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Airports Commission Consultation
PO Box 1492
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Our ref: P&R/Aviation
Date: 29 January 2015

Dear Sir,

Airports Commission Consultation Document November 2014

Thank you for the opportunity to comment on your assessment of runway options in the South East.

Reigate & Banstead Borough is located directly to the north of Gatwick Airport. Key transport corridors to the airport pass through the borough (the London to Brighton Mainline and the A23/M23, and the North Downs Line and the M25). Nearly 10% of those employed directly by the airport live in Reigate & Banstead (around 2000 people). And in the southern part of the borough in particular (including the town of Horley) there is a concentration of firms that support or are related to the presence of the Airport.

What happens at Gatwick Airport is therefore highly relevant to the future of, and development within, Reigate & Banstead Borough.

Reigate & Banstead Borough Council has decided not to support or object to a new second runway at Gatwick airport. We recognise that this is a decision which will be driven by national political and economic considerations. Our position is that - whatever the final decision on the location of additional runway capacity - we work to ensure that the maximum benefits are secured for our residents and businesses, whilst at the same time the inevitable negative impacts are minimised.

Annex 1 to this letter sets out our detailed response to the questions raised in your consultation document. Annex 2 includes a list of additional infrastructure and

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avoidance and mitigation measures that we consider would be necessary if a second runway at Gatwick Airport were to be given the go-ahead.

In this covering letter I would like to highlight the following points:

Outstanding Technical Assessment Work: More detailed appraisal is required in relation to a number of issues that have the potential to impact directly on Reigate & Banstead Borough and our residents. These include: the interventions needed to avoid downstream flood risk; air quality dispersion modelling; investigation of east-west strategic surface access and measures required to secure transport network resilience; and the impact of additional traffic on the wider local road network.

In addition, it is important that an analysis is undertaken of the impact on Gatwick Airport and the surrounding area if additional runway capacity is provided at Heathrow Airport and not at Gatwick Airport.

It is vital that all this work is completed as soon as possible and interested parties are given the opportunity to comment on the findings.

Avoidance and mitigation measures: Development of any second runway at Gatwick Airport must be conditional on the provision of appropriate avoidance and mitigation measures to overcome the inevitable negative impacts (as identified in Annex 1). Positive measures and interventions to maximise the opportunities associated with airport expansion must be focused to benefit those most likely to experience negative impacts of growth (ie those living closest to the airport). The provision of these measures must be binding on the airport developer. There must be clear mechanisms to fund and implement them, and they must be provided in advance of (or alongside) the runway becoming operational.

Infrastructure investment: Should the Commission be minded to recommend a second runway at Gatwick Airport, this should be conditional on the infrastructure required to support the development being fully funded and delivered in a timely manner. The provision of infrastructure directly related to any new runway must be binding on the airport developer. There must also be a cast-iron commitment from Government to fully fund the infrastructure necessary to deal with existing infrastructure capacity issues and background growth, as well as the future indirect growth that would occur as a result of airport expansion.

Strategic planning: Any decision to locate a second runway at Gatwick Airport will have considerable implications for those authorities that surround the airport. There must be a clear mechanism established for appropriate strategic planning across the area to deliver the development needs associated with any new runway provision, including housing and business growth and supporting strategic infrastructure. Local authorities are in the unique position of having both the in-depth local knowledge and professional expertise to plan for the future of the area, and must be central to this process.

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Community involvement: Effective and ongoing engagement with local communities and local authorities will be vital in the event that the decision is taken to locate an additional runway at Gatwick Airport. We therefore strongly support the National Planning Statement and Development Control Order route to a final decision. This will allow for maximum public scrutiny of proposals and greatest community involvement.

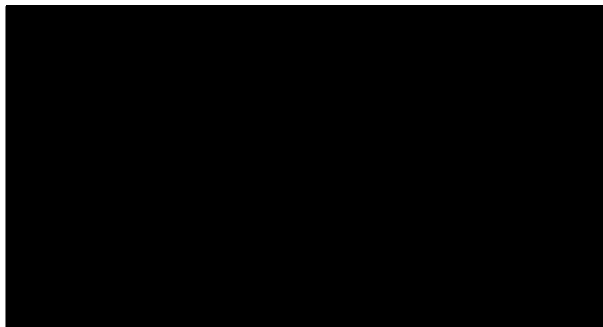
In summary we would ask that if the Commission is minded to recommend Gatwick Airport as the preferred location for additional runway capacity in the South East, it does so:

- (a) recognising that this is conditional on measures to avoid and mitigate the negative impacts of expansion and deliver positive benefits to those local communities most affected; and
- (b) supporting the unique position of local government to be able to plan for and manage the impacts of airport expansion on local communities.

