CHIEF EXECUTIVE'S DIRECTORATE

[redacted]

Crawley Borough Council

[redacted]

Airports Commission Consultation

Dear Sir/Madam,

RESPONSE OF CRAWLEY BOROUGH COUNCIL TO THE AIRPORTS COMMISSION CONSULTATION ON SHORTLISTED OPTIONS FOR A NEW RUNWAY

I am writing on behalf of Crawley Borough Council with our response to the Airports Commission Consultation on the Shortlisted Options for a New Runway. The response is set out in the attached document which is divided into the consultation questions that were listed in the Commission's consultation documents.

The position of the Council with regards to a second runway at Gatwick was determined at a special meeting of the Full Council on 26th January 2015. The Full Council considered that the interests of Crawley residents, businesses and the environment are best served by the Council **objecting** to a second runway being developed at Gatwick. Further details are set out in the attached response.

The Borough Council has also provided a full and detailed response to the questions regarding the appraisals and assessments that were carried out including the methodology and results. The response contains links to a number of supporting documents which have been referred to. Without prejudice to the Council's position in objecting to a second runway, comments have also been provided about the mitigation of a second runway at Gatwick and additional infrastructure likely to be required should Gatwick ultimately be the option which the government endorses in order to provide additional airport capacity in the south east.

If you wish to discuss any of the issues raised in the response, please do not hesitate to contact me.

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

Crawley Borough Council held a Special Meeting of the Full Council on 26th January 2015 to consider the Council's position with regards to a second runway at Gatwick and its response to the Airports Commission consultation.

The Special Meeting of the Full Council included a full and wide ranging debate by Members who expressed a variety of views on the potential economic benefits, and concerns about the construction of a second runway at Gatwick. These included noise, air quality, traffic congestion, land take and visual impact that it would have on the town of Crawley. The need for funding and delivery of infrastructure improvements to support an expanded airport and the additional housing that would be needed, was also the subject of much discussion.

The following recommendation was approved by the Full Council with a majority of 25 votes for the recommendation with 11 votes against the recommendation.

1. (i) The Full Council considers that the interests of Crawley residents, businesses and the environment are best served by the Council **objecting** to a second runway being developed at Gatwick.

In addition, the following recommendations were supported unanimously.

2. Agree that, without prejudice to the decision in (1) above, the proposed responses on the individual topic areas outlined in section 5 (of the Cabinet report) below be submitted to the Airports Commission, subject to a full, detailed technical response expanding on these issues being agreed by the Chief Executive in consultation with the Leader;

3. Agree that, without prejudice to the decision in (1) above, the proposed additional mitigations and infrastructure requirements set out in section 5 (of the Cabinet Report) below be submitted to the Airports Commission, subject to a full, detailed technical response expanding on these issues being agreed by the Chief Executive in consultation with the Leader;

4. Agree that the Borough Council, without prejudice to the decision in (1) above continues to work closely with Gatwick Airport, the C2C LEP, the Environment Agency and other local authorities on the future of the airport, whatever decision is made on the location of a new runway;

5. Agree that the Borough Council should highlight in its response to the Airports Commission the need for the Commission, and the Government to provide clarity at the earliest appropriate opportunity with regards to the need for future safeguarding of land in Crawley borough for additional runways if a second runway at Gatwick is not the recommended option.

A copy of the Council report, (http://www.crawley.gov.uk/pub_livx/groups/operational/documents/committeereport/pub237653.pdf) and minutes

(http://www.crawley.gov.uk/pub_livx/groups/operational/documents/minutes/pub240298.pdf) of the Special Council are available on the Council's website.

Crawley Borough Council has not examined the documentation with regard to Heathrow in any detail, and does not express a view on either of the Heathrow options.

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

Without prejudice to the conclusion that the Borough Council has drawn in respect of the provision of a second runway at Gatwick, the Council recognises that it is important for it to comment on the additional mitigations and infrastructure requirements which would improve the Gatwick option in the eventuality that Gatwick is the chosen location for an additional runway which the Government takes forward, and to respond to the other questions from the Airports Commission.

Mechanisms for securing pledges and infrastructure

Many of the ways in which GAL has proposed that some of the impacts of a second runway could be mitigated are currently set out in a number of pledges or commitments. Whilst many of these are welcomed and could indeed be enhanced, it is important that the Airport Commission give consideration to the mechanism through which these pledges would be secured and enforced. This could be through incorporating them into a National Policy Statement, and then securing them through the process of obtaining planning permission, such as in a legal agreement. It is important that the Council is involved in the negotiation of the pledges and commitments given the potential impact of a second runway on Crawley, and in the future allocation of the various pledges. It is also important that these pledges and commitments are binding on any future owners of the airport, if the ownership of the airport were to change in the future. The enforcement of any requirements of a planning permission or legal agreement is an issue which needs to be assessed.

Furthermore, appropriate mechanisms need to be set up as part of the decision making process to ensure proposed infrastructure delivery and contributions towards it can be effectively secured and allocated, and the required infrastructure delivered at the appropriate time. Much of this infrastructure will be funded by the airport operator, but other elements, such as social infrastructure to support new housing is likely to require additional Government funding. Some infrastructure, such as new road links, will be required in advance of an expanded airport opening, whilst social infrastructure supporting new housing may be required much later. However, it would be more beneficial for this to be provided in larger, meaningful sums, which can be directed to major infrastructure projects, rather than small amounts over the years as new homes are built which would be more difficult to allocate towards delivery. The councils surrounding the airport should be closely involved in the allocation of this funding and the planning and delivery of new infrastructure.

Surface Access

Both the analysis of road and rail access to Gatwick indicated that traffic related to a second runway only formed a very small part of total traffic predicted to use the transport networks in the next 30 years or so. It was highlighted that the committed improvements and proposed improvements to the networks would help meet the forecast demands of the expanded airport and that of background growth. Many of these schemes are the responsibility of organisations other than GAL such as Network Rail and the Highways Agency. It is vital that transport projects which have been identified in future programmes by the transport providers and authorities but do not yet have fully committed funding do in fact receive that funding so that there is sufficient capacity to meet background growth and that associated with the airport. Not only would the capacity improvements be of benefit to the wider area, but access by rail forms an important part of the strategy of increasing the number of passengers and airport workers accessing the airport by public transport.

