of different parameters to those used in the current noise contours, notably

- Lday (07.00 - 19.00),
- Levening (19.00 - 23.00),
- Lnight (23.00 - 07.00),
- Leq16hr (07.00 - 23.00), and
- Lden (00.00 - 24.00).

GAL have failed to produce these and have been noticeably reticent in response to questions about noise.

4,100 homes around the airport are expected to qualify for £1,000 annual handout against council tax payments and the compensation offer is to fund sound insulation in homes, £3,000 towards the cost of double glazing and loft insulation. How can residents in a previously tranquil village insulate against noise pollution in their garden, or fund a move to an equivalent area when their property has been devalued? That, of course assumes that the 4100 houses include those in Copthorne. Something which is not at all clear from the GAL documentation.

² The 57 dBA threshold derives from the conclusions of the United Kingdom Aircraft Noise Index Study) (ANIS, 1985) which concluded that, on a 24-hour basis, “55 Leq could be used to represent the onset of community disturbance”.

³ Attitudes to Noise from Aviation Sources in England (ANASE) Final Report for Department for Transport In Association With John Bates Services, Ian Flindell and RPS October 2007
<http://www.lcacc.org/archive/07applicaddendum/Appendix%20B2.pdf>

Increased noise will also affect three schools in Copthorne. None of these schools have adequate insulation against noise, none of them have air conditioning to allow windows to remain closed. At all schools pupils need time out of doors, if possible without noise and air pollution.

With the proposed expanded airport handling more than double the present number of flights a year (i.e. rising from 250,000 to 560,000) the ANASE Study predicts a further associated increase in average noise level of 4.5 dB. There will also be increased air pollution. Add to that the increased pollution generated by the surface transport systems to carry these extra passengers and workers to the airport and you can see there will be greatly increased pollution across the whole area⁴. Copthorne is in the area surrounding the airport, which will be one of the most heavily affected.

Nearby are irreplaceable national assets such as Ashdown Forest and High Weald. The air pollution is only too visible on patios, garden paths and garden furniture and can, on occasions, be tasted by those living near the airport but the adverse effect will not only be on Copthorne, Crawley Down and Worth Parish it will also affect Ashdown Forest and other ancient woodlands. Natural England have admitted that there has been environmental damage to Ashdown Forest but they have not been measuring it. The damage to Ashdown Forest will be exacerbated by additional housing, more vehicle movements to the airport area for work or travel and the increase in traffic seeking to avoid the airport area. GAL have largely ignored these issues. Worth Parish Council would argue that the precautionary principle should be applied and a rigorous assessment of the cumulative effects be performed prior to any decision.

Gatwick Airport Limited says only 163 houses will be pulled down - presumably those on or approaching Balcombe Road and within the boundary of the expanded airport footprint. Nobody wants houses pulled down, but far more homes will be blighted by noise and pollution. The second runway flightpath means all houses in Copthorne will be severely blighted and many in Crawley Down, Domewood and Furnace Wood, arguably the blight impacts are already being felt.

The infrastructure plans proposed by GAL are inadequate on all fronts, being predominantly inward looking and reliant on the unfounded assumption that they can convince the majority of their customers to use public transport. The reality remains that the majority will continue to use private transport.

An upgrade to the Brighton to London rail line is proposed as the fundamental transport link, with minimal road infrastructure. This is already one of the busiest commuter lines in the country. Currently trains run pretty much full from 06:30 to 10:00 and 16:00 to 20:00. Clapham Junction and East Croydon are bottlenecks currently operating at or over capacity. Any improvements to the service are likely to be countered by city workers moving out of London to more affordable housing – an effect already being experienced in Redhill and Horley, where schooling has become an issue.

The East-West travel options are severely limited - being served by poor quality diesel-rail cross-country branch lines via Redhill or road journeys carried on the A25, A264 or M25. The latter needs planned investment just to remain moving, the A264 is at a standstill during rush hours with the Copthorne Hotel roundabout operating at 138% of capacity, WSCC Highways have previously concluded that the A264/M23 junction cannot be further improved and yet allowed planning permission for 500 homes with sole access via the A264/M23 link road.

⁴ "A short-term intervention study - Impact of airport closure due to the eruption of Eyjafjallajökull on near-field air quality", David C. Carslaw; Martin L. Williams; Benjamin Barratt. Atmospheric Environment, Vol 54, July 2012, pages 328-336.

In its paper of 15th May 2014 MSDC stated:

"The current proposals focus exclusively on improvements to junction 9 of the M23 and already programmed works. Increased traffic on local roads will need to be mitigated including:

- the M/A23, especially junction 10, but also the need for three lanes along its whole length from the M25 to the A27;
- M25 anticlockwise exit onto southbound M23;
- The M23- M25 link with Heathrow;
- East / west routes in general, but especially
 - the A264 east bound from M23 J10 has major bottlenecks at Felbridge then onto A22 at East Grinstead;
 - the C319 through West Hoathly and Sharpthorne;
 - A272 from Winchester to the A22 at Maresfield;
- the B2028 through Crawley Down, Turners Hill, Ardingly and Lindfield."

Worth Parish Council would fully endorse the above and also suggest that both junctions 9 and 10A of the M23 would need to be upgraded to full junctions, with junction 9 connecting to the A22 to specifically provide improved East/West connectivity. The £46M contribution to local infrastructure proposed by GAL would not even scratch the surface of these basic requirements.