Reigate & Banstead Borough Council is committed to continuing to work with our neighbouring local authorities, and local MPs, to develop a more detailed understanding of the growth implications of any second runway at Gatwick Airport and the avoidance and mitigation measures, and infrastructure interventions, that would be required to support it.

If your Commission has any questions about our response, or would like the opportunity to discuss any of the issues raised in more detail, please do not hesitate to contact me.

Yours faithfully,



Annex 1

Response to Airports Commission consultation questions

Question 1. What conclusions, if any, do you draw in respect of the three short-listed options?

1. Our comments relate to the proposals for Gatwick Airport. We have no comments to make on the Heathrow Airport shortlisted options.
2. Reigate & Banstead Borough Council has decided not to support or object to a new second runway at Gatwick airport. We recognise that this is a decision which will be driven by national political and economic considerations. Our position is that - whatever the final decision on the location of additional runway capacity - we work to ensure that the maximum benefits are secured for our residents and businesses, whilst at the same time the inevitable negative impacts are minimised.
3. Having considered the Commission's consultation material, we have some concerns both in relation to the appraisal work undertaken to date and the avoidance and mitigation measures proposed in the event of a new runway at Gatwick Airport.

Question 2. Do you have any suggestions for how the short-listed options could be improved, i.e. their benefits enhanced or negative impacts mitigated?

4. Our response to this question is based around our expectation that - to use the Airports Commission's own terminology - the 'bundled' effect of positive impacts and negative impacts of a new runway should result in a neutral or positive impact on communities within Reigate & Banstead and other local authorities in proximity to the airport. We feel strongly that **further measures would be required in order to enhance the local benefits of any second runway at Gatwick Airport and mitigate the negative impacts**. We summarise these measures in Annex 2.
5. It is important that these measures would be focused such that they provide benefits to those **most likely to experience negative impacts** from airport growth (ie those living closest to the airport).
6. It is also important that **all measures to enhance the benefits, or mitigate the negative impacts, of a second runway at Gatwick Airport are binding** on Gatwick Airport Ltd (GAL) or any future airport owner/developer. **Clear mechanisms to fund and implement them** must be developed and **all measures must be provided in advance** of, or alongside, any new runway.
7. We have identified a number of specific areas where we consider the Gatwick second runway shortlisted option needs to be improved.

7.1 Employment

- 7.1.1 The top end of the Commission's direct jobs forecast is considerably higher than that suggested by GA). By 2050, the Commission project total direct, indirect and induced jobs could be as high as 32,600 by 2050 (compared with GAL's estimate of 22,000). One of the labour sources identified for this new employment growth is unemployed people across the wider Coast to Capital Area.

7.1.2 We welcome GAL's commitment to establish a £3.75m training fund to help create 2,500 apprenticeships for local young people in the event of a new runway at Gatwick. This is based on their own estimates of job growth but we consider that this 'pledge' should be directly linked to the number of new jobs that would be generated at the airport. That is, that **in the event that employment growth (including construction employment) is higher than estimated by GAL, the investment in training and apprenticeships is increased proportionally**. We feel strongly that this investment should not only be targeted at large centres such as Croydon and Brighton by also **targeted at the area immediately surrounding the Airport** to help contribute to an overall gain in the local quality of life (taking into account the range of benefits and disbenefits of a second runway).

7.1.3 If new jobs created (particularly lower skilled jobs) are to be filled by people currently unemployed from across the Coast to Capital area, the reality of their ability to access these jobs needs to be considered (for example, their ability to afford transport to the airport). Consideration therefore also needs to be given to **other incentives to attract lower skilled workers from further afield**, for example subsidised transport.

7.2 Surface Access

7.2.1 The Commission concludes that – subject to investment to allow the transport network to accommodate background growth – sufficient road and rail capacity will be achieved until around 2040 to accommodate growth in passengers and vehicles associated with any second runway at Gatwick Airport.

7.2.2 In our response to Question 5 and 6 we identify additional areas of work in relation to surface transport that we feel are required. As a general point, it is critical that no second runway at Gatwick should be approved without **a clear and legally binding commitment from the relevant parties to fund and deliver extended baseline schemes** necessary to deal with background growth and specific measures associated with airport expansion.

