



[REDACTED]

Date: 02 February 2015

Dear Sir,

Horsham District Council Response to Airports Commission Consultation

Thank you for the opportunity to comment on the Airport's Commission assessment of additional runway options at London Gatwick and London Heathrow Airports. Horsham District Council (HDC) consider this to be a vitally important consultation that could result in large-scale changes with the potential to shape the future development of the Horsham District and surrounding areas for years to come. Naturally, given the proximity of HDC to Gatwick Airport, the attached response focuses mainly on the Gatwick option as this is where our local knowledge applies and where we feel our comments can be most helpful to the Commission in making their final recommendation to Government.

As you will be aware, HDC is located directly to the south west of Gatwick Airport, with a portion of the District's north east boundary abutting the airport's boundary. Key transport corridors pass through the District including the London to Brighton mainline, and the A24 connecting Worthing and the South Coast to the M25. What happens at Gatwick Airport has always therefore been highly relevant to the future of and development within the Horsham District; and the response set out in this letter is made with this in mind.

Whilst we understand the final decision on the location of additional runway capacity in the South East will be made at a national level - with national political and economic considerations driving the decision - Horsham District Council consider it vitally important to set out to the Commission (and to Government) the local perspective on these options and how they might be improved.

As you will read in the attached response, HDC has elected not to support a new second runway at Gatwick Airport as it is considered that there are a large range of outstanding issues (including the scale of the likely impact on the environment and character of the area) that need to be explored further. It is considered by HDC that whatever the final decision is regarding additional runway capacity in the South East; we will continue to work to ensure that the maximum benefits are secured for our residents and businesses, and at the same time, ensure that negative impacts are minimised.

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,

[REDACTED]

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Airport Commission's Consultation on Additional Runway Options in the South East of England

Horsham District Council - Detailed Comments

Q1: What conclusions, if any, do you draw in respect of the three short-listed options?

Answer:

- 1.1 *The Council supports policies that provide both economic growth and jobs in the district; however, a second runway at Gatwick is forecast to provide an unprecedented impetus to the economic development of the surrounding area and the Council believes that the negative effects have not been sufficiently addressed.*
- 1.2 *After full consideration of the Gatwick option, the Council has concluded that because of the very considerable detrimental effect that a second runway is likely to have on the physical, social and economic environment and on the character of the district, it strongly opposes the Gatwick option.*
- 1.3 *More details setting out the background to this conclusion are contained in the answers to the Commission's specific questions and the report to Council on the 21st January 2015 (attached)*

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

Answer:

Local and Regional Economy

- 2.1 *The Commission notes that the employment structure for an expanded airport, with its focus on lower skilled jobs fits with the current skills structure of the workforce within Crawley. Given that a significant proportion of any increased workforce will be drawn from beyond Crawley's boundaries, this creates an issue for neighbouring authorities, such as Horsham District, which have a workforce with a different skills structure. The proposal by GAL to commit to 2,500 new apprenticeships is welcome, but, in the light of the Commission's forecasts, should be extended so that lower skilled workers wherever they are drawn from are able to develop the skills to compete in a wider employment market and are not tied to the lower skilled opportunities at Gatwick*
- 2.2 *The Commission is therefore asked:
To seek to mitigate the impact of any growth in unskilled employment through an increase in the number of apprenticeships in Gatwick's proposed community pledges.*

Social Infrastructure

- 2.3 *In terms of the community infrastructure needed to support housing growth, it is reasonable to expect a contribution from house builders, particularly towards the provision of local facilities and GAL has itself pledged a further £46.5 million.*

However, given that the Commission's estimate of the number of houses needed is currently twice GAL's, the amount provided as a result of expansion at Gatwick airport should be increased. Moreover, the Commission should recognise that this will not be sufficient to address strategic needs in the area, particularly those relating to increased or new secondary school facilities in the areas most affected by increased housing pressure, the impacts on local Clinical Commissioning Groups (CCG) as a result of the inevitable effects on health which a second runway would have within the area, and access to hospitals. Access to hospitals is already a concern in the northern part of West Sussex and the problems will be exacerbated by further population growth linked whether directly or indirectly to the growth of the airport. The need for a commitment from the Government to a new hospital to serve the area and for a direct link to East Surrey Hospital from the M23 should be incorporated into any recommendation from the Commission for a new runway at Gatwick.

2.4 The Commission is therefore asked:

To review the level of commitment that would be needed to new social infrastructure with a new runway, to include:

- Recognition of the additional costs and land needed for providing secondary education, local health and other services which serve the growing population at a strategic level.
- The need for a formal commitment from the Government to the provision of a new hospital to serve the north West Sussex area and a new link to East Surrey Hospital from the M23.
- An increased contribution from GAL or a future airport operator to reflect the higher housing numbers indicated by the Commission.

Surface Access

2.5 The Commission's assessment is based on an assumption that schemes to meet background growth in demand for travel will be delivered. It would be essential, therefore that there is a firm commitment from the Government to these schemes and a timetable for their implementation. Moreover, it is of concern that, even though the primary driver for improvement is background growth, part of the capacity to be provided will be used up by expansion of the airport and the associated business and residential development. This will inevitably bring forward the point at which further improvements will be needed to the network in order to avoid unacceptable levels of congestion. The Commission has already noted that the Brighton Main Line may need further upgrades in the 2040's and it seems likely that improvements will become increasingly difficult, and possibly expensive to deliver.

2.6 Significant reliance is placed on the North-South corridor which contains the M23/A23 and the Brighton Main Line; the Commission should give more consideration to the impacts on other major links in the area, including the Arun valley line railway line, as well as A roads in Horsham (particularly the A264 and the A24), both of which are likely to experience further pressures, both in their own right and as alternatives to the M23/A23. A western relief road for Crawley should also be included, to facilitate access to the airport and to reduce the amount of traffic seeking to use other less suitable routes to the airport.

2.7 Whilst GAL has indicated that it would provide £10 million to a local transport fund, little consideration has yet been given to the impact on local roads. Roads to the

west of the airport already experience 'rat-running' particularly at peak times. This is likely to be exacerbated with the increased demand for access to the airport. Further discussions are needed to establish an appropriate size for the fund and who should contribute to it. However, it should include specific provision for addressing problems on local roads as well as at strategic junctions.

2.8 The Council ask the Commission, should the Gatwick option be chosen:

- To seek to ensure that there is a formal commitment at a national level to the strategic road and rail network enhancements set out in its 'baseline'
- To note the Council's concern that much needed capacity improvements to the strategic road and rail network would be, in part, used up by the demands from a second runway and to incorporate into the assessment further improvements which would be needed, partly as a result of a new runway at Gatwick and associated development.
- To incorporate into its assessment the need for commitments to east-west improvements to the strategic road and rail network, including the Arun Valley line, the A24, A264 and a new western relief road at Crawley.
- To include within its assessment the impact of a new runway and associated development pressures on local roads and the need for an enhanced package to address those impacts.

Noise

2.9 Whilst in terms of noise the greatest impact is on the northern part of Crawley, the effects of noise on parts of Horsham District are also a major concern. Maps produced by the Commission show how, without a second runway, noise contours contract as with time and consequent technological advances aircraft generally become quieter. With a second runway, those contours expand significantly. Whilst currently, the contours have a predominantly east-west orientation, with a second runway, contours would extend south, reflecting, in particular, take-off routes. The village of Rusper currently lies outside the 57 dBLA_{eq} 16 hour contour, the level used by the Government as marking the approximate onset of significant community annoyance from aircraft noise. With a second runway, the Commission's forecasts show the village falling between the 57 and 60 dBLA_{eq} contours.

2.10 The concern extends beyond the formal contours. The recent flightpath trials carried out at Gatwick have demonstrated the impacts of increased overflying on areas and communities which currently enjoy comparatively high levels of tranquillity. In this respect, the average contours used by the Government and the Commission fail to pick up the issue fully. The issue is particularly significant for communities such as Warnham which are comparatively close to the airport, but is also likely to be an issue further away when regular and frequent overflight disrupts the normal tranquillity of a largely rural area.