It is known that improvements to the concourse at Gatwick Rail Station are already planned irrespective of whether there is to be a second runway. This will also benefit local commuters who use the rail station as a hub. However, the consultation documents highlighted that further assessment is required to consider whether additional improvements are needed to cater for the increased throughput of passengers associated with a second runway. It is important that the station itself has the capacity to cater for the volume of passengers that use it whilst maintaining the appropriate level of passenger comfort and experience and therefore any additional capacity improvements should be identified and implemented if required.

The improvement of bus and coach services for passengers and staff is an important element of the transport strategy for Gatwick, although there was not a significant emphasis on this in the consultation. Initiatives which facilitate and improve routes should continue to be implemented. Currently a Passenger Transport Levy which is based on the number of car parking spaces at the airport is used to help fund improvements to passenger transport such as pump priming new services. Such initiatives should continue.

The analysis also identifies that, on the rail network in the period 2040-50, there could be general capacity issues due to background growth. In addition there are capacity issues with the southern section of the M25 whichever runway option is chosen due to background growth. Again, it is vital that the government and its responsible agencies, Network Rail and the Highways Agency, have long term improvement plans for these areas of the network.

Access to Gatwick both by rail and by road relies mainly on the use of a single strategic route for each mode, i.e. the Brighton Mainline and the M23 respectively. Gatwick's location to the south of London meaning many passengers have to travel around or through the capital illustrates the importance of these routes. As a result if there are operational issues with these routes such as accidents or technical failures, then there is a significant effect on access to the airport. Consideration needs to be given therefore to improving alternative rail routes such as the Arun Valley Line and the North Downs Line, and

alternative strategic road routes, the A24, A22 and A264 for example. Consideration should also be given to the role of and an appropriate route for a western relief road around Crawley.

With regards to local roads and junctions, there is a need for wider assessment of local highway impacts and not just those on the immediate highway network around the airport. This includes roads to the east and west of the airport. Although again a second runway would only be part of the growth of traffic on the local highway network, it is important that there is a contribution to the improvements of these junctions which is commensurate with the impact of the airport. In their submission GAL propose the establishment of a £10 million Local Highway Fund to help fund local highway improvements. It is felt that, given the cost of road and junction improvements, this fund shared amongst local authorities immediately surrounding the airport would fund very limited improvements and therefore needs to be significantly larger to a level of at least £30 million. Furthermore, as there will also need to be investment from other sources in the local highway network to deal with background growth, there also needs to be consideration by the government as to how this is to be funded and delivered.

If Gatwick were to be the location of an additional runway, the detailed design work that needs to be undertaken to further refine the proposals for the local road network should ensure there are appropriate linkages to the existing local network, and provide access from the local network to the airport for employees and passengers from the local area. This includes connections with the revised routes of the A23 and Balcombe Road which also provide for through traffic.

Issues such as the development and implementation of a car parking strategy to manage car parking at the airport and to reduce unauthorised or inappropriate parking in the areas surrounding the airport also needs to be given more detailed consideration by GAL if the proposals at Gatwick are taken forward. Policy GAT3 of the Crawley Local Plan supports the provision of new areas of long term car parking within the airport boundary, as part of the surface access strategy of the airport operator.

<u>Summary</u>

- Importance of guaranteed funding and implementation of planned and proposed rail and road schemes
- Need for strategies and funding to address future background growth
- Examining the potential for improving alternatives to the M23 and Brighton Mainline such as the A24, A22 and A264 roads, and the Arun Valley and North Downs railway lines to improve resilience
- Size of the Local Highway Fund should be increased from £10 million to around £30 million
- Improvements to the local network and junctions including the provision of a western relief road
- Support for public transport initiatives such as through the current Passenger Transport Levy
- Improvements to capacity of Gatwick rail station

Infrastructure to support additional housing and employment growth

The Commission has identified the potential need for a significant number of new dwellings in the area surrounding Gatwick to accommodate new employees, and the potential for significant growth in indirect and catalytic jobs. However, the infrastructure requirements to support this new housing and economic growth have been significantly underestimated by the Commission, given existing infrastructure constraints such as the strategic and local road network, sewage treatment capacity, health and education facilities. For example;

- WSCC as the education authority has advised that additional provision at primary and secondary school level is required to meet Crawley's planned growth to 2030 and options for extending Crawley's schools and utilising places in the planned new secondary school at North Horsham are already being considered. Any further growth would require major expansion or a new secondary school in the Crawley/Horsham area;
- the sewage treatment providers have advised that planned growth up to 2021 can be accommodated within the existing Crawley Sewage Treatment Works facility, but additional housing growth would require expansion of the Treatment Works and land availability may be a problem;
- the health service is considering options for the future of Crawley and Horsham hospitals, neither of which provide A&E services, and that several of Crawley's neighbourhood GP practices have patient numbers in excess of the national average;
- outdoor sports pitches in Crawley cannot be used for much of the winter due to poor drainage, and 3G or suitable drainage needs to be provided to enhance their capacity to support additional residents in the local area.

Housing developers would be required to fund the infrastructure requirements arising directly from their developments, but more strategic provision will require additional and /or forward funding, and the Commission will be encouraged to recommend to the Government that it considers how funding can be committed and delivery mechanisms established to ensure social infrastructure is upgraded in a timely manner to support the necessary housing / business growth, and not just the infrastructure directly required to support the airport. GAL has pledged an infrastructure contribution of approximately £45 million, based on £5,000 per house on its housing figures. As the Commission's maximum projected figure for new dwellings is double that of GAL's, it is suggested this contribution should be doubled to £90 million. Other government funding sources are also likely to be required to provide sufficient infrastructure to support the anticipated level of growth in the area.

A key issue is the mechanism for ensuring GAL's infrastructure commitments, (and many of the other commitments and pledges) are binding on the airport developer, and for securing this and other funding as it will be most useful as a lump sum up front, once the likely housing demand is clarified. Furthermore, the Council would be keen to engage with the Commission, government, GAL and the infrastructure providers to discuss how this funding would be allocated to ensure it results in infrastructure delivery in the local areas most affected by the consequences of airport growth.

Summary

- Increase funding support for infrastructure delivery to support housing and economic growth
- Establish clear mechanisms to secure binding commitments and appropriate funding allocations

Suggested areas of infrastructure required to support the housing are:

- Road improvements, as referred to in the surface access section
- Sustainable access improvements for bus, rail and cycle users
- New Hospital and primary health facilities to serve Crawley /Horsham area,
- Secondary school provision in Crawley / Horsham area (it is anticipated primary school provision is more easily addressed by housing developers)
- 3G or enhanced drainage for sports pitches elsewhere in the borough to help enhance capacity of sports pitches for additional population
- Additional capacity enhancements to the Crawley Sewage Treatment works, or an alternative capacity solution.