7.2.3 Rail:

- i. Brighton Mainline: It is critical that no second runway at Gatwick Airport should be approved without **a commitment to deliver the currently uncommitted and unfunded improvements to the Brighton Mainline identified by the Commission** (the 'extended baseline'). Without these measures, the Commission's own consultants conclude that passengers would experience severe overcrowding on services in the peak hour, with some non-airport passengers being unable to board services. In the event of a new second runway at Gatwick Airport, the Commission identifies that by the 2040s additional interventions (over and above the extended baseline) will likely be required to increase capacity and that this will require significant investment. It is therefore vital that there is **an early commitment to fund and deliver the required longer term (post 2030) enhancements on the Brighton Mainline** should a second runway at Gatwick Airport be the chosen option.
- ii. North Downs Line: Most of the Commission's assessment is concentrated on north-south rail links. We share the concerns of Surrey County Council that this is simplistic, and fails to consider the important role played by the North Downs Line, which provides east-west rail links, and could help provide public transport network resilience, but even now experiences capacity issues. We would expect further assessment to determine the **upgrades to the North Downs Line** that would be required. These need to be **included in the extended baseline list of schemes with a commitment to deliver these improvements** prior to new second runway becoming operational.

7.2.4 Road (strategic):

- i. M25: The Commission identifies that congestion on the southern sections of the M25 (as a result of background growth) is a concern to all short-listed options. It is therefore vital that, beyond current identified improvements, **the issue of future M25 capacity is resolved by the Government** prior to any new runway becoming operational. Our own work has identified **the need to improve Junction 8 of M25** to accommodate background growth levels and we urge that this is added to the list of extended baseline schemes.
- ii. M23/A23 Hooley interchange: The Commission's conclusions that the implementation of identified extended baseline schemes will provide sufficient capacity on the strategic road network to accommodate growth in road traffic generated by any second runway fails to take into account the capacity limitations associated with the Hooley Interchange. This junction is located in the northern part of Reigate & Banstead Borough. The A23/M23 route is particularly important given the Commission's conclusions that (a) the majority of traffic to the airport will approach from the north, and that (b) Croydon provides a potential source of labour supply for the airport. Any future increase in road traffic (whether background growth or associated with the airport) will serve to exacerbate the existing problems experienced in this location. The Highways Agency have previously classified this junction improvement as a major scheme for prioritisation by the Department for Transport and we would therefore expect further assessment to determine the improvements that would be required at **Hooley Junction**. These need to be **included in the extended baseline list of schemes with a commitment to deliver these improvements** prior to any second runway becoming operational.
- iii. Reigate road network: Upgrades to the North Downs Line (see above) resulting in more frequent services on this route will increase the down-time at Reigate level crossing. This will considerably aggravate congestion issues on the A217, which is a main strategic route from the M25 to Reigate and Redhill and serving the A25 and A23. We would expect **measures to resolve congestion on this strategic route, and in Reigate, associated with the North Downs Line level crossing to be included in the extended baseline list of schemes and for there to be a commitment to deliver these improvements** prior to any second runway at Gatwick Airport becoming operational.

7.2.5 Road (local): We note that Gatwick Airport Ltd have committed to fully fund local road alterations (including M23 J9 enlargement and the A23 diversion) and provide a £10m local highway development fund to help fund local road improvements. Whilst we welcome this, we do not consider that the proposed local highway development fund will prove sufficient to deal with the impacts of airport expansion traffic on the wider local road network, especially when divided between the large number of affected local authorities. We therefore suggest that **the size of the proposed local highway development fund should be increased**, consistent with the results of a wider and more detailed appraisal of local road network impacts, including the impact of development that could occur as a result of any second runway and the need to ensure wider network resilience. We would support the suggestions of other local authorities that the fund should be at least £30m.

7.3 Housing and social infrastructure

7.3.1 The top end of the Commission's housing forecasts is considerably higher than GAL's own assessment. The Commission recognises new housing will need to be supported by appropriate levels of additional social infrastructure.

7.3.2 The infrastructure requirements associated with new housing development depend on the location and manner in which housing is provided. Housing developers would be required to fund the infrastructure requirements arising directly from their developments, but provision of the strategic infrastructure to support growth will require additional forward funding. **Securing this strategic infrastructure capacity to support new housing growth is vital** if the overall benefits are to balance out, or exceed the negative implications of any new runway. We would therefore expect a commitment from GAL **to increase its proposed infrastructure delivery fund** accordingly (to reflect revised housing growth assumptions) and to commit to provide this money up front, and as a lump sum, to local authorities to allow required infrastructure to be delivered prior to or alongside new development. The Commission's own housing figures suggest that the total fund for this pledge may need to be doubled.