2.11 Noise from night flights is recognised by the Commission as an issue. GAL suggested that the northern runway could be used for nightflights. Whilst at this stage it is not possible to determine the operational characteristics of an expanded airport, the Commission needs to look at this issue in more detail with a view to establishing clear conclusions which can be translated into operational requirements.

2.12 Some mitigation of noise effects can be achieved through noise insulation, although this does not address the outdoor environment. GAL propose to extend their noise

insulation scheme to cover the costs of insulation up to £3000 for houses within the 60dB contour. Consideration should be given to extending the scheme to properties falling within the 54dB contour to reflect the impact on properties which are currently experiencing very little disturbance from noise. Similarly GAL's proposed council tax initiative whereby existing residents within the new 57dB contour for a second runway would receive an annual payment of £1,000 towards their council tax, could be extended to houses within the 54dB contour with the level of contribution stepped to reflect the differing levels of disturbance.

2.13 The Council asks the Commission::

- *To note the Council's concern at the level of noise and disturbance which would be generated by a second runway.*
- *To review its noise scorecards to take into account the effects of noise on typical days in the summer and winter.*
- *To take greater account of the impacts of noise on areas and communities which currently experience comparatively tranquil environments and which would be likely to be newly affected by overflying aircraft.*
- *To incorporate noise mitigation measures and mechanisms for ensuring their delivery, including;*
 - *an effective regime for limiting and managing night flights, and*
 - *an increase in the pledges from GAL to include noise insulation and Council tax rebates for properties lying within the 54dB LA_{eq} 16 hour contours.*

Costs and Operational Viability

2.14 *The Council notes that the costs of the Gatwick Option are significantly less than those for the Heathrow options and the level of financing is not considered unprecedented. However, finance could prove challenging given the uncertainty over passenger demand and the raised passenger charges in a competitive environment. This is an issue which is likely to be debated further but not one on which it is proposed the Council comment at this stage. However, the Commission should note that it is essential that, in developing delivery mechanisms, robust processes are put in place to ensure that infrastructure and other commitment needed to address or mitigate the impacts of a new runway and associated development.*

2.15 The Council asks the Commission:

- *To establish robust mechanisms which ensure that infrastructure and other commitments needed to address or mitigate the impact of any new runway and the associated development would be delivered.*

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

Answer:

3.1 *The Council notes that the consultation is set against the background of the Commission's initial conclusions that there will be a need for additional runway capacity in the South East of England by 2030. Those conclusions do not form part of the current consultation which is focussed on the three shortlisted options put forward by the promoters at Gatwick or Heathrow and the Council does not comment on these wider issues.*

- 3.2 *The nature of the assessment does not make it easy to identify, in detail, the implications which a new runway at Gatwick would have on the local area. The range of scenarios used results in markedly different outcomes and the Council recognises that the Commission does not indicate whether it considers one of the scenarios to be more likely than the others and advises against assuming a mid-case option. The Council's response recognises the uncertainty, but is set within the context of what could happen if the Airport were to grow at the fastest rate identified by the Commission.*

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

Answer:

- 4.1 *The Commission is considered to have produced a wide-ranging and detailed appraisal of the options. All the main issues have been covered although there are a number of areas where the assessment needs to be extended or altered to provide a more robust basis for a comparison between the options and to ensure that there is a full understanding of the potential implications for the local area. These are detailed in other sections of this response.*

Q5: Do you have any comments on how the Commission has carried out its appraisal of specific topics (as defined by the Commission's 16 appraisal modules), including methodology and results?

Answer:

Strategic Fit

- 5.1 *The Council notes that, whilst the assessment includes a commentary on the competition between airports in the South East, it does not analyse in any detail the impact of growth at one airport on the future of the others as a result of an additional runway. This is an issue which has been raised by local authorities in the Gatwick area before and is a factor which the Commission should take into account when it makes its final recommendations.*
- 5.2 *The Commission's cautious approach towards the potential growth of freight traffic through Gatwick, reflects the comparatively modest level of freight passing through it at present and the requirement for significant third party investment if further growth is to take place. By contrast, Heathrow with its strong existing role in the cargo sector is seen as well placed to grow. If Gatwick was to grow its freight traffic, the increased scale of cargo operations would have consequences for local employment, land and infrastructure and this is not addressed by the assessment.*
- 5.3 *The Commission's conclusions regarding, local and regional development strategies, need to be tempered. There is a lack of a cohesive regional plan for the wider Gatwick area, and, whilst local strategies seek to boost the economy of their areas, they do not, provide for the scale of growth and change which would be associated with a new runway.*

5.4 The Council asks the Commission:

- To extend its analysis of the 'strategic fit' of the three options to include an assessment of the impact of a new runway at Heathrow on Gatwick and the other airports in the South East.
- To review its assessment of the scale of freight which might pass through Gatwick with a second runway, and the consequential implications for local employment and transport, taking into account the potential changes in the character of the airport over a long period.
- To note that the scale and nature of growth associated with a new runway at Gatwick has not been factored into current economic and planning strategies and that a wider Gatwick sub regional plan taking into account all scenarios is needed if there is a second runway at Gatwick, given the significant adaptation that would be required locally.

Local Economy

5.5 As with the assessment of the 'strategic fit', the baseline analysis for Gatwick, does not take into account the effect of building an additional runway at Heathrow. This is important in understanding the implications for the area around Gatwick, both in terms of airport related employment and catalytic employment. A new runway at Heathrow could shift the balance between the airports in terms of their attraction to new and existing companies.

5.6 The Commission considers that this scale of growth would not be sufficient to change significantly the local economy or add substantial pressure on the local area. However, such job growth numbers, particularly at the larger end of this scale and given continuing existing local unemployment levels of between 1-2% pose questions of where the additional personnel are to come from and about the effects on housing and staff transport.

5.7 The employment forecasts are significantly lower than those used for Heathrow, reflecting, at least in part, the different characters of the airports. Gatwick, with its focus on point to point and low-cost sectors has a higher ratio of passengers to employees and this is forecast to continue. Whilst this may prove to be the case, the development of Gatwick as a two runway airport is likely to result in changes to its character – an increase in the amount of long haul travel and, possibly new 'alliances' as airlines seek to maximise the benefits of the new capacity. This may result in a progressive lowering of the passenger to employee ratio and greater levels of employment than suggested by the Commission.

5.8 The Commission notes that the employment structure for an expanded airport, with its focus on lower skilled jobs fits with the current skills structure of the workforce within Crawley. This issue is considered in sections 2.1 and 2.2 of this response to which reference should be made with respect to this question.

5.9 The Commission acknowledges that provision of premises to meet new employment needs may be constrained in the immediate vicinity of the airport. However it considers that there should not be an issue within the wider area. Given that with

runway 2 there will be firms from within the boundary of the expanded airport which will need to be relocated and other firms which will either expand or come to the area to service the increased capacity of the airport, this is an issue which the Commission needs to consider further. Whilst, there may be potential to accommodate business premises in the wider area as a whole, space for businesses which need to be close to the airport will have to be found. Horsham, given its proximity and easy access to Gatwick, may be a location for such businesses and the effects needs to be understood.