Enhancing Economic Benefits

GAL pledges to support 2,500 apprenticeship jobs through grants. It is suggested to the Commission that this figure should be higher, as the maximum number of jobs predicted by the Commission is higher than that predicted by GAL, and also that the apprenticeships should be provided for local residents in the areas most affected by airport growth.

It appears approximately 76,000sq m of B1 office floorspace and 144,000sq m of B2/B8 warehouse/ workshop floorspace, in northern Crawley will be required to relocate as a result of the expansion of the airport. This represents around 17% of the B class floorspace in Crawley. The Commission should recommend that GAL works with the Borough Council and its neighbouring authorities within the Gatwick Diamond to develop a strategy for the relocation of these businesses within the Crawley area, as many of these companies are very important local employers and relocation away from the borough will have a detrimental impact on local residents, reducing any positive economic impact an expanded airport may bring.

Summary

- Increase number of apprenticeships and secure them for local residents
- Develop a relocation strategy keeping existing businesses in the local area

Noise

It is clear that building a new runway 1,045m to the south of the exiting runway will have a significant noise impact on the residents of Crawley. At present most of Crawley, except parts of Tinsley Green and properties to the north along the Balcombe Road are outside the 57dB contour. The 54dB Contour catches more of Tinsley Green and the north-west corner of Langley Green. The Borough is also affected by go-arounds which average about one a day

With a second runway the 54dB contour would move significantly further south taking in most of the neighbourhoods of Langley Green, Ifield and the new development at Forge Wood. However other areas including West Green, Northgate (including the Town Centre), Three Bridges and Pound Hill will be much more aware of the noise from departing aircraft. It is also likely that Gossops Green, Bewbush and especially the new development west of Bewbush will be affected by the proposed 'southern wrap-around' departure route which goes between Horsham and Crawley.

GAL have suggested a Council tax compensation scheme for properties falling within the 57dB contour, it is considered that the Airports Commission should recommend that this be extended to properties within the 54dB contour as these residents will be affected by noticeable levels of noise.

Many of these communities have been previously unaffected by aircraft noise and those closest to the new runway, which will be less than 400m from the end of the runway, will see significant increases in noise. The closest dwellings will experience an increase in both average LAmax and the 16hr LAeq in the order of 12-15dB. In normal circumstances these increases in noise levels from a new development would not be acceptable in planning terms.

Some of the impacts of the noise can be mitigated against with adequate sound insulation which will help protect the internal noise climate, however this doesn't protect the gardens. The closest properties will also require additional mechanical ventilation to prevent thermal discomfort during the hotter summer months. The cost of all these works could well exceed the present £3,000 proposed grant from GAL, particularly for larger houses with multiple windows, and consideration should be given to increasing this limit for the worst affected properties. It is the night time LAmax levels which would dictate the need for additional ventilation and hence increase costs. 60dB is the external level, (ie. the N60 contours), which may affect sleep with windows open for ventilation, and therefore any properties inside the 50 N60 contour should receive additional funding, with those inside the 25 N60 contour also requiring close attention as residents could still be regularly awoken. Properties which are bought out by the airport operator because they are too close to the second runway should be required to be fully insulated before they can be resold.

The eligibility of the present scheme extends to the LAeq 60dB contour. However properties at the 57dB contour would still experience average LAmax levels of around 70dB (especially to the east of the runway) and this would still result in internal noise levels peaking between 55-60dB for each departing aircraft. This is still very disturbing for residents so consideration should be given to extending the Noise Insulation Scheme to the 57dB contour or even the 54dB contour.

There is no mention in the consultation of the insulation scheme being extended to businesses (particularly offices) that will be close to the airport. Many may already be adequately insulated with air-conditioning but some will require additional measures and this should be part of the general Noise Insulation Scheme. There is also a new Free School located on Gatwick Road, in the northern part of Manor Royal, which is aiming to accommodate up to 900

students in the 5 – 16 age range. Appropriate noise insulation needs to be required to ensure the effective operation of this school. Langley Green Hospital, which provides inpatient mental health services, also lies close to the 57 dB contour so appropriate noise insulation needs to be required. It should also be noted that, if the permitted development right for offices to convert to residential use is continued, and light industrial (B1(c)) and storage and distribution (B8) properties are included, there may well be new residents in uninsulated properties close to the airport and, unless noise is added as a consideration which can be taken into account in the prior approval process, there will be no opportunity to seek noise insulation. The Airports Commission should recommend to the Government that this be addressed.

The present Home Owners Support Scheme only extends to the 66dB contour. There are residents of properties in Langley Green who will have their noise environment dramatically changed by a new runway but will live just outside the 66dB contour. Many will not be in a position to move unless they are financially supported to do so. It is therefore suggested to protect those residents that the Home Owners Support Scheme is extended out to the 63dB contour. This will give those who do not want to live in such an environment the opportunity to move.

As part of the mitigation the plans show noise bunds and barriers along the southern edge of the airport, however there is no indication of their proposed height, nor calculations demonstrating the effectiveness of these barriers in counteracting ground noise. These barriers may need to be extended. They will clearly only be effective for aircraft still on the ground.

Some of the most harmful effects of aircraft noise are experienced at night when noise events disturb residents' sleep, including non-awaking arousals, which can have adverse health impacts. To protect the residents in Crawley who will be newly exposed to noise it is recommended that Gatwick's proposal to limit night flights to the Northern Runway be made a planning condition. This is likely to cause some opposition by residents affected by the existing runway but priority should be given to residents who have previously not been affected by noise, and who would have a new noise source forced upon them. The existing residents affected by the northern runway will also initially gain after the creation of a new runway as aircraft movements will be spread between the two runways, so reducing the number of movements on the northern runway until Gatwick reaches its new capacity in approximately 2050.

The Night Quota period should also be extended to include the whole night period (23:00 to 07:00) so removing the noisiest aircraft from the early morning period of 06:00 to 07:00 without increasing the night quota limit as night flights are the most damaging to health. It has often been argued that night flights may have to increase due to the lack of a second runway, therefore conversely limiting night flights between 23.00 and 07.00 should be feasible due to having the extra capacity created by a second runway.

The use of runway alternation should be investigated to minimise the number of people adversely affected by noise.

GAL has recently amended its proposed plans to include the part construction of the new terminal at the same time as the second runway. It is unclear whether the new terminal will service all the aircraft movements on the southern runway or whether a number of aircraft utilising the southern runway will taxi to the existing North or South Terminals. The taxiing distances from both the existing terminals to the southern runway are quite significant and will ultimately increase fuel burn and ground noise.