7.4 Environment

7.4.1 Noise: The recent introduction of performance based navigation technologies at Gatwick Airport has highlighted the impact that aircraft noise can have on local communities. We recognise that the flight path information included in the Commission's documentation is only indicative at this stage, however we request that Gatwick Airport give consideration to **extending noise compensation/insulation packages to properties in the wider area affected by overflying**. In addition, we request that **proper consultation** takes place in relation to any future changes to flight paths, or changes that may result in flight concentration effects. In the event of a second runway **respite schemes must be introduced**.

7.4.2 Air quality: Our concerns about the assessment of air quality impact are set out in our response to Question 5 and 6. In the event that Gatwick Airport gets a second runway we would expect a commitment from GAL to fund the following:

- i. **the ongoing annual running costs of the current monitoring programme for a period of 10 years¹.**
- ii. **the capital costs of replacing the equipment at these sites on a regular basis²**
- iii. **an additional monitoring station (and running costs) to the south east of the airport** to be operational prior to building work.

7.4.3 In addition we would expect:

- i. The airport to produce a **full retrospective emissions inventory** and atmospheric dispersion model for the calendar year two years after the opening of the second runway (and if developed separately a second retrospective inventory and atmospheric dispersion model for the second runway and third terminal once the third terminal has been fully operational for a two year period). This will be important to check that the model works correctly in practice in a two runway three terminal scenario in order to have confidence that the original forecasts for air pollution are correct; and to allow time, if appropriate, to design and implement new measures to ensure that the relevant air quality standards are met.
- ii. The airport to undertake - prior to the construction of the second runway - an **assessment of aviation fuel marker concentrations** during odour events on the Horley Gardens Estate. If marker concentrations are sufficiently high for field-based equipment then a one year monitoring campaign at a fixed residential monitoring

¹ At the RG1, RG2 and RG3 monitoring sites, the on-airport LGW3 monitor and the Horley Gardens Diffusion tube network. This should include an additional year of running costs for an overlap period between the existing and relocated RG3 site

² On a 10 year basis for RG1 and RG3, and on a seven year basis on RG2

site to be undertaken to understand the meteorological and operational practices that give rise to the odour issues for local residents.

- iii. **A one year monitoring program** on the Horley Gardens Estate **to examine residential exposure to ultrafine particles**, to assess the relative risk of that exposure and determine whether the airport is a significant source of ultrafine particulates (which have potential impacts on cardiorespiratory and central nervous systems).

7.4.4 We would also expect a commitment from GAL that **in the event of a decline in air quality as a result of any second runway, they review the monitoring data and implement an action plan to reduce pollution back to original levels.**

7.4.5 Flooding: We note that GAL have committed to a £30m flood resilience programme to reduce flood risk to the airport and downstream. We welcome this pledge but feel strongly that **there should be flexibility such that if detailed design work indicates a more extensive avoidance/mitigation regime is required, the flood resilience programme pledge is increased accordingly** to ensure that these vital works are fully funded.

Question 3. Do you have any comments on how the Commission has carried out its appraisal?

and

Question 4. In your view, are there any relevant factors that have not been fully addressed by the Commission to date?

8. Our detailed comments on aspects of the Commission's appraisal are included under Questions 5, 6 and 7.
9. In addition to these, we consider that it is critical that an assessment is undertaken by the Commission of **the implications for Gatwick Airport if the additional runway capacity is provided at Heathrow** (and vice versa). Any decision by Government will need to be taken with a full understanding not only of the implications of each of the new runway options being delivered, but also of the implications of each option not being delivered. For example, what would the economic implications be for the Gatwick area if the additional runway were to be delivered at Heathrow? Would there be a risk of a declining service at Gatwick thus undermining the wider runway capacity available in the South East in the longer term? This information will also be important for the local authorities in the vicinity of each airport who have responsibility for the long term planning of their areas.
10. We also have some concerns about how the funding for avoidance and mitigation measures (including the GAL 'pledges') will be managed, for example how the process of apportionment between authorities will take place, and how it will be phased over the timeframe envisaged between the scheme development stages and any second runway reaching capacity. Further clarification is needed on this issue.

Question 5. 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?

and

Question 6. Do you have any comments on the Commission's sustainability assessments, including methodology and results?

and

Question 7. Do you have any comments on the Commission's business cases, including methodology and results?

11. Our comments in this section of our response relate to the Commission's appraisal of specific topics and sustainability appraisal.