5.10 The Council asks the Commission:

- To undertake an assessment of the changes in employment which could occur at Gatwick if a new runway was built at Heathrow.*
- To review the scale of future employment growth at Gatwick with a second runway to take into account the potential for lowering of ratios between passengers and employees as the character of the Airport changes.*
- To amend its analysis to take into account the different skills structure of the areas around Crawley from which, given the physical constraints on the growth of Crawley, a significant proportion of any increase in the Gatwick workforce would be drawn.*
- To note that there is currently limited space to meet the need for further airport related development and to examine how this would be accommodated including the pressures this could place on rural areas and communities in reasonable proximity of the airport.*

Local Economy (Housing and Social Infrastructure)

5.11 *The pressure which growth at Gatwick will place on the housing market and the scale of new housing provision is a major issue for the surrounding area, and in particular Horsham and the Commission needs to review its analysis in a number of respects.*

5.12 *Whilst the uncertainty over the pace at which Gatwick would grow with a second runway, inevitably creates a range of potential housing numbers, the Commission should consider in more detail the factors which could influence the scale of housing need in order to provide a more robust assessment of the implications. This was done by GAL in the preparation of its submission and should be possible to create in an additional independent assessment. This in turn would enable factors which are currently used by the Commission as examples of how housing numbers might be reduced to be properly understood and tested. The Commission should also look more closely at the future relationship between the supply of and demand for labour in the local economy in order to understand the scale of the additional pressures which a new runway would impose on the housing market.*

5.13 *In its assessment, the Commission recognises that in reality, housing needs will not be met evenly across the 14 local authority areas but nevertheless continues to use this as “a reasonable assumption to make at this point”. Whilst it would not be appropriate for the Commission to seek to identify where and how housing provision would be made, it is important that, in its assessment, it recognises that, even if a proportion of the workforce needs are met through longer distance commuting, the primary pressures will fall on those areas closest to Gatwick. This would be the case*

whatever the skills structure, but is highlighted by the forecast skills structure which focuses on employees who are less likely to wish to or afford to commute significant distances. Given the price of housing within the District and the skills structure of employment at the Airport, it is likely that this will place pressures on both market and affordable housing.

5.14 There is concern that the Commission has overestimated the capacity of the area to accommodate housing growth in a sustainable way. Whilst it recognises that some local authorities currently struggle to meet their housing targets, the assumption is that future growth, some of it already planned, should be sufficient to meet needs. Given that areas further north are constrained by Green Belt, the North West Sussex housing market area, is likely to experience significant pressures from any growth at Gatwick. This problem is highlighted by the incorporation into the Commission's assessment of developments already identified to meet the area's current needs and of potential sites within Crawley which would not be available in the event of a second runway being built. Crawley is already identifying a 40% shortfall in terms of its ability to meet housing needs, and both Mid Sussex and Horsham Districts, also face challenging decisions in order to meet their existing assessed needs. The Commission needs to undertake a fuller assessment of housing issues before it concludes its final assessment.

5.15 Issues relating to Social Infrastructure are dealt with separately in paragraphs 2.3 and 2.4 of this response, to which reference should be made with respect to this question.

5.16 The Council asks the Commission:

- To reassess its analysis of the housing implications of a second runway at Gatwick to incorporate:
 - A fuller assessment of the factors which will influence the scale of housing requirements.*
 - A review of where housing pressures both in terms of market and affordable housing will fall and an adjustment of the analysis accordingly.*
 - Recognition of the constraints which exist at Crawley and the implications this has for the housing market areas around Gatwick.**
- To note the Council's concern that the Commission has overestimated the capacity of the areas around Gatwick to meet the need for new housing development in a sustainable way.*

Surface Access

5.17 The Council notes the major infrastructure requirements needed to support a second runway at Gatwick. The Council considers this has not been fully addressed and asks that the Commission rigorously examines all aspects of this, notes them in detail, examines the realistic feasibility of workable solutions and fully costs them before any decision is made. Issues relating to Surface Access are dealt with further in paragraphs 2.5 to 2.8 to which reference should be made with respect to this question.

Noise

5.18 *Issues relating to noise are covered in paragraphs 2.9 to 2.13 to which reference should be made.*

Other Environmental and People Issues

5.19 *With a second runway, the Airport would extend into Horsham District, covering an area north of Charlwood Road and either side of Bonnetts Lane. The area is rural in character and includes a small area of Ancient Woodland adjacent to Bonnetts Lane. The Grade 2 Listed building, Old Bonnetts Cottage, would also be lost along with a number of other properties either side of Bonnetts Lane. Whilst there are no ancient monuments with in the extended airport, the Ifield Court medieval moated site is adjacent to the boundary and its setting would be affected by the proximity of the airport, including a new noise bund and the diverted River Mole. GAL has pledged to replace ancient woodland on a 3:1 basis.*

5.20 *In its pledges GAL has committed to schemes which support property owners whose properties would be within the area needed for the expansion of the airport or would be seriously affected by noise (within the 66dBLeq contour). This would help address some of the market issues which are likely to be experienced if Gatwick were to be selected for a second runway.*

5.21 *The Commission's quality of life assessment, whilst of interest, needs significantly more work if it to form part of a robust appraisal. In particular it should look at the effects of changes on quality of life, as there is likely to be a significant difference between the views of those who move into an area and those who experience a change in their living environment.*

5.22 *The Council asks the Commission:*

- *to note the Council's concern at these environmental impacts on the District of a second runway*
- *to review its quality of life assessment to take into account the effects on people and communities which experience changes in the environment in which they live from a second runway.*

Costs and Operation Viability

5.23 *Issues relating to Surface costs and operational viability are dealt with in paragraphs 2.14 to 2.15 of this response to which reference should be made.*

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

Answer:

6.1 *The Commission is asked to refer to the comments contained throughout this response.*

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

Answer:

7.1 The Commission is asked to refer to the comments contained throughout this response.

Appendix 2

Consequences of the Proposed Action

What are the risks associated with the proposal?	If the Council fails to comment on the consultation the views of the District will not be represented. No risk assessment needed.
How will the proposal help to reduce Crime and Disorder?	Not applicable
How will the proposal help to promote Human Rights?	The consultation has been prepared at a District wide level taking into account all residents in the District.
What is the impact of the proposal on Equality and Diversity? No Equalities Impact Assessment attached- Not relevant	The consultation has been prepared at a District wide level taking into account all residents in the District.
How will the proposal help to promote Sustainability?	The response to the consultation considers the impact of the proposal on the District from a social environmental and economic perspective.

Report to Council

21st January 2015

DECISION REQUIRED

Not exempt



**Horsham
District
Council**

Response to the Airport Commission's Consultation on additional runway options in the South East of England

Executive Summary

- In September 2012, the Government announced the establishment of an Airports Commission to examine the scale and timing of the steps needed to maintain the UK's status as Europe's most important aviation hub. The Commission concluded that a new runway would be needed in the South East of England by 2030. Three final options were identified, two at Heathrow and one at Gatwick.
- The Commission has published its assessment of the three options and there is a 12 week consultation period ending on the 3rd February 2015. The Commission intends to present firm recommendations to the government shortly after the general election in May 2015.
- The Commission's appraisal covers a wide range of issues and addresses matters which are of national as well as local significance. Any decision to build a second runway at Gatwick would have a major impact on the physical, social and economic environment of the District and it is important that the Commission has a clear response from the Council on the issues which affect its area.
- The Council supports policies that provide both economic growth and jobs in the district, however, a second runway at Gatwick is forecast to provide an unprecedented impetus to the economic development of the surrounding area and the Council believes that the negative effects of this have not been sufficiently addressed.
- It is not the purpose of this report to examine in detail or to support either of the Heathrow options.
- Our focus in responding is to ensure that when the Commission makes its final recommendations, it is well informed on issues that are of particular concern to the District Council and the local community. In particular:
 - i. measures to address the wider infrastructure issues – especially surface access
 - ii. the impact on future housing demand and development
 - iii. environmental impact and inconvenience – in particular noise

Recommendations

The Council is recommended to endorse a response from the Council Leader to the Commission, based on this report, which:

- a) States that after full consideration of the Gatwick option, the Council has concluded that because of the very considerable detrimental effect that a second runway is likely to have on the physical, social and economic environment and on the character of the district, it does not support the Gatwick option.
- b) Provides detailed comment designed to help the Commission understand the Council's concerns, as set out in this paper,
- c) Provides an indication of action that the Council considers necessary, should it be concluded that Gatwick is the preferred option, including more effective measures to reduce or mitigate the impacts of a second runway at Gatwick and development associated with it.

Reasons for Recommendations

This Consultation by the Airports Commission is the opportunity for the Council to comment and question the Commission's detailed assessment work to date, and to respond to the Commission's conclusions on the shortlisted options. This is the opportunity to provide the view of Horsham District re some of the Commission's conclusions, to highlight key issues which have not been addressed, and to identify additional infrastructure or mitigation that should be provided if a second runway at Gatwick is recommended.