Summary

- Expansion of the noise compensation scheme to 54dB contour
- Expansion of noise insulation scheme to 57DbA contour
- Expansion of the Homes Owners Support Scheme to 63dB contour
- Importance of minimising impact using runway alternation and use of northern runway for night flights and further restrictions on the night period (23:00 to 07:00).
- Acoustic assessment of noise barriers/bunds and any benefits of extending them along the southern boundary.
- Noise insulation for commercial premises in Manor Royal.
- Concern over noise insulation in commercial properties converted to residential

Air Quality

Although further work is required to fully quantify the risk of exceeding air quality limits in the local area, it can be concluded that overall, expansion will have a negative impact on air quality in Crawley. It is important that the design and operational delivery of the scheme provides maximum mitigation to significantly reduce these impacts. The further assessment work that is required such as source apportionment work (see response to later questions) can help identify and target these mitigating measures.

On-airport mitigation will include operational measures such as reducing the distances that an aircraft has to taxi, and minimising the use of auxiliary power units. Further improvements in aircraft and road vehicle engine technologies will help drive some of this mitigation.

As some of the air quality impact is from surface access sources, there will also be a need to identify and fund a range of improvements to Crawley's local road and public transport networks which support Gatwick's surface access strategy. These local mitigating measures will also need to be funded from a range of sources as the impact is not solely from Gatwick related traffic. This investment will include measures which will allow people to make better informed travel choices helping to reduce traffic emissions.

Examples of mitigating measures that may attract funding will include:

- Measures to improve flow and maximize the efficiency of the highway network (especially to support the AQMA Action Plan proposed for the A2011 corridor)
- Provide real time information on traffic delays and journey times, car parking availability, and bus arrival times.

- Funding to encourage uptake of cleaner vehicles technologies for local businesses and Bus/HGV fleets,
- Investment in more sustainable transport methods such as walking, cycling public and public transport
- Air quality monitoring equipment to assess air quality impacts at local level.

Place and Community

The majority of the land required for a second runway at Gatwick lies within the Borough of Crawley. As a result the documents identify that the construction of a second runway would lead to the loss of a range of facilities and uses which currently occupy the land that would fall within the boundary of a larger airport. It is therefore necessary to mitigate the loss of these uses and facilities or the impact on them due to the airport being much closer than it is at present.

Some facilities such as Crawley Rugby Club will need to be relocated as a result of the proposals. Footpaths and areas of nature conservation will also be lost and new areas created to mitigate against this loss. The new location of all these uses is an important consideration as they need to be located close to the area most affected by the loss of the original facility or features in order to most benefit those affected by the impact.

The expanded airport boundary will be much closer to the existing residential areas of Crawley in Langley Green and Ifield. Therefore, the visual impact of the airport on these areas should be mitigated through appropriate planting or screening. This would include Cherry Lane Playing Fields which would adjoin any new airport boundary. Due to the effect on the nature of this area, enhancing the sports pitches in this area or the provision of a 3G pitch could form an appropriate means of compensation.

The Airports Commission acknowledge that there are twenty listed buildings within the land take area for a second runway which are at risk from whole or partial removal. There are also a number of graves, including war graves, located within the grounds of St Michaels and All Angels Church at Lowfield Heath that need to be respectfully relocated. Although there is reference to the issue of relocating buildings, further assessment of the potential of relocating listed buildings needs to be considered by the Airports Commission. Subject to the findings, there should be a real effort to relocate at least some of the most valued buildings. It could be the case that the focus should be on relocating or retaining the 6 Grade II * listed buildings that are in the safeguarded area. These include St Michael and All Angels Church, Hyders Hall (Gatwick Manor), Rowley Farmhouse, Charlwood Park Farmhouse, Charlwood House, and The Beehive. However, the Grade II listed buildings should also be resurveyed as many were only assessed briefly when initially listed in the 1960's, and they may contain features meriting a higher designation and /or relocation. Ifield Village Conservation Area whilst not in the area required for a second runway is recognised as being close to the new airport boundary and its setting will be affected, particularly by aircraft noise. Appropriate mitigation to help preserve and enhance the setting of the conservation area should be considered by the Airports Commission.

Summary

- Need to ensure that relocation of facilities or new facilities/areas which are being provided to mitigate the impact of a second runway are provided in the area local to those most affected by the loss of the original facilities or features.
- Involvement of the local authority in the relocation of facilities and features.
- Relocation of rugby club
- Further assessment of the impacts on heritage assets, including the potential of relocating some of the listed buildings which could be lost as a result of a second runway.
- Appropriate relocation of graves and war graves in the graveyard of St Michaels and All Angels Church, Lowfield Heath
- Importance of vegetation screening to areas of Langley Green and Ifield, including Ifield Village Conservation Area.
- Enhancing Cherry Lane Playing Fields
- Recreating the continuity of paths and rights of way

Bio diversity

The construction of a second runway at Gatwick will lead to the loss of a number of areas of woodland, ancient woodland and hedgerows. It is important that new planting takes place to mitigate against the loss of these areas takes place as close to the existing areas as possible. It is also vitally important that arrangements are in place to manage and maintain these areas.

In order to mitigate the loss of ancient woodland, a high replanting ratio of 5 trees for each one lost has been suggested by the Airports Commission. It should be remembered that by its very nature, Ancient Woodland cannot physically be replaced so this high replanting ratio is welcomed. However, it should be noted that the submitted Local Plan policy with regards to tree replacement requires up to eight replacement trees depending on the trunk diameter of the trees to be lost.

Summary

- Support for the 5 : 1 ratio for tree replacement for ancient woodland
- Appropriate management and maintenance arrangements need to be in place

Water and flooding

The increase in the number of passengers that the airport caters for will increase the demand in terms of water supply. Although indications are that there would be sufficient resources to meet this increased supply this is in part reliant on water efficiency measures to reduce water consumption per passenger. It is important that such measures are required to be introduced by the airport operator.

Whilst there has been a significant amount of flood risk assessment undertaken to date, it is important that mitigation measures proposed in the more detailed assessment that would be undertaken if Gatwick were the site of an additional runway are implemented at the appropriate time.

The documents refer to discussions with Thames Water regarding the capacity of sewage treatment works to cater for the demand created by an expanded airport. As Crawley Sewage Treatment Works also caters for the rest of Crawley and

part of the wider area it is important that appropriate capacity increases and improvements are undertaken at the appropriate time.