12. Strategic fit

12.1 As noted in our response to Questions 3 and 4, appraisal of the implications for each airport of the additional runway not being delivered at that airport is needed to enable the Government responsible for making a decision about runway capacity to have the full picture of benefits and disbenefits. From a local authority perspective, our particular interest lies in understanding the local economic implications for Gatwick Airport and the Gatwick Diamond area of additional runway capacity being located at Heathrow.

13. Local economy impacts

13.1 As a general comment, we consider that more information about the methodology behind the forecasts within this assessment would allow us to better understand and respond to the Commission's analysis.

13.2 Local economy and employment: The Commission projects that by 2030 the maximum number of jobs generated (above baseline) could be 23,600 (direct, indirect and induced). By 2050, the job growth could be around 32,600. A number of assumptions are made by the Commission, some of which we question.

- i. *The focus in the appraisal on job growth to 2030.* It is clear from the Commission's assessment that job growth will continue beyond 2030 to a peak at 2050. It is important that this longer term growth is properly considered as part of the assessment.
- ii. *That it is reasonable to assume job growth would be equitably split between 15 local authorities.* The Commission's own work identifies that the travel to work area for airport and associated industry staff is fairly small. Whilst in the wider Gatwick Diamond, people travel further distances to work, it is overly simplistic to assume that these commuting patterns could be replicated by lower skilled airport workers whose wages make long distance commuting less realistic.
- iii. *That - in the main - local authorities in the area are not directly dependent on the airport.* Whilst this may be true when considering administrative geographies, it masks spatial variations. For example, the town of Horley in Reigate & Banstead is far more dependent on the presence of the airport (in terms of direct, indirect and induced employment) than the borough as a whole. As noted in our response to Questions 3 and 4, it is for this reason that we are disappointed that further work has not yet been undertaken by the Commission about the local economic impact on Gatwick if additional runway capacity is located at Heathrow.

13.3 Housing: The Commission's projection of housing numbers is based on job forecasts. This results in an extremely wide range of additional households of between zero and 18,400. An approach has been taken which 'allocates' housing equally across 14 local authorities in the Coast to Capital area, and suggests that housing delivery should be phased over the period 2020-30.

13.4 We appreciate that planning for the distribution of new housing does not fall within remit of the Commission (and nor should it) but the crude approach to housing distribution and phasing is not helpful in informing a constructive debate about how the housing implications of a new runway at Gatwick might be accommodated. It has led the

Commission to reach some simplistic and misleading conclusions about the abilities of local authorities to accommodate new housing growth.

- i. *The basis for the calculation of household growth is jobs at 2030.* This is misleading as air traffic and jobs are projected to peak at 2050 at Gatwick. The Commission has neglected to consider the housing requirements generated by the additional jobs growth between 2030 and 2050, which could be considerable, and in addition to the 'up to 18,400' new homes identified in the Commission's report.
- ii. *That the assumption that new housing be provided equitably between 14 local authorities is 'reasonable'.* This approach fails to take into account issues such as the relationship between house prices, commuting costs and airport workers wages. In reality the pressure for housing associated with airport growth will be in those authorities that directly (or closely) border the airport.
- iii. *That 'the demands on any individual authority are likely to be relatively small' and that 'the scale of change associated with development at the airport is unlikely to significantly increase housing pressures on the local authority plans'.* For many authorities, a figure of the suggested additional 130 homes per year represents a substantial uplift on current levels of delivery that may not either be possible or practical to accommodate. For example, in Reigate & Banstead our recently adopted Core Strategy only plans for around 70% of currently identified needs. This allows for increased development densities, a maximising of brownfield development and some development land to be released from the Green Belt. An additional 130 homes per year would represent an increase of around 30% on current planned levels: it is certainly not the case that the scale of additional housing (at the maximum levels) would be 'manageable'.
- iv. *That 'the additional housing is not of the scale which is likely to require transformational policies' and that 'land availability is unlikely to be affected by Green Belt issues'.* As noted above the pressure for housing growth will inevitably be focused on those authorities that closely border the airport. The authorities in East Surrey are heavily constrained by Green Belt, as well as including areas of landscape designation and areas at risk of flooding. Whilst authorities in North West Sussex do not include large areas of Green Belt, they have other development constraints. These constraints are such that the majority of authorities in the vicinity of the airport are unable to fully meet their currently identified housing needs. Any additional housing growth will increase the pressure on the Green Belt, and other areas of constraint, and levels of growth consistent with those suggested by Gatwick Airport Ltd (or greater) will require a step change in planning policies in the area.
- v. *That local authorities could act to increase housing density without elevating densities to levels regarded as 'high'.* As noted above, the local authorities that surround Gatwick Airport are already facing considerable housing pressures and are therefore already seeking to maximise the development of brownfield land and increase housing densities. It is simplistic to assume that densities can be increased much beyond those that exist without compromising the ability of existing settlements to accommodate growth in a sustainable manner. In the vicinity of the airport, the height of buildings is constrained by aerodrome safeguarding.
- vi. *That up to 4,800m² (1/2 hectare) of additional land will be required to meet the additional housing need from the expansion at Gatwick.* Even if there were scope to accommodate a proportion of the new housing required to 2030 on previously developed land, the requirement for greenfield land take would be considerably greater than this³.