Background Papers:

Consultation Document - Gatwick Airport Second Runway, Heathrow Airport Extended Northern Runway, Heathrow Airport North West Runway. November 2014

<https://www.gov.uk/government/consultations/increasing-the-uks-long-term-aviation-capacity>

Various Supporting Background documents -

<https://www.gov.uk/government/news/airports-commission-publishes-consultation-on-shortlisted-options-for-a-new-runway>

Answers to consultation questions and HDC covering letter (Draft)

Consultation: None required as it is a consultation response

Wards affected: All

Introduction

This report takes each area of assessment and divides it into the factual details, the Council's commentary and, where appropriate, and requests of specific actions it would like the Airports Commission to consider.

The purpose of this report

- 1.1 The Airports Commission has suggested three final options for an additional runway for the South East of England. It will be for the Commission to weigh the issues and make its recommendations to the government after the forthcoming general election. The final decision will be made by the next government and not by us or any other Council. Nevertheless, any decision in favour of expanding capacity at Gatwick would have a major impact on the Horsham District and it is important that the Commission has a clear response from the Council on issues which concern us should that be the recommendation. It is for this reason that this report is focused on the Airports Commission's Gatwick option. Should the incoming government decide on a Heathrow option then there should be further work by the Airports Commission in consultation with Gatwick local authorities to look at the implications of that decision.

Background

- 1.2 The Government announced its establishment of an Airports Commission in September 2012. Its remit, as summarised in the Government's Aviation Policy Framework, published in March 2013 is to:

"examine the scale and timing of any necessary steps to maintain the UK's status as Europe's most important aviation hub and identify how any need for additional capacity should be met in the short, medium and long term".

- 1.3 The Commission published an interim report in December 2013 which concluded, amongst other things, that, whilst the UK faces no immediate capacity crisis in its airports system, *"there is a case for at least one net additional runway in London and the South East by 2030"* and that there is likely to be a demand case for a second runway by 2050. From a raft of proposals submitted to it, the Commission selected three options which warranted detailed consideration:

- Gatwick: a new runway set sufficiently south of the existing runway to allow fully independent operation
- Heathrow (1): a new runway to the northwest of the existing airport set sufficiently apart to permit fully independent operation
- Heathrow (2): an extension to the existing northern runway to the west, lengthening it sufficiently for it to be operated as two separate runways, one for departures and one for arrivals

Commentary

- a. *At this stage, a number of other options in the South East were ruled out, together with an option for expanding Birmingham Airport. Proposals for a new airport in the Inner Thames Estuary were looked at further but subsequently rejected.*

- b. To enable the three options to be assessed, the Commission established and consulted on a detailed appraisal framework. The Commission has now completed its assessment and is consulting on the results of its work. Once it has considered all the views expressed, the Commission intends to complete its final report and recommendations in the summer of 2015.*

2 Statutory and Policy Background

Statutory background and Government Policy

- 2.1 Central Government makes decisions about major infrastructure including future aviation policy. In December 2003 the Government issued the Aviation White paper “The Future of Air Transport”. No decisions on additional runways have been made and in September 2012, through a Ministerial Statement, it was announced that an independent commission would be set up to make a recommendation to Government. The Airports Commission was required to engage openly with interested parties and member of the public. The Government will consider how to respond to the recommendations of the Airports Commission and how it forms future national aviation policy. In March 2013, the Government published an Aviation Policy Framework, which provides the policy context within which the work of the Commission sits.

Relevant Council policy

- 2.3 The Leader will be responding to the consultation on behalf of the Council.

3 The Current Consultation

- 3.1 The consultation is set against the background of the Commission’s initial conclusions that there will be a need for additional runway capacity in the South East of England by 2030. Those conclusions do not form part of the current consultation which is focused on the three shortlisted options put forward by the promoters at Gatwick or Heathrow and it is not proposed that the Council should comment on these wider issues.
- 3.2 The Consultation is based on the framework established in 2014 and is intended to enable a fair and comparable assessment of the options. It covers a range of social, economic, transport and environmental issues as well as the 'strategic fit' of each option, its anticipated costs and its deliverability.
- 3.3 The Commission has recognised that there is considerable uncertainty over the way in which the aviation sector and indeed the wider UK and Global economy will develop. To allow for this, it has set the assessment of each option within a series of different scenarios, each of which impacts on the benefits, impacts and feasibility of the shortlisted options.

Commentary

- a. *The nature of the Commission's assessment does not make it easy to identify, in detail, the implications which a new runway at Gatwick would have on the local area. The range of scenarios used by the Commission results in markedly different outcomes. The Commission does not indicate whether it considers one of the scenarios to be more likely than the others and advises against assuming a mid-case option.*
- b. *In this context, a local response needs to recognise the uncertainty, but be set within the context of what could happen if the Airport were to grow at the fastest rate identified by the Commission.*

4 The Gatwick Option

- 4.1 The Gatwick option, as described by the Commission, is based on a new southern runway, separated from the existing runway by 1,045 metres, with a new terminal, sufficient to accommodate up to around 50 million passengers per annum (mppa), between the two runways. This generally aligns to option 3 put forward by the airport operator at Gatwick - GAL (Gatwick Airport Limited). It includes a range of surface access improvements, some of which form part of the Commission's 'baseline' - schemes identified as either already agreed and funded or reasonably expected in order to meet the background growth in demand for travel, whilst others are directly related to the scheme put forward by GAL. The scheme-specific schemes relate primarily to road improvements or changes in the vicinity of the airport.
- 4.2 The new runway would be constructed primarily within Crawley, covering an area designated as safeguarded for a possible second runway in the 2003 Government White Paper on Aviation. The extended airport would cover what is currently open land between the current Gatwick Airport and the north of Crawley but would incorporate a number of business premises at Lowfield Heath, the 'Beehive' and on the northern edge of Manor Royal. To the east, the airport would extend to the edge of the M23, South of Junction 9. To the West it would extend into Horsham District incorporating an area of countryside and properties in Bonnetts Lane and Charlwood Road.

5 Strategic Fit

- 5.1 A second runway at Gatwick would provide capacity for an extra 280,000 air traffic movements, sufficient to meet the Commission's assessment of need for new capacity by 2030. It provides for the largest increase in capacity of the three options. Across the range of scenarios this would see between 60 and 96 million passengers per year passing through Gatwick airport by 2050.

Commentary

- a. *The Commission says that Gatwick has the potential to deliver substantial benefits in terms of the UK's overall connectivity. However the scale and nature of that growth varies significantly depending on the scenario applied to Gatwick airport. Whilst there is a similar analysis for Heathrow, the variations are somewhat smaller, reflecting perhaps the established status of Heathrow and its perceived potential to offer capacity for both low cost and network carriers.*

- b. *Whilst the assessment includes a commentary on the competition between airports in the South East, it does not analyse in any detail the impact of growth at one airport on the future of the others as a result of an additional runway. This is an issue which has been raised by local authorities in the Gatwick area before and is a factor which the Commission should take into account when it makes its final recommendations.*
- c. *The Commission's cautious approach towards the potential growth of freight traffic through Gatwick reflects the comparatively modest level of freight passing through it at present and the requirement for significant third party investment if further growth is to take place. By contrast, Heathrow with its strong existing role in the cargo sector is seen as well placed to grow. If Gatwick was to grow its freight traffic, the increased scale of cargo operations would have consequences for local employment, land and infrastructure and this is not addressed by the assessment.*
- d. *The Commission's conclusions regarding, local and regional development strategies, need to be tempered. There is a lack of a cohesive regional plan for the wider Gatwick area, and, whilst local strategies seek to boost the economy of their areas, they do not, provide for the scale of growth and change which would be associated with a new runway.*

5.2 The Council asks the Commission:

- To extend its analysis of the 'strategic fit' of the three options to include an assessment of the impact of a new runway at Heathrow on Gatwick and the other airports in the South East.
- To review its assessment of the scale of freight which might pass through Gatwick with a second runway, and the consequential implications for local employment and transport, taking into account the potential changes in the character of the airport over a long period.
- To note that the scale and nature of growth associated with a new runway at Gatwick has not been factored into current economic and planning strategies and that a wider Gatwick sub regional plan taking into account all scenarios is needed if there is a second runway at Gatwick, given the significant adaptation that would be required locally.