Summary

- Importance of reducing water consumption per passenger to help manage water stress in the surrounding water supply area.
- Ensuring any required flood mitigation for both fluvial and surface water flooding are implemented at the appropriate time including the Ifield element of the Upper Mole Flood Alleviation Scheme.
- Any required upgrade of Crawley STW is undertaken at the appropriate time and takes into account any additional demand from planned and future housing.

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

The Commission used five separate scenarios of the future demand for aviation. The use of these in the assessment of the various impacts of a second runway often gave rise to the potential impacts being expressed in very wide ranges, e.g. economic impact and housing numbers. This made it very difficult to consider the likely impact of an additional runway at Gatwick. It is also unlikely that the way in which the global economy and aviation industry develops will fit neatly within one of the scenarios. The Gatwick assessments also seem to be based on the airport continuing to use the current operating model which may not be the case given that a second runway will double its existing capacity.

Whilst the Council has not considered the documents produced for the two Heathrow options in detail, it is understood that sometimes different assumptions, multipliers or numbers have been used when considering the potential impacts. It is therefore difficult to have any consistency between assessments. The different approaches employed by the Commission between its own work and those of the proposers are also sometimes not explained or justified, e.g. the contributions to the national and local economies of the different runway options.

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

Impact on Gatwick of a new runway at Heathrow: One area the Commission does not appear to have assessed at all is the impact on the economy and prosperity of the Gatwick area if new runway capacity is located at Heathrow. This was previously flagged with the Commission as a key area of concern to the Borough Council, and it was understood some assessment was to be undertaken. The Commission is asked to undertake this work prior to making its recommendation to the government as it is considered there is likely to be a detrimental impact on the prosperity of the Crawley area with potential job losses.

Impact on the local road network: The Commission conclude that the proposed local road network in the GAL submission would provide sufficient link capacity to accommodate forecast flows. However, the report also acknowledges that more

detailed modelling is required to assess impact of forecast flows at junctions. It is considered that this assessment of junctions is vitally important to the operation of the network in the local area. Furthermore, the analysis seems to have been limited to roads immediately in the vicinity of the airport at the eastern end of its boundary and has not considered the impact of traffic around the west of the airport and in the wider local area which will be particularly affected by additional employees accessing the airport. This should include roads such as the A264 which provides access from the east and west into Crawley and Gatwick. It is also noted that some existing roads around the western end of the airport will be closed but the potential impact of this on the local road network is not mentioned. This wider assessment, which should be a recommendation from the Commission, will help identify packages of improvements to the local transport networks which help mitigate the impact of an expanded airport.

The impact of traffic generated by any additional housing also needs to be taken into account in any assessment on local roads. Although GAL acknowledges the potential for a western relief road around Crawley and believes that its proposals allow for its construction there is no acknowledgement by the Commission of this issue nor of how this road, or other necessary road improvements to accommodate traffic growth could be funded and delivered. Similarly, there is limited assessment of the impacts of new roads, for example on land take, biodiversity, and local communities. It is felt that more detailed consideration should be made by the Airports Commission of these issues particularly given that there would be additional housing development in the wider area as a result of a second runway.

There appears to have been no assessment of the impact on local residents of increased road traffic noise, including from commercial vehicles, and of air quality impacts caused by increasing road traffic, for example affecting local schools.

Air Quality: Further with regards to air quality, the Airports Commission admit that they had not undertaken dispersion modelling prior to the publication of the consultation documents. No indication of timescales is given to when the results of this modelling will be available, although there is reference to this work being done at a later date. It is important that this work is undertaken as soon as possible so that the impact of a second runway on air quality in Crawley can be fully understood. This is of particular importance to the council due to the fact that the boundary of the airport moves much closer to residential areas of Crawley than happens at present.

Freight: The Airports Commission suggests a limited growth of freight traffic through Gatwick, based on the comparatively modest level of freight traffic at present. However, the Gatwick area has sector strengths in pharmaceuticals and high-tech machinery, both noted to be heavily air freight dependent, and therefore it is considered the Commission should consider in more detail the potential for air freight growth at Gatwick in its assessments, and the implications this would have on local employment, land take and surface access.

Relocation of heritage assets: There does not seem to have been a detailed assessment of the feasibility of re-locating some of the listed buildings that could be lost as a result of a second runway or whether they could be incorporated into

the design of a new airport. It may be easier or more appropriate to relocate some listed buildings rather than others and it is important that such decisions are given due consideration in light of the appropriate information. There is also no reference to an assessment of the impact on locally listed buildings although there are seven within the safeguarded area.

Carbon Emissions: There is very limited work on carbon emissions. Whilst carbon emissions from aviation may be dealt with separately, some consideration should be given to the implications of increased carbon emissions in relation to increased road traffic and in construction, as well as the loss of bio-diversity and the impact this has on carbon levels.

Equalities Screening: In Section 16 of the Gatwick Business Case and Sustainability Assessment the Commission states that its high level equalities screening has identified that the loss of community facilities may have a disproportionate impact on some social groups but that this can only be confirmed by a more detailed equalities screening. It is important that this full assessment is undertaken by the Commission prior to any recommendation being made, and that the equalities assessment also considers how the impacts of an expanded airport, such as aircraft noise, may have a disproportionate effect on certain social groups, for example children with learning difficulties or vulnerable adults.

Q5 Do you have any comments on how the Commission has carried out its appraisal of specific topics, including methodology and results?
Q6 Do you have any comments on the Commissions Sustainability Assessments, including methodology and results?
Q7 Do you have any comments on the Commission's business cases, including methodology and results?

Local Economy Impacts Assessment

Reasonably accurate predictions of the economic benefits and job creation figures related to expansion at Gatwick are important, both for determining economic prospects but also because of the impact the job creation figures will have on the demand for housing, services and development land to support local business growth. It is impossible to determine what these impacts are likely to be because the ranges for job and housing growth based on the scenarios are so huge, and, whilst the Commission has indicated that the "low cost is king" scenario is the most likely for Gatwick, this does not appear to reflect the likelihood that one or more of the scenarios may occur with the airport's operational mix changing if it expands.