³ For example, 1300 homes delivered at 30dph allowing for incidental space would require in the region of 60ha of land

- 13.5 We note that the Commission has estimated the additional social infrastructure that might be required to support new housing growth. The infrastructure requirements associated with new housing development will depend on the location and manner in which housing is provided, and its relationship to existing services and facilities. We are therefore unable to comment on whether they are appropriate or not, however it would be helpful to see a wider and more in depth assessment of social infrastructure requirements by the Commission⁴.
- 13.6 Our own experience is that there is already a substantial deficit in infrastructure funding. The Reigate & Banstead Infrastructure Delivery Plan identifies an infrastructure funding gap of around £80m – that is, to provide the infrastructure required to support the current planned level of growth. Further housing growth would require additional infrastructure and, without fully committed infrastructure funding, serve to increase this gap further.
- 13.7 As noted above, the scale of housing and infrastructure that might be required as a result of a second runway at Gatwick could be a substantial increase on currently planned levels of growth. Any decision to expand Gatwick would therefore be likely to trigger full or partial reviews of a number of local authorities' local plans. The Commission should recognise the process and timeframes associated with plan review and the lead-in times for new supporting development to be delivered.
14. Surface access
- 14.1 Our comments in this section should be read in conjunction with our response to Q2.
- 14.2 Time periods: The Commission's assessment largely focuses on the period to 2030 rather than to 2050. We recognise that there are some uncertainties associated with longer term planning, but it is important that the impacts of a fully operational second runway at Gatwick Airport are properly assessed and understood. Further investigation into the longer term impacts of airport growth on strategic and local transport networks, and how these impacts can be mitigated, is needed. This includes longer term interventions on the Brighton Mainline and on the M25 and around M25 junctions to increase capacity.
- 14.3 North-south transport links: The Hooley Interchange is an important junction on the A23/M23 corridor, yet is not identified by the Commission's consultants in their technical work. There are existing capacity problems in this location, and the junction has previously been classified by the Department for Transport as a major scheme for prioritisation. The Commission identifies the importance of north-south transport routes, which will be used by the majority of passengers to access the airport, and also provide links to key centres of employment (such as Croydon). Yet any future increase in road traffic (whether background growth or associated with the airport) will serve to exacerbate the existing problems experienced in this location. Further assessment is required to understand the impact of increased traffic (both background and airport related) at Hooley and any requirement for junction upgrades in this location.
- 14.4 East-west transport links: The Commission's assessment of surface access largely focuses on the north-south corridor, that is, the Brighton Mainline and A23/M23 corridor. Further consideration needs to be given to east-west access to the airport, which is also an important route to the Airport. In particular:

⁴ By way of an example, Reigate & Banstead Borough Council have recently granted permission for a development of 1570 units at Horley, with a negotiated section 106 agreement to provide required supporting infrastructure to the value of in excess of £40m, including a primary school, community hall, local shops, a medical centre, employment space and new open space and play facilities.