6 The Economy

- 6.1 At a national level, and using what the Commission describes as its microeconomic approach (and assuming that carbon emissions from aviation are addressed through carbon trading) the Commission estimates transport efficiency benefits of between £3.7 billion and £44.1 billion plus benefits from reduced delays equivalent to between £0.73 and £1.78 billion. Under its macroeconomic approach, considering the national economy as a whole the Commission estimates benefits to the economy in a range of between £42 billion and £127 billion.

Commentary

At this national level, the scale of the benefits deriving from a new runway at Gatwick are assessed to be significantly less than those which might accrue from the Heathrow options. The methodology which has resulted in these conclusions is likely to be the subject of considerable scrutiny by the promoters of the schemes and by regional and national organisations. For the purposes of a local response, however, the results have been noted but not examined in detail.

7 Local and Regional Economy

- 7.1 As with possible passenger numbers, the different scenarios used by the Commission, create a wide range for employment generation. By 2050, without a second runway, employment is forecast to fall under all scenarios as a result of ongoing productivity improvements. A second runway is forecast to generate between 500-23,600 extra jobs by 2030 and 7,900-32,600 extra jobs by 2050.
- 7.2 Including the wider catalytic effects of a second runway at Gatwick (jobs created because of the opportunities that access to an expanded airport bring), the Commission suggests that a total 49,600 new jobs could be created by 2050 (25,100 in London and the South East and 21,500 in the rest of England) and 90,400 by 2060. The potential for economic activity generally to be attracted to the area around the Airport itself is recognised but how far this develops into extensive clustering of businesses is, the Commission suggests 'difficult to anticipate'

Commentary

- a. *As with the assessment of the 'strategic fit', the baseline analysis for Gatwick, does not take into account the effect of building an additional runway at Heathrow. This is important in understanding the implications for the area around Gatwick, both in terms of airport related employment and catalytic employment. A new runway at Heathrow could shift the balance between the airports in terms of their attraction to new and existing companies and the Commission should be asked to consider this further.*
- b. *The Commission considers that this scale of growth would not be sufficient to change significantly the local economy or add substantial pressure on the local area. However, such job growth numbers, particularly at the larger end of this scale and given continuing existing local unemployment levels of between 1-2% pose questions of where the additional personnel are to come from and about the effects on housing and staff transport.*
- c. *The employment forecasts are significantly lower than those used for Heathrow, reflecting, at least in part, the different characters of the airports. Gatwick, with its focus on point to point and low-cost sectors has a higher ratio of passengers to employees and this is forecast to continue. Whilst this may prove to be the case, the development of Gatwick as a two runway airport is likely to result in changes to its character – an increase in the amount of long haul travel and, possibly new 'alliances' as airlines seek to maximise the benefits of the new capacity. This may result in a progressive lowering of the passenger to employee ratio and greater levels of employment than suggested by the Commission.*

- d. *The Commission notes that the employment structure for an expanded airport, with its focus on lower skilled jobs fits with the current skills structure of the workforce within Crawley. Given that a significant proportion of any increased workforce will be drawn from beyond Crawley's boundaries, this creates an issue for neighbouring authorities, such as Horsham District, which have a workforce with a different skills structure. The proposal by GAL to commit to 2,500 new apprenticeships is welcome, but, in the light of the Commission's forecasts, should be extended so that lower skilled workers wherever they are drawn from are able to develop the skills to compete in a wider employment market and are not tied to the lower skilled opportunities at Gatwick.*
- e. *The Commission acknowledges that provision of premises to meet new employment needs may be constrained in the immediate vicinity of the airport. However it considers that there should not be an issue within the wider area. Given that with runway 2 there will be firms from within the boundary of the expanded airport which will need to be relocated and other firms which will either expand or come to the area to service the increased capacity of the airport, this is an issue which the Commission needs to consider further. Whilst, there may be potential to accommodate business premises in the wider area as a whole, space for businesses which need to be close to the airport will have to be found. Horsham, given its proximity and easy access to Gatwick, may be a location for such businesses and the effects needs to be understood.*

7.3 The Council asks the Commission:

- To undertake an assessment of the changes in employment which could occur at Gatwick if a new runway was built at Heathrow.
- To review the scale of future employment growth at Gatwick with a second runway to take into account the potential for lowering of ratios between passengers and employees as the character of the Airport changes.
- To amend its analysis to take into account the different skills structure of the areas around Crawley from which, given the physical constraints on the growth of Crawley, a significant proportion of any increase in the Gatwick workforce would be drawn.
- To note that there is currently limited space to meet the need for further airport related development and to examine how this would be accommodated including the pressures this could place on rural areas and communities in reasonable proximity of the airport.
- To seek to mitigate the impact of any growth in unskilled employment through an increase in the number of apprenticeships in Gatwick's proposed community pledges.

8 Housing and Social Infrastructure

- 8.1 The Commission estimates that a new runway would generate a need for between zero and 18,400 additional households, of which 13,500 would be generated by the 'direct' employment needs of the airport. It identifies a number of reasons why the amount of housing is unlikely to need to match this figure (including issues relating to population growth, net migration, unemployment and commuting) but does not explore these in detail.

- 8.2 Whilst recognising that, in reality, there would not be an even split across the 14 local authority areas closest to Gatwick, the Commission comments that if this were to happen it would constitute an increase of up to 130 homes per year per authority between 2020-2030. Even at the higher end, and recognising that many local authorities currently struggle to meet housing targets, the Commission considers the housing to be deliverable with 'land availability unlikely to be affected by Green Belt issues'.
- 8.3 The Commission notes that new housing and households would need to be supported by additional social infrastructure; its assessment indicates the need for additional form entries in local schools and two additional GPs per authority.

Commentary

- a. The pressure which growth at Gatwick will place on the housing market and the scale of new housing provision is a major issue for the surrounding area, and in particular Horsham and the Commission needs to review its analysis in a number of respects.*
- b. Whilst the uncertainty over the pace at which Gatwick would grow with a second runway, inevitably creates a range of potential housing numbers, the Commission should consider in more detail the factors which could influence the scale of housing need in order to provide a more robust assessment of the implications. This was done by GAL in the preparation of its submission and should be possible to create in an additional independent assessment. This in turn would enable factors which are currently used by the Commission as examples of how housing numbers might be reduced to be properly understood and tested. The Commission should also look more closely at the future relationship between the supply of and demand for labour in the local economy in order to understand the scale of the additional pressures which a new runway would impose on the housing market.*
- c. In its assessment, the Commission recognises that in reality, housing needs will not be met evenly across the 14 local authority areas but nevertheless continues to use this as "a reasonable assumption to make at this point". Whilst it would not be appropriate for the Commission to seek to identify where and how housing provision would be made, it is important that, in its assessment, it recognises that, even if a proportion of the workforce needs are met through longer distance commuting, the primary pressures will fall on those areas closest to Gatwick. This would be the case whatever the skills structure, but is highlighted by the forecast skills structure which focuses on employees who are less likely to wish to or afford to commute significant distances. Given the price of housing within the District and the skills structure of employment at the Airport, it is likely that this will place pressures on both market and affordable housing.*
- d. There is concern that the Commission has overestimated the capacity of the area to accommodate housing growth in a sustainable way. Whilst it recognises that some local authorities currently struggle to meet their housing targets, the assumption is that future growth, some of it already planned, should be sufficient to meet needs. Given that areas further north are constrained by Green Belt, the North West Sussex housing market area, is likely to experience significant pressures from any growth at Gatwick. This problem is highlighted by*

the incorporation into the Commission's assessment of developments already identified to meet the area's current needs and of potential sites within Crawley which would not be available in the event of a second runway being built. Crawley is already identifying a 60% shortfall in terms of its ability to meet housing needs, and both Mid Sussex and Horsham Districts, also face challenging decisions in order to meet their existing assessed needs. The Commission needs to undertake a fuller assessment of housing issues before it concludes its final assessment.