Whilst the economic benefits appear to be spread across a very wide area, south to the coast and north to Croydon and the Wandle Valley, the Commission does recognise that there will be increased demand for commercial premises in the Gatwick area if the airport expands, and that this may lead to increased commercial rents. However, the Commission provides very little assessment of current local employment land supply issues, not appreciating that Crawley currently has an employment land requirement of 77 ha, but can only provide 42ha and there is, therefore, already a deficit. (see Unmet Needs Topic Paper

November 2014 (http://www.crawley.gov.uk/pw/web/pub228702) . This lack of available land may well decrease the economic benefits of an expanded airport to Crawley, as new businesses including new headquarters, may not be able to locate in the local area. The Commission's document "Gatwick: Business Case and Sustainability Assessment", para 1.51, states that airport-related activity makes up 75% of all employment in Crawley's employment areas. This is not, however, the case as, whilst Crawley's Local Plan recognises that the Borough's economy is "buoyed by the presence of Gatwick Airport, 75% of its employment in numbers is in distribution, hotels, transport and communication and banking", not all of which is airport related.

With regard to housing growth, the predicted range is between zero and 18,400. The Commission states that delivery of even the higher level figures, whilst it would need to be carefully managed, does not "present insuperable challenges". This conclusion is reached because the Commission has made the assumption, which it believes "is reasonable, although not actually likely to happen in reality", that the housing will be phased across 14 local authorities within the assessment area, with a maximum of 130 additional houses per year per authority; because the authorities adjoining Gatwick are already building housing; because Crawley, where the focus of demand will be, has already identified its town centre for long term residential development; because brownfield land can be used, and because densities can be increased. The Commission recognises that additional social infrastructure will be needed to support housing growth, but suggests this is just additional forms of entry in local schools, two additional GP's per local authority to 2030 and provision of leisure centres.

The Airports Commission's conclusions on the likely housing numbers and their deliverability are questionable. Crawley's objectively assessed housing need over the next 15 years to 2030 is approximately 8,000, and the borough can only identify a housing land supply for 5,000 new homes. (Further detail is provided in the Unmet Needs Topic Paper, November 2014 (http://www.crawley.gov.uk/pw/web/pub228702). The majority of authorities in the Gatwick Airport assessment area; Crawley, Brighton, the coastal authorities, and the authorities to the north with large areas of green belt are unable to meet their existing objectively assessed housing needs now, (with an anticipated shortfall across the assessment area of at least 30,000 homes over the next 15 years). Any development sites identified in Local Plans are planned to meet existing needs and are not available to address any future additional demand related to airport growth.

In relation to Crawley specifically, the Commission does state that "there are not obvious areas of opportunity to find a substantial amount of land for development in the longer term, as land around the airport is constrained by existing or planned development (notably Forge Wood) and Sites of Nature Conservation Importance." It notes that a large area to the north of the borough is allocated as "Gatwick Safeguarding" in the Local Plan. However, it then suggests that "this large area could be a suitable area for further growth in the longer term", and that "as there are no key constraints such as Green Belt within the borough, it is reasonable to assume that the borough as a whole could accommodate substantial growth in the longer term". The Commission also appears to imply

that Kilnwood Vale “a large area west of Crawley allocated for mixed use development” could also form future land supply.

These conclusions on land supply are flawed. If a second runway is built then the majority of the land in the north of the Borough safeguarded in the Local Plan for a second runway will not be available for employment or housing development because it will be used for the runway, apron and terminal facilities. There is a limited area in the north east of the expanded airport boundary which may be available for commercial uses.

Kilnwood Vale is an existing planned development, already under construction and meeting existing needs. Identification of Crawley’s town centre as a possible location is flawed because, again, this planned development is to meet existing need, without a second runway. The suggestion that higher density and /or brownfield development will address the problem is also unrealistic. Authorities are already considering all options to increase housing delivery, including the use of brownfield sites. In Crawley, higher density schemes are already being planned within the Borough in appropriate locations such as the town centre, but these have to be appropriate to their context, and locations within Crawley’s neighbourhoods, for example, may not be suitable for high density development. Also, because of aerodrome safeguarding for Gatwick, the CAA imposes height limits on development in Crawley which further limits densities.

Crawley can only meet 60% of its existing housing and employment needs because of its tightly constrained boundary, physical constraints such as flooding, airport noise to the north and the AONB to the south. The authorities to the north of the airport all have extensive Green Belt designations, the High Weald AONB and the South Downs National Park extend across much of the districts to the south, and much of the narrow coastal strip is constrained by flooding.

The Commission recognises it is unrealistic to assume growth will be evenly spread across the 14 authorities in the assessment area, but state it is a reasonable assumption and then base their conclusions of impact on this assumption. The percentage of current airport staff is as low as 1% in some districts like Eastbourne, Worthing and Adur and long distance commuting is unlikely for many relatively low paid airport jobs. The focus of housing demand will fall to Crawley, where approximately 30% of current airport staff live but, as explained above, Crawley already has an unmet housing need so the delivery of new housing is likely to have to be within the local authority areas neighbouring Crawley. As is recognised by the Commission, the scale of housing and economic growth likely to be associated with an expanded airport has not been considered in the planning strategies of any authorities in the Gatwick area.

The Commission believes that the high level forecasts of housing growth will not be reached because local unemployment of 9.3% (2013) means many jobs will be taken by Crawley residents where there is a good skills match, and because there is significant out commuting in the area which will be replaced by residents taking more local jobs at the airport. However, the Commission has overestimated the capacity of existing residents to take up jobs at the airport, as Crawley’s unemployment rate is 5.3%, 3,200 people (Nomis based on the July

2013 – June 2014 ONS Annual Population Survey https://www.nomisweb.co.uk/reports/lmp/la/1946157342/report.aspx), meaning fewer new jobs at Gatwick will be taken by existing unemployed residents and increasing the demand for additional housing. Crawley itself is already an area of net in-commuting, with over 24,000 commuters travelling into the borough so there is limited capacity for new airport jobs to be taken up by existing residents currently out-commuting.

The Commission recognises that there is a significant problem with housing affordability in some areas around Gatwick, such as Epsom and Ewell, Horsham, Mole Valley and Tandridge, but considers that Crawley, Croydon and Reigate and Banstead remain relatively affordable. However, the figures are based on average earnings and therefore do not take account of the relatively lower paid jobs at the airport, nor the extent of in commuting into the Borough. The most up to date data on affordability, from the CLG in June 2014, shows that median house prices in Crawley are 6% above the national average, and the ratio of lower quartile prices to lower quartile earnings is now 7.28:1, again, above the national average. The Northern West Sussex Housing Market Affordable Housing Needs Model Update, October 2014, (http://www.crawley.gov.uk/pw/web/PUB231420) states that the trend in the area (Crawley, Horsham and Mid Sussex) is one of rising unaffordability, with levels significantly above the ratio for England. The delivery of affordable housing as a significant proportion of any new housing to support an expanded airport will be critical and this should be part of the Commission's recommendations to the Government.