- i. Capacity on the North Downs Rail line, and the wider implications of an increased service on the North Downs line. This should not only consider the need for an increased service on the North Downs Line, but also the issues associated with the Reigate Level Crossing, where the North Downs Line crosses the A217. The A217 is an important local route providing access from the M25 to Reigate and Redhill, the A25 and A23, an increased North Downs Line service (whilst important in rail capacity terms) has the potential to cause considerable disruption to the local road network as a result of increased level crossing 'down-time'.
 - ii. How to overcome identified capacity issues on the M25, and the need for additional improvements to address background growth issues at J8 of the M25.
- 14.5 Network resilience: Further work needs to be undertaken to understand the resilience of the transport network, in particular in the event that the Brighton Mainline or M23 experience disruption. This should include the 'knock-on impact' on the local road network of any such disruption and any associated upgrades to deal with this. In particular, the A217 and A25 are known to be particularly susceptible to congestion when the M23 or M25 are blocked, and are likely to require capacity enhancements.
- 14.6 The local road network: The Commission's documentation identifies that further testing of individual junction capacity on the local road network around Gatwick is needed as these junctions will be the first to experience any issues resulting from increased traffic movements. It is important that this additional assessment is carried out and any associated junction improvements are fully costed. In addition, it is important that the following are assessed:
 - i. The ability of the local network to accommodate traffic arising from housing and business development occurring as a result of any new runway (as well as dedicated airport traffic), and any additional measures required to accommodate this
 - ii. The impact of disruption on the M23/A23/M25. This needs to be modelled to understand the potential impact on the local road network and any improvements needed to minimise the impact of such a disruption and build resilience in the road network, in particular on the A25 and A217.
- 15. Noise
- 15.1 The assessment of noise undertaken by the Commission's consultants focuses on the noise arising from increased aircraft movements. Ground noise from the airport is relevant to residents of Horley. We would therefore urge the Commission to consider how measures to minimise ground noise (for example, screening with buildings and other structures) can be secured by the time any second runway becomes operational. We also support the comments of Crawley Borough Council that additional assessment of the noise implications of road traffic increases should be undertaken.
- 16. Air quality
- 16.1 We have three main concerns with the Commission's air quality assessment work, particularly in relation to Gatwick.
 - i. The single air quality assessment that has been undertaken is not representative and is likely to provide a significant underestimate of the air quality impact of the carbon-traded scenarios. The rationale for a single air quality scenario is unclear. It does not appear to be in line with the Commission's desire to test the proposed runway schemes in relation to several potential future scenarios. We would expect the Commission to undertake further air quality assessment work to consider the

implications of the higher levels of air passenger movements predicted under the carbon-traded scenarios. Without such an assessment the air quality evidence base is not sufficiently robust.

- ii. The lack of dispersion modelling makes it impossible to draw conclusions on the air quality impacts of any new runway at Gatwick Airport as:
 - It is not possible to assess whether or not EU limit values for nitrogen dioxide are likely to be breached by a second runway.
 - It is not possible to assess the improvement / deterioration in pollutant concentrations, both in magnitude, spatial extent and time, experienced by populations living in the vicinity of the airport compared to the 'do nothing' scenario.
 - It means that the Commission has no evidence in relation to which pollution sources are contributing most to areas where there is a pollution problem e.g. aircraft or roads, and thus how likely any mitigation measures proposed by scheme promoters or technology improvements in general are likely to work. This is particularly important at Gatwick Airport where - within the current air quality management area - aircraft are forecast to be the main pollution source in the longer term (by a factor of 3:1) and, of the road traffic pollution, two thirds is projected to be as a result of airport traffic.
- iii. The unit 'cost' per tonne of NO_x used in the calculations of disbenefit may be a significant underestimate. Work currently underway by the Government's Committee on the Medical Effects of Air Pollution (COMEAP) suggests that there may be a significant increase in the health cost of NO_x – this suggests that the environmental costs related to air quality may be greater than currently estimated. We therefore suggest that the Commission seeks guidance from COMEAP on this issue.

17. Biodiversity

- 17.1 There are no direct land take implications that impact on designated biodiversity sites within Reigate & Banstead borough. However the Commission's consultants highlight potential disturbance effects at two designated sites in the borough (the Mole Gap to Reigate Escarpment and Reigate Heath). More detailed work needs to be undertaken to assess the likely significance of these effects and – as appropriate – the provision of appropriate avoidance and mitigation measures by GAL to the satisfaction of Natural England.

18. Water and flood risk

- 18.1 Reigate & Banstead Borough Council are particularly concerned about the potential flood risk associated with new runway development at Gatwick. Parts of the borough lie downstream of Gatwick Airport on the River Mole (and tributaries).
- 18.2 We welcome the recognition that substantial and ongoing mitigation will be needed to mitigate downstream risk of fluvial flooding on the River Mole, but are concerned that there appear to be questions about the extent to which this can be delivered and/or would be satisfactory. Of particular concern is the conclusion that the efficacy of proposed measures would not be known until 'well into the detailed design period and possibly not until the airport was operational': this suggests a considerable and ongoing degree of risk to communities downstream of the airport.
- 18.3 It is therefore of critical importance that further in-depth assessment of flood risk and mitigation measures are undertaken if the scheme progresses to a more detailed design phase and that local planning authorities are consulted upon this work.

Question 8. Do you have any other comments?