- e. *In terms of the community infrastructure needed to support housing growth, it is reasonable to expect a contribution from house builders, particularly towards the provision of local facilities and GAL has itself pledged a further £46.5 million. However, given that the Commission's estimate of the number of houses needed is currently twice GAL's, the amount provided as a result of expansion at Gatwick airport should be increased. Moreover, the Commission should recognise that this will not be sufficient to address strategic needs in the area, particularly those relating to increased or new secondary school facilities in the areas most affected by increased housing pressure and access to hospitals. Access to hospitals is already a concern in the northern part of West Sussex and the problems will be exacerbated by further population growth linked whether directly or indirectly. The need for a commitment from the Government to a new hospital to serve the area should be incorporated into any recommendation from the Commission for a new runway at Gatwick.*

8.4 The Council asks the Commission:

- To reassess its analysis of the housing implications of a second runway at Gatwick to incorporate:
 - A fuller assessment of the factors which will influence the scale of housing requirements.
 - A review of where housing pressures both in terms of market and affordable housing will fall and an adjustment of the analysis accordingly.
 - Recognition of the constraints which exist at Crawley and the implications this has for the housing market areas around Gatwick.
- To note the Council's concern that the Commission has overestimated the capacity of the areas around Gatwick to meet the need for new housing development in a sustainable way.
- To review the level of commitment that would be needed to new social infrastructure with a new runway, to include:
 - Recognition of the additional costs and land needed for providing secondary education and other services which serve the growing population at a strategic level.
 - The need for a formal commitment from the Government to the provision of a new hospital to serve the north West Sussex area.
 - An increased contribution from GAL or a future airport operator to reflect the higher housing numbers indicated by the Commission.

9 Surface Access

- 9.1 For each of the options, the Commission has produced a baseline which sets out the transport schemes which, it considers, will be needed to accommodate background growth whether or not there is an additional runway. For Gatwick this includes enhanced capacity on the Brighton Main Line (both planned over the next

few years and projected for the longer term) and improvements to the M23 between Junctions 8 and 10 (to create a 'managed motorway'). In addition the Commission identifies the transport investment which it sees as directly related to the construction of a new runway. These relate primarily to the access to the airport, the realignment of the A23 South of the Airport and the re-provision of Balcombe Road to the eastern edge of an extended Airport. GAL has also incorporated a diversion to Charlwood Road around the western end of the extended Airport and has pledged to contribute £10million to help improve the local road network where Gatwick is a contributor to traffic.

- 9.2 The Commission considers that, provided the improvements it identified in its baseline are delivered, there will be sufficient rail capacity to accommodate a second runway, although further upgrades are likely to be needed in the 2040's. Planned and anticipated national investment in the M23 and M25 are also considered sufficient.

Commentary

- a. The Commission's assessment is based on an assumption that schemes to meet background growth in demand for travel will be delivered. It would be essential, therefore that there is a firm commitment from the Government to these schemes and a timetable for their implementation. Moreover, it is of concern that, even though the primary driver for improvement is background growth, part of the capacity to be provided will be used up by expansion of the airport and the associated business and residential development. This will inevitably bring forward the point at which further improvements will be needed to the network in order to avoid unacceptable levels of congestion. The Commission has already noted that the Brighton Main Line may need further upgrades in the 2040's and it seems likely that improvements will become increasingly difficult, and possibly expensive to deliver.*
- b. Significant reliance is placed on the North-South corridor which contains the M23/A23 and the Brighton Main Line, the Commission should give more consideration to the impacts on other major links in the area, including the Arun valley line railway line, as well as A roads in Horsham (particularly the A264 and the A24), both of which are likely to experience further pressures, both in their own right and as alternatives to the M23/A23. A western relief road for Crawley should also be included, to facilitate access to the airport and to reduce the amount of traffic seeking to use other less suitable routes to the airport.*
- c. Whilst GAL has indicated that it would provide £10 million to a local transport fund, little consideration has yet been given to the impact on local roads. Roads to the west of the airport already experience 'rat-running' particularly at peak times. This is likely to be exacerbated with the increased demand for access to the airport. Further discussions are needed to establish an appropriate size for the fund and who should contribute to it. However, it should include specific provision for addressing problems on local roads as well as at strategic junctions.*

- 9.3 The Council ask the Commission, should the Gatwick option be chosen:
- To seek to ensure that there is a formal commitment at a national level to the strategic road and rail network enhancements set out in its 'baseline'

- To note the Council's concern that much needed capacity improvements to the strategic road and rail network would be, in part, used up by the demands from a second runway and to incorporate into the assessment further improvements which would be needed, partly as a result of a new runway at Gatwick and associated development.
- To incorporate into its assessment the need for commitments to east-west improvements to the strategic road and rail network, including the Arun Valley line, the A24, A264 and a new western relief road at Crawley.
- To include within its assessment the impact of a new runway and associated development pressures on local roads and the need for an enhanced package to address those impacts.

10 Noise

- 10.1 The Commission's analysis indicates that a second runway would lead to a significant growth in the number of people affected by aviation noise in areas close to the Airport. This occurs across a range of different measures of noise disturbance. Maps accompanying the consultation show, in particular, the extension of noise contours to the south, east and west of the airport, affecting neighbourhoods on the northern side of Crawley but also communities such as Rusper.
- 10.2 The Airports Commission accompanying documents also provide, for indicative purposes only, the flight paths which might be associated with a two runway airport. These are important as they show how areas outside the current noise preferential routes could be affected by overflying and disturbance.

Commentary

- Whilst in terms of noise the greatest impact is on the northern part of Crawley, the effects of noise on parts of Horsham District are also a major concern. Maps produced by the Commission show how, without a second runway, noise contours contract as with time and consequent technological advances aircraft generally become quieter. With a second runway, those contours expand significantly. Whilst currently, the contours have a predominantly east-west orientation, with a second runway, contours would extend south, reflecting, in particular, take-off routes. The village of Rusper currently lies outside the 57 dBLA_{eq} 16 hour contour, the level used by the Government as marking the approximate onset of significant community annoyance from aircraft noise. With a second runway, the Commission's forecasts show the village falling between the 57 and 60 dBLA_{eq} contours.*
- The concern extends beyond the formal contours. The recent flightpath trials carried out at Gatwick have demonstrated the impacts of increased overflying on areas and communities which currently enjoy comparatively high levels of tranquillity. In this respect, the average contours used by the Government and the Commission fail to pick up the issue fully. The issue is particularly significant for communities such as Warnham which are comparatively close to the airport, but is also likely to be an issue further away when regular and frequent overflight disrupts the normal tranquillity of a largely rural area.*
- Noise from night flights is recognised by the Commission as an issue. GAL suggested that the northern runway could be used for nightflights. Whilst at this*

stage it is not possible to determine the operational characteristics of an expanded airport, the Commission needs to look at this issue in more detail with a view to establishing clear conclusions which can be translated into operational requirements.

- d. Some mitigation of noise effects can be achieved through noise insulation, although this does not address the outdoor environment. GAL propose to extend their noise insulation scheme to cover the costs of insulation up to £3000 for houses within the 60dB contour. Consideration should be given to extending the scheme to properties falling within the 54dB contour to reflect the impact on properties which are currently experiencing very little disturbance from noise. Similarly GAL's proposed council tax initiative whereby existing residents within the new 57dB contour for a second runway would receive an annual payment of £1,000 towards their council tax, could be extended to houses within the 54dB contour with the level of contribution stepped to reflect the differing levels of disturbance.*

10.3 The Council asks the Commission, should the Gatwick option be chosen:

- To note the Council's concern at the level of noise and disturbance which would be generated by a second runway.
- To review its noise scorecards to take into account the effects of noise on typical days in the summer and winter.
- To take greater account of the impacts of noise on areas and communities which currently experience comparatively tranquil environments and which would be likely to be newly affected by overflying aircraft.
- To incorporate noise mitigation measures and mechanisms for ensuring their delivery, including;
 - an effective regime for limiting and managing night flights, and
 - an increase in the pledges from GAL to include noise insulation and Council tax rebates for properties lying within the 54dB LA_{eq} 16 hour contours.