Further work is needed to better clarify the likely housing numbers and the phasing of growth. The Commission states that all the housing demand generated by growth at Gatwick is required by 2030, and yet the air traffic and therefore the job growth increase gradually until 2050, so the housing needs should be spread until 2050. This is in contrast to Heathrow where the maximum job growth is at 2030, but the Commission have not made this distinction. This clarity is necessary so that, if Gatwick is recommended, then the local authorities have a reasonable starting point to begin to work together on an appropriate housing distribution based on constraints, existing population centres, transport links, and services.

Summary

- Need to assess the local impacts and benefits more accurately and understand how the challenges can be dealt with realistically at a local level
- Concern over the wide range of figures for employment and therefore housing growth
- Uncertainty over which scenario is the most likely, and assumption Gatwick's air traffic model will continue as now
- Inconsistency in methodology with Heathrow.
- Correct discrepancy in skill level data
- Inaccuracy of unemployment rate
- Insufficient recognition of infrastructure requirements to support housing growth

- Questionable conclusions over increasing density and use of brownfield land
- Questionable conclusions on housing affordability
- Incorrect assumption that all housing growth will be required by 2030, when air traffic growth and therefore jobs peak at 2050
- Lack of recognition of land supply and availability constraints, and existing unmet needs in the area
- Unrealistic assumption that housing growth will be spread equally over 14 authorities

Surface Access

Local Roads

GAL list a number of schemes in the vicinity of the airport which are required to facilitate access to the airport and its new terminals. These schemes include:-

- Junction 9 flyover for south bound slip
- Airport way widening
- A23 re-alignment
- Re-provision of Balcombe Road
- New terminal accesses
- Improvements to Longbridge roundabout

The importance of continuing to serve local traffic and through traffic is also highlighted. However, GAL does not consider the impact on the local roads to the west of the airport, and other routes such as the A264 to the east. It is absolutely essential that there is more detailed assessment of the impact of airport related traffic on local roads and in particular junctions with subsequently any necessary mitigation measures being taken into account.

The impact on carbon emissions from road traffic is not clear. As a result there should be more assessment and clear information provided on this to consider the impact of an enlarged airport as a whole.

There is limited assessment of issues surrounding airport related parking. GAL indicate that additional airport parking related to a second runway could be provided within the airport boundary which is supported by emerging local plan policies. It is also important that the potential for passengers parking on roads in the surrounding area is also considered to enable this to be managed.

Summary

- Need to assess the impact on junctions and the wider local highway network including around the western side of the airport such as the links between Crawley and Charlwood
- Need for further assessment of carbon emissions from road traffic
- Impact of increased traffic on on-street parking

Noise

The Council supports the methodology used to predict the potential noise impact from Gatwick with a second runway. The Airport Commission has accepted that it is difficult to predict, with any degree of accuracy, the future fleet mix and growth in aviation in the South East. Providing low and high growth forecasts allows a more realistic picture of what the potential changes of the noise climate in the area could be.

The use of multiple metrics to assess the impact of noise is also supported, as only using the LAeq is a very poor indicator of impact and annoyance. It is disappointing that the use of the Noise Number Index (NNI) was not even discussed as an option for assessing noise impact. It is the only metric which combines both the level of noise from individual events and the number of events.

The use of the N70 and N60 contours are welcomed but to accurately reflect the impact of night noise events as outlined in the WHO report 'NIGHT NOISE GUIDELINES FOR EUROPE', the N60 should be reduced to the N52 to reflect awakenings or even the N45 to reflect the known biological effects of night noise events.

The Commission has not undertaken any assessment of the impact of road traffic noise, particularly along new routes such as the re-routed A23, but also of increased traffic on existing roads.

Air Quality

In conducting its assessment, the Commission has used a range of methodologies and assumptions for analysing and forecasting future scenarios that were not the same as those used by the GAL. The risk is that the assessment is not comparing on a like for like basis. The Commission and GAL used different models to predict passenger numbers resulting in different transport predictions which in turn effected the aircraft and road network emissions used to forecast air quality impacts. These inconsistent modelling methodologies made it difficult for the local authority to draw conclusions about the results of the air quality impacts of the proposed expansion.

The Commission's emissions modelling took into account the whole of the road transport network for journeys associated with the airport whereas the GAL assessment looked only at local road emissions. As a result the emissions levels used by the Commission were considerably higher than those use by GAL. Although the Commission's assessment was more representative and accurate it nevertheless made comparison difficult because different parameters were being used.

The aim of the Commission's assessment was to look at each option using the appraisal framework against each of the five future scenarios. However, this has not been done in the case of the air quality objective. The Commission has only modelled against one future scenario: Carbon Capped Assessment of Need (essentially 69 mppa and 476,000 movements by 2050), even though the Commission's forecast of economic benefits were based on a carbon traded scenario, and under this scenario there are expected to be 95mppa and over

540,000 air passenger movements at Gatwick by 2050. In effect there has been no assessment of the worst case scenario for air quality (although this was done for noise impacts).

The mass emissions modelling carried out by the Commission has been used to assess the risks of exceeding EU air quality limits. However, mass emissions modelling does not provide sufficient detail to show local hot spots, this can only effectively be done by dispersion modelling of the pollutants, which has not yet been carried out by the Airports Commission.

Dispersion modelling carried out by GAL has indicated that air quality levels would not breach national and EU limits, albeit there will be deterioration of air quality in the area, with some locations showing up to 60% increase in NO_2 compared to current levels. An independent assessment of GALs modelling in this area is needed to assess confidence in their findings. The lack of independent dispersion modelling has been acknowledged by the Airports Commission who intend to supply detailed dispersion modelling at a future date which will identify the local health impacts of the airport expansion and scrutinise GALs work. However, until this modelling is available, it is not possible to accurately assess the air quality implications of the proposal or the scope of the mitigation.

The Commission has not provided source apportionment work to support claims that the major pollution source is road traffic. We would welcome an independent assessment by the Commission of this parameter at Gatwick to determine the emission contribution provided by the airport which will help guide mitigation measures so that they can be targeted most effectively.