For local residents buses are infrequent and inadequate for most work journeys and they get caught in the busy traffic. There are no safe cycle routes from villages to the nearest stations at East Grinstead and Three Bridges. With minimal local rural employment Sussex residents generally commute to work, most by road or rail. The extra congestion will adversely affect their journeys.

The Crawley Down Neighbourhood Plan recognizes the economic threat posed by congestion on the A22 and A264 effectively isolating the village from its main employment base and thereby potentially making it unviable as a working community. Traffic proposals under consideration by the Crawley Plan are likely to cause further isolation.

A comprehensive transport study for East Grinstead from consultants JUBB has recently been commissioned by David Peacock of Barredale Court, Turners Hill Rd. He has given permission for it to be referenced.

This study reviewed and updated the Atkins Transport Study for East Grinstead (2011) against a November 2014 baseline. Key findings of this comprehensive report were that:

- Traffic conditions are severe and demonstrably unacceptable.
- Conditions predicted by Atkins for 2021 have already been exceeded
- It is inappropriate to allow further unplanned major development until the required and substantial additional highway provision is in place.
- This has a direct bearing on the future level and particularly the timing of housing provision in East Grinstead."

The report also noted severe congestion at the A264 Dukes Head roundabout as well as along the length of the A22 and Felbridge traffic lights. Although all points could equally be argued for Crawley Down and Copthorne the third point has a particular resonance. Traffic is already strangling the area and, unless addressed could kill it. Gatwick does not offer a solution, only unsupported and unwarranted assertions.

The local area in Sussex will not see any positive step change in economic benefit and may well see a downturn in many existing businesses. Employment levels are near full without the expansion so new jobs will increase competition for staff between employers, thereby forcing up business costs, have to draw in workers and increase numbers of local homes to house them. Whilst airport expansion would provide additional employment, there has been concern expressed that it would lead to loss of business premises currently located near the airport. The new runway alone would require the demolition of 286 business premises. Expansion and demand for labour could also lead to a labour shortage for other businesses in what has traditionally been a low unemployment area.

Further, as any good businessman will appreciate, allowing one supplier/customer to dominate a business creates a significant risk – any fluctuation in third party fortunes being greatly amplified in the business. Gatwick would dominate the area and relatively minor adverse fluctuations there potentially cause much greater adverse economic consequences elsewhere in the district, as the example of St Louis illustrates.

There are very few flats or affordable homes available locally. Most of the jobs at Gatwick Airport will remain minimum wage so housing will need to be provided by housing associations or those workers will need to commute, putting extra pressure on local road and rail networks. Consultants commissioned by the West Sussex County Council and the Gatwick Diamond Initiative concluded that the new jobs created by a new runway would create a need for 30,000 – 45,000 new houses. GACC analysis suggests 40,000. Where could an extra 30,000 - 45,000 homes be built without destroying the beautiful county of West Sussex? How will other amenities such as schools, doctors' surgeries and hospitals, already overstretched, be able to cope with the influx of new workers and residents? Crawley has a current housing waiting list of 3000 and no space to expand further, Mid-Sussex is having difficulty meeting current targets (with adjacent authorities pressing for it to take even more), could West Sussex cope with the overflow?

GAL suggest in their application that without a second runway Gatwick will somehow contract. That is patently untrue. Without a second runway Gatwick will still expand to a position where it is possibly near capacity, it could presently accommodate a 50% increase in flights. As aircraft increase in size that will mean many more passengers for the same number of flights. It will remain a significant local employer and significant entry port for visitors to and from the UK it will certainly not become a fading force. The hinterland of the Gatwick Diamond will continue to grow and create wealth with greater ease of movement locally than with a second runway. That business diversity making the local economy more resistant to economic fluctuations.

As John Mann (chairman of the Treasury Select Committee) said of GAL in December 2013:

"It seems that this company has under-invested in contingency planning – despite raking in hundreds of millions of pounds of profits and ruining Christmas for hundreds of people.

'It seems like they have been caught unprepared – and this is at a time when they are arguing for expansion.

The same lack of planning and selective blindness would seem to be implicit in their proposals for a second runway.

Without a second runway Gatwick would not cause the scarring of Surrey, Sussex and the South-east with the massive infrastructure and housing developments that would be needed for a second runway. With a second runway it is also entirely plausible that Gatwick would not achieve business targets - with lower cost airlines

moving to Stansted or Luton where there is capacity and landing fees would be cheaper and Gatwick failing to attract the larger airlines away from Heathrow. Gatwick owners (Global Infrastructure Partners (GIP)) have the sole intention of gaining permission for a second runway and then selling on - leaving local authorities to deal with the issues created.

We would ask you to note that, despite Gatwick having sufficient capacity to take on additional flights now, major airlines still prefer Heathrow. There is a reason for that – their customers want it. A second runway at Gatwick is unlikely to change that fundamental issue. Has anyone asked the airlines which they would prefer and why? Willie Walsh (CEO of IAG) has said that IAG do not consider that there is a business case for Gatwick second runway, and that they would not be prepared as a significant operator at Gatwick to see charges increase, concluding that it's "not going to be an attractive environment for airlines". The CEO of Easyjet has also expressed concern at the implicit prospect of increased charges.

Worth Parish Council believes the protection of rural Sussex and associated economic viability is of far greater importance than the expansion of GAL and associated profit for GIP shareholders when they sell on.

Yours faithfully

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[REDACTED]
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Also copied to:

West Sussex County Council

Mid-Sussex District Council

Francis Maude MP.