11 Other Environmental and People Issues

11.1 The Commission recognises that the expansion of Gatwick Airport would have a negative effect on a variety of other local environmental factors, including air quality, landscape, heritage, biodiversity and water but considers that, with good design and delivery these impacts can be significantly reduced. The Commission acknowledges that more work needs to be done on air quality issues to quantify what it sees as a limited risk that there would be a breaching of EU limits at certain locations.

11.2 The Commission includes within its assessment consideration of the impact on people directly affected by a new runway. As part of this the Commission has undertaken a quality of life assessment which suggests that, within 5km of the airport, the overall impact of the airport would be neutral although it recognises that the impacts will vary between communities depending on the balance of positive and negative impacts.

Commentary

- a. With a second runway, the Airport would extend into Horsham District, covering an area north of Charlwood Road and either side of Bonnets Lane. The area is rural in character and includes a small area of Ancient Woodland adjacent to*

Bonnets Lane. The Grade 2 Listed building, Old Bonnetts Cottage would also be lost along with a number of other properties either side of Bonnets Lane. Whilst there are no ancient monuments within the extended airport, the Ifield Court medieval moated site is adjacent to the boundary and its setting would be affected by the proximity of the airport, including a new noise bund and the diverted River Mole. GAL has pledged to replace ancient woodland on a 3:1 basis.

- b. In its pledges GAL has committed to schemes which support property owners whose properties would be within the area needed for the expansion of the airport or would be seriously affected by noise (within the 66dBLeq contour). This would help address some of the market issues which are likely to be experienced if Gatwick were to be selected for a second runway.*
- c. The Commission's quality of life assessment, whilst of interest, needs significantly more work if it is to form part of a robust appraisal. In particular it should look at the effects of changes on quality of life, as there is likely to be a significant difference between the views of those who move into an area and those who experience a change in their living environment.*

11.3 The Council asks the Commission:

- To note the Council's concern at the environmental impacts on the District of a second runway.
- To review its quality of life assessment to take into account the effects on people and communities which experience changes in the environment in which they live from a second runway.

12 Cost and Operational Viability

- 12.1 The Commission estimates the cost of construction, including all associated infrastructure, at £9.3 billion. This is estimated to entail average passenger charges rising from £9 currently to between £15 and £18 with peak charges up to £23. In addition to the above costs, the Commission estimates surface access interventions to cost a further £787 million. Overall, the Commission rates the delivery risks as relatively low.

Commentary

The costs are significantly less than those for the Heathrow options and the level of financing is not considered unprecedented. However, finance could prove challenging given the uncertainty over passenger demand and the raised passenger charges in a competitive environment. This is an issue which is likely to be debated further but not one on which it is proposed the Council comment at this stage. However, the Commission should note that it is essential that, in developing delivery mechanisms, robust processes are put in place to ensure that infrastructure and other commitment needed to address or mitigate the impacts of a new runway and associated development.

12.2 The Council asks the Commission:

- To establish robust mechanisms which ensure that infrastructure and other commitments needed to address or mitigate the impact of any new runway and the associated development would be delivered.

13 Concluding Comments

- 13.1 The Commission has produced a wide-ranging and detailed appraisal of the options. All the main issues have been covered although there are a number of areas where the assessment needs to be extended or altered to provide a more robust basis for a comparison between the options and to ensure that there is a full understanding of the potential implications for the local area. The Commission has invited comments on how the options might be improved and there are a number of ways in which, from the local perspective, this might be achieved, both through commitments to a wider range of infrastructure improvements and enhanced mitigation measures.
- 13.2 In making its final recommendation to the Government, the Commission will have to decide the weight it gives to the various factors which it has been considering and to consider core national objectives as well as local implications. It is not considered appropriate for the Council, operating at a local level, to seek to draw conclusions on these matters. However, taking into account the large range of the outstanding issues and the scale of the likely impact on the environment and character, it is concluded that, as an overarching comment, the Commission should be advised that the Council does not support the Gatwick option.

14 Next Steps

- 14.1 The recommendation of the Council will be sent to the Airports Commission by the 3rd February to meet the consultation deadline. Beyond this point members and officers will continue working jointly with other local authorities in the area and liaising with local community and business groups, Gatwick Airport and the Commission, to ensure that issues of concern to the Council are being fully addressed.

Other Courses of Action Considered but Rejected

This is a single consultation in a series. The alternative is to not respond to the consultation which would be a consequence if the Council failed to make a decision at this meeting. The Council may endorse a different recommendation.

Staffing Consequences

There are no staffing consequences.

Financial Consequences

There are no financial consequences.

Airport Commission's Consultation on Additional Runway Options in the South East of England: Detailed Comments

These are the proposed answers to the questions in the Airports Commission consultation document. (These reflect the comments in the Council report to which this appendix is attached).

Q1: What conclusions, if any, do you draw in respect of the three short-listed options?

Answer:

- 1.1 *The Council supports policies that provide both economic growth and jobs in the district; however, a second runway at Gatwick is forecast to provide an unprecedented impetus to the economic development of the surrounding area and the Council believes that the negative effects have not been sufficiently addressed.*
- 1.2 *After full consideration of the Gatwick option, the Council has concluded that because of the very considerable detrimental effect that a second runway is likely to have on the physical, social and economic environment and on the character of the district, it does not support the Gatwick option.*
- 1.3 *More details setting out the background to this conclusion are contained in the answers to the Commission's specific questions and the report to Council on the 21st January 2015 (attached)*

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

Answer:

Local and Regional Economy

- 2.1 *The Commission notes that the employment structure for an expanded airport, with its focus on lower skilled jobs fits with the current skills structure of the workforce within Crawley. Given that a significant proportion of any increased workforce will be drawn from beyond Crawley's boundaries, this creates an issue for neighbouring authorities, such as Horsham District, which have a workforce with a different skills structure. The proposal by GAL to commit to 2,500 new apprenticeships is welcome, but, in the light of the Commission's forecasts, should be extended so that lower skilled workers wherever they are drawn from are able to develop the skills to compete in a wider employment market and are not tied to the lower skilled opportunities at Gatwick*
- 2.2 *The Commission is therefore asked:
To seek to mitigate the impact of any growth in unskilled employment through an increase in the number of apprenticeships in Gatwick's proposed community pledges.*

Social Infrastructure

- 2.3 *In terms of the community infrastructure needed to support housing growth, it is reasonable to expect a contribution from house builders, particularly towards the provision of local facilities and GAL has itself pledged a further £46.5 million. However, given that the Commission's estimate of the number of houses needed is*

currently twice GAL's, the amount provided as a result of expansion at Gatwick airport should be increased. Moreover, the Commission should recognise that this will not be sufficient to address strategic needs in the area, particularly those relating to increased or new secondary school facilities in the areas most affected by increased housing pressure and access to hospitals. Access to hospitals is already a concern in the northern part of West Sussex and the problems will be exacerbated by further population growth linked whether directly or indirectly. The need for a commitment from the Government to a new hospital to serve the area should be incorporated into any recommendation from the Commission for a new runway at Gatwick.

2.4 The Commission is therefore asked:

To review the level of commitment that would be needed to new social infrastructure with a new runway, to include:

- Recognition of the additional costs and land needed for providing secondary education and other services which serve the growing population at a strategic level.
- The need for a formal commitment from the Government to the provision of a new hospital to serve the north West Sussex area.
- An increased contribution from GAL or a future airport operator to reflect the higher housing numbers indicated by the Commission.