Summary

- Importance of undertaking dispersion modelling to fully assess the impact on areas close to the airport.
- Further examination of the uses located close to air quality hot spots such as schools which could be affected by worsening air quality.
- Undertaking or source apportionment work to assess in more detail the impact on air quality of increased road traffic as a result of the runway

Place and Community

The Commission calculates that 67 hectares of employment land would be lost. GAL have stated that they would work with businesses to relocate them to alternative premises. No significant details of the number of businesses or the amount of floorspace that would be lost is provided by the Airports Commission. There is also no analysis of the feasibility of GAL's proposals to relocate businesses to an area within the eastern end of the airport boundary as suggested in their submission, but these employers provide jobs for many local residents so it is important they remain in the local area. The relocation of businesses also needs to be considered by the Commission alongside the additional demand for employment floorspace which may arise following the construction of a second runway. The Council will continue to work with GAL and the business community to help business relocate if necessary.

Para 2.64 refers to there being 60ha of land within the designated green belt. This figure would not seem correct as the majority of the land required for the expanded airport is in Crawley which does not have any Green belt.

A number of other uses would also be affected including Crawley Rugby Club, Outreach Three Way, several pre-schools and places of worship. It is agreed that alternative premises and/or sites will be required for these premises although no further details or assessment of availability of alternative sites are currently given. However, it is important that these facilities are provided in the local area so that those most affected by the loss can benefit from the new facilities. Although the direct impact on Cherry Lane Playing Fields is limited, it will be adjacent to the airport boundary should a second runway be built. Other than reference to the visual impact (see below) there is very little reference to the impact on this area. The possibility of enhancing the facilities here by means of compensation for significant changes to its setting should be considered by the Commission. The Council would be keen to work with GAL and these groups to help them relocate.

The visual impact on northern fringes of Langley Green and Ifield, including Cherry Lane Playing Fields is highlighted by the Airports Commission, although with vegetation screening the report considers this impact to be negligible. The network of paths across what is currently the safeguarded area would be affected by the construction of a second runway. In particular the current “Greenway” circular route around the town appears severed north east of Manor Royal where A23 runs alongside airport boundary. It is important that the public right of way network around northern /eastern edge of Crawley is recreated. Although there is some reference to re-provision of paths, it is felt that more attention needs to be given to the continuity of paths and the links they provide to other areas.

Summary

- Further assessment required of how businesses whose premises will be lost as a result of second runway would be relocated locally.
- Further assessment of the availability of alternative sites for uses such as Crawley Rugby Club that need to be relocated
- Further assessment of the potential of relocating some of the listed buildings which could be lost as a result of a second runway.

Bio-Diversity

The Airports Commission identify that a significant proportion of Willoughby Fields Local Nature Reserve and Rowley Wood Site of Nature Conservation Importance would be lost. The total amount of woodland lost is 75.5 hectares which includes 14.2 hectares of ancient woodland along with 50km of hedgerows. The Airports Commission differ from GAL in their conclusion on the amount of new habitat areas which should be created by means of compensating for the loss of the above areas. The Commission’s figure is 283.7 hectares of new habitat compared to GAL’s 142 hectares. This is in part due to the Airports Commission proposing that Ancient Woodland should be replanted on the basis of five new trees for every tree lost compared to GAL’s proposed 3:1 ratio. Although there is some reference to the issue of where these new areas would be re-established, there is no detailed assessment of the feasibility of this level of

habitat creation and its future management. Furthermore, it is important that those most affected by the loss of access to the existing areas of habitat are able to access and therefore benefit from the new areas.

Summary

- Feasibility, location and management of new habitat areas as locally as possible.
- Need for assessment of loss of carbon sink due to woodland loss

Water and Flood Risk

The construction of a second runway would lead to substantial modifications to the River Mole and Crawters Brook. This could lead to some benefits to bio-diversity from the re-naturalisation of the currently culverted section of the River Mole but the effect on water quality needs to be assessed further if designs progress.

It is recognised that the baseline likelihood of surface water flooding at Gatwick is substantive and that, with the proposed changes to the rivers, the potential impact of fluvial flooding downstream needs to be carefully considered. However, the Airports Commission acknowledges that GAL has reflected this in their submission. GAL highlight in their submission that they are undertaking further hydraulic modelling work to progress the Ifield reservoir element of the Upper Mole Floor Alleviation Scheme although their flood risk modelling for the second runway does not assume that this scheme would be in place. Therefore if it is constructed, there would be a further beneficial reduction in flood risk both in the Ifield area and at Gatwick. GAL have stated that they accepted the recommendation of the McMillan report carried out following the December 2013 flooding at the airport that consideration should be given to bringing the scheme forward with a contribution from Gatwick. Resolution of the surface water and fluvial flooding issues at Gatwick and downstream should be a key requirement from the Commission.

With regards to wastewater, there has been limited assessment of the issue by the Airports Commission. GAL state in their submission that Thames Water have confirmed capacity upgrades at Crawley sewage treatment works would be required to serve a new terminal and that these could be provided subject to funding. It is important that any future assessment of capacity at the sewage treatment works takes into account existing planned development in Crawley as well as any future demand arising from additional housing in the area that takes place as a result of a second runway, and that appropriate funding is put in place.

Summary

- Importance of completing the assessment of the Ifield reservoir
- Requiring further assessment of flood risk and mitigation measures to be undertaken if the scheme progresses to a more detailed design phase.
- Ensuring that the assessment and delivery of capacity at Crawley sewage treatment works takes into account the demand arising from planned and future housing requirements.

Waste
It is noted that GAL also propose an energy from waste plant and an anaerobic digestion facility but there is little detail provided. The Airports Commission note that the consents required for these type of facilities are quite complex and time consuming. The Council would wish to be involved in this process.

Q8 Do you have any other comments?

Expedient Decision Making
It is appreciated that the Commission's remit is to recommend the most appropriate option for airport expansion to the Government. However, given the impact the uncertainty over the future of Gatwick Airport has on the planning of the Crawley area, the Commission is asked to encourage the Government to make a clear decision on airport expansion as soon as possible after the Commission's work is completed.

Certainty over future need for safeguarding:
Should the Commission determine that Heathrow is the most appropriate location for airport expansion, it is very important for the future planning of Crawley that certainty is provided as to whether the requirement for land to be safeguarded in the north of the Borough for a potential second runway at Gatwick is to be removed, in which case this land could be considered for development. It is the only significant remaining area of land within Crawley that could be available to help address Crawley's unmet development needs, particularly for employment. This should form part of the Commission's recommendation to the Government.

Topic Paper *1 "Future of Gatwick Airport and the Implications for the Local Plan" November 2014* (http://www.crawley.gov.uk/pw/web/pub228698) explains the impact uncertainty over the future of Gatwick Airport, and safeguarding, has on the planning of the borough.