19. Provision a second runway at Gatwick will have a range of associated development requirements that will need to be planned properly and comprehensively if the benefits associated with the new runway are to be maximised. There must be a clear mechanism for appropriate strategic planning across the area to deliver these development requirements. This should be a 'bottom up' mechanism, that allows local authorities to work together to deliver the best result for our local communities.
20. Planning to accommodate the level of growth potentially associated with an expanded Gatwick in a sustainable manner is likely to require local authorities in the vicinity of the airport to fully or partially review their Local Plans. It is important that the Commission recognises the timeframes and processes associated with the plan-making system, and – as a result - the 'lead-in' times for delivery of new development.
21. Reigate & Banstead Borough Council has been actively exploring with neighbouring authorities joint working mechanisms to ensure a timely and joined up approach to strategic planning in the event of a second runway at Gatwick. Local authorities are in the unique position of having both in depth knowledge of the local area and the professional expertise to plan for the future of this area and we would ask that - if the Commission is minded to recommend Gatwick as the preferred location for additional runway capacity in the South East - it does so recognising and supporting the value of local government and its unique position to be able to plan for and manage the impacts of airport expansion on local communities.
22. Linked to this point, and to ensure maximum community engagement, we request that (again if the Commission is minded to recommend Gatwick as the preferred location for additional runway capacity in the South East) it makes a clear recommendation that the appropriate decision-making route is through production of a National Planning Statement and Development Control Order.

Annex 2

Additional infrastructure and avoidance/mitigation measures required in support of any new runway at Gatwick Airport.

Reigate & Borough Council believes that, as a minimum, and in addition to the avoidance and mitigation measures and infrastructure upgrades currently proposed in relation to the Gatwick second runway proposal, the following are required.

General

- Clear funding and implementation mechanisms must be developed for all avoidance and mitigation measures required and/or proposed by Gatwick Airport Ltd. Delivery of these measures must be binding on the current or any future airport owner/developer, and measures must be delivered in a timely manner.

Local economy

- In the event that employment growth (including construction employment) is higher than estimated by Gatwick Airport Ltd, the investment by the Airport in training and apprenticeships must be increased proportionally.
- Incentives must be offered by the Airport to attract lower skilled workers from further afield to fill a proportion of the new jobs created.

Surface access

- There must be cast-iron commitment from the relevant parties to fund and deliver extended baseline schemes necessary to deal with background growth and the specific measures associated with airport expansion.
- There must be a commitment from Government to deliver the currently uncommitted and unfunded improvements to the Brighton Mainline to 2030 (the 'extended baseline').
- There must a commitment from Government to fund and deliver the required longer term (post 2030) enhancements on the Brighton Mainline
- There must be further assessment of the upgrades to the North Downs Line that would be required. These must be included in the extended baseline list of schemes and there must be a commitment from Government to deliver these improvements prior to any second runway becoming operational.
- The issue of future M25 capacity must be resolved by the Government prior to any second runway becoming operational
- The extended baseline should include the need to improve Junction 8 of M25, consistent with our own evidence base.
- There must be further assessment of the upgrades to the Hooley Junction that would be required. These must be included in the extended baseline list of schemes and there must be a commitment to deliver these prior to any second runway becoming operational.
- Measures to resolve congestion on the A217 (as an important strategic route), and in Reigate, associated with the North Downs Line level crossing must be included in the extended baseline list of schemes and there must be a commitment to deliver these improvements prior to any second runway becoming operational.
- The size of the proposed local highway development fund should be increased, consistent with the results of a wider and more detailed appraisal of local road network impacts resulting from any new runway. We would support the suggestions of other local authorities that the fund should be at least £30m.

Housing and social infrastructure

- In the event that new housing growth appears likely to exceed Gatwick Airport Ltd's current projections, the Airport must increase the proposed Infrastructure Delivery Fund proportionally.

- The Infrastructure Delivery Fund to be provided up front as a lump sum to local authorities to ensure that infrastructure can be provided in a timely manner.

Environment

- Noise compensation/insulation packages to be extended to properties in the wider area that are/will be affected by overflying.
- In the event of a new runway, appropriate respite schemes to be introduced following consultation with local authorities and communities.
- Commitment from the Airport to a package of air quality assessment and monitoring measures to be agreed with local authorities. In the event of a decline in air quality as a result of any second runway, Gatwick Airport Ltd must review the monitoring data and implement an action plan to reduce pollution back to original levels.
- Flexibility such that if detailed design work indicates a more extensive flood avoidance/mitigation regime is needed, the flood resilience programme pledge is increased accordingly to ensure that the required measures are fully funded

In addition we generally support local infrastructure improvement measures identified by our neighbouring authorities to mitigate the impact of any airport expansion on their own local communities.