Surface Access

2.5 The Commission's assessment is based on an assumption that schemes to meet background growth in demand for travel will be delivered. It would be essential, therefore that there is a firm commitment from the Government to these schemes and a timetable for their implementation. Moreover, it is of concern that, even though the primary driver for improvement is background growth, part of the capacity to be provided will be used up by expansion of the airport and the associated business and residential development. This will inevitably bring forward the point at which further improvements will be needed to the network in order to avoid unacceptable levels of congestion. The Commission has already noted that the Brighton Main Line may need further upgrades in the 2040's and it seems likely that improvements will become increasingly difficult, and possibly expensive to deliver.

2.6 Significant reliance is placed on the North-South corridor which contains the M23/A23 and the Brighton Main Line, the Commission should give more consideration to the impacts on other major links in the area, including the Arun valley line railway line, as well as A roads in Horsham (particularly the A264 and the A24), both of which are likely to experience further pressures, both in their own right and as alternatives to the M23/A23. A western relief road for Crawley should also be included, to facilitate access to the airport and to reduce the amount of traffic seeking to use other less suitable routes to the airport.

2.7 Whilst GAL has indicated that it would provide £10 million to a local transport fund, little consideration has yet been given to the impact on local roads. Roads to the west of the airport already experience 'rat-running' particularly at peak times. This is likely to be exacerbated with the increased demand for access to the airport. Further discussions are needed to establish an appropriate size for the fund and who should contribute to it. However, it should include specific provision for addressing problems on local roads as well as at strategic junctions.

2.8 *The Council ask the Commission, should the Gatwick option be chosen:*

- *To seek to ensure that there is a formal commitment at a national level to the strategic road and rail network enhancements set out in its 'baseline'*
- *To note the Council's concern that much needed capacity improvements to the strategic road and rail network would be, in part, used up by the demands from a second runway and to incorporate into the assessment further improvements which would be needed, partly as a result of a new runway at Gatwick and associated development.*
- *To incorporate into its assessment the need for commitments to east-west improvements to the strategic road and rail network, including the Arun Valley line, the A24, A264 and a new western relief road at Crawley.*
- *To include within its assessment the impact of a new runway and associated development pressures on local roads and the need for an enhanced package to address those impacts.*

Noise

2.9 *Whilst in terms of noise the greatest impact is on the northern part of Crawley, the effects of noise on parts of Horsham District are also a major concern. Maps produced by the Commission show how, without a second runway, noise contours contract as with time and consequent technological advances aircraft generally become quieter. With a second runway, those contours expand significantly. Whilst currently, the contours have a predominantly east-west orientation, with a second runway, contours would extend south, reflecting, in particular, take-off routes. The village of Rusper currently lies outside the 57 dBLA_{eq} 16 hour contour, the level used by the Government as marking the approximate onset of significant community annoyance from aircraft noise. With a second runway, the Commission's forecasts show the village falling between the 57 and 60 dBLA_{eq} contours.*

2.10 *The concern extends beyond the formal contours. The recent flightpath trials carried out at Gatwick have demonstrated the impacts of increased overflying on areas and communities which currently enjoy comparatively high levels of tranquillity. In this respect, the average contours used by the Government and the Commission fail to pick up the issue fully. The issue is particularly significant for communities such as Warnham which are comparatively close to the airport, but is also likely to be an issue further away when regular and frequent overflight disrupts the normal tranquillity of a largely rural area.*

2.11 *Noise from night flights is recognised by the Commission as an issue. GAL suggested that the northern runway could be used for nightflights. Whilst at this stage it is not possible to determine the operational characteristics of an expanded airport, the Commission needs to look at this issue in more detail with a view to establishing clear conclusions which can be translated into operational requirements.*

2.12 *Some mitigation of noise effects can be achieved through noise insulation, although this does not address the outdoor environment. GAL propose to extend their noise insulation scheme to cover the costs of insulation up to £3000 for houses within the 60dB contour. Consideration should be given to extending the scheme to properties falling within the 54dB contour to reflect the impact on properties which currently experiencing very little disturbance from noise. Similarly GAL's proposed council tax initiative whereby existing residents within the new 57dB contour for a second*

runway would receive an annual payment of £1,000 towards their council tax, could be extended to houses within the 54db contour with the level of contribution stepped to reflect the differing levels of disturbance.

2.13 The Council asks the Commission::

- *To note the Council's concern at the level of noise and disturbance which would be generated by a second runway.*
- *To review its noise scorecards to take into account the effects of noise on typical days in the summer and winter.*
- *To take greater account of the impacts of noise on areas and communities which currently experience comparatively tranquil environments and which would be likely to be newly affected by overflying aircraft.*
- *To incorporate noise mitigation measures and mechanisms for ensuring their delivery, Including;*
 - *an effective regime for limiting and managing night flights, and*
 - *an increase in the pledges from GAL to include noise insulation and Council tax rebates for properties lying within the 54dB LA_{eq} 16 hour contours.*

Costs and Operational Viability

2.14 The Council notes that the costs of the Gatwick Option are significantly less than those for the Heathrow options and the level of financing is not considered unprecedented. However, finance could prove challenging given the uncertainty over passenger demand and the raised passenger charges in a competitive environment. This is an issue which is likely to be debated further but not one on which it is proposed the Council comment at this stage. However, the Commission should note that it is essential that, in developing delivery mechanisms, robust processes are put in place to ensure that infrastructure and other commitment needed to address or mitigate the impacts of a new runway and associated development.

2.15 The Council asks the Commission:

- *To establish robust mechanisms which ensure that infrastructure and other commitments needed to address or mitigate the impact of any new runway and the associated development would be delivered.*

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

Answer:

3.1 The Council notes that the consultation is set against the background of the Commission's initial conclusions that there will be a need for additional runway capacity in the South East of England by 2030. Those conclusions do not form part of the current consultation which is focussed on the three shortlisted options put forward by the promoters at Gatwick or Heathrow the Council should comment on these wider issues.

3.2 The nature of the assessment does not make it easy to identify, in detail, the implications which a new runway at Gatwick would have on the local area. The range of scenarios used results in markedly different outcomes and the Council recognises that the Commission does not indicate whether it considers one of the scenarios to be more likely than the others and advises against assuming a mid-case

option. The Council's response recognises the uncertainty, but is set within the context of what could happen if the Airport were to grow at the fastest rate identified by the Commission.

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

Answer:

4.1 The Commission is considered to have produced a wide-ranging and detailed appraisal of the options. All the main issues have been covered although there are a number of areas where the assessment needs to be extended or altered to provide a more robust basis for a comparison between the options and to ensure that there is a full understanding of the potential implications for the local area. These are detailed in other sections of this response.

Q5: Do you have any comments on how the Commission has carried out its appraisal of specific topics (as defined by the Commission's 16 appraisal modules), including methodology and results?

Answer:

Strategic Fit

5.1 The Council notes that, whilst the assessment includes a commentary on the competition between airports in the South East, it does not analyse in any detail the impact of growth at one airport on the future of the others as a result of an additional runway. This is an issue which has been raised by local authorities in the Gatwick area before and is a factor which the Commission should take into account when it makes its final recommendations.

5.2 The Commission's cautious approach towards the potential growth of freight traffic through Gatwick, reflects the comparatively modest level of freight passing through it at present and the requirement for significant third party investment if further growth is to take place. By contrast, Heathrow with its strong existing role in the cargo sector is seen as well placed to grow. If Gatwick was to grow its freight traffic, the increased scale of cargo operations would have consequences for local employment, land and infrastructure and this is not addressed by the assessment.

5.3 The Commission's conclusions regarding, local and regional development strategies, need to be tempered. There is a lack of a cohesive regional plan for the wider Gatwick area, and, whilst local strategies seek to boost the economy of their areas, they do not, provide for the scale of growth and change which would be associated with a new runway.

5.4 The Council asks the Commission:

- To extend its analysis of the 'strategic fit' of the three options to include an assessment of the impact of a new runway at Heathrow on Gatwick and the other airports in the South East.*
- To review its assessment of the scale of freight which might pass through Gatwick with a second runway, and the consequential implications for local employment and transport, taking into account the potential changes in the character of the airport over a long period.*
- To note that the scale and nature of growth associated with a new runway at Gatwick has not been factored into current economic and planning strategies*

and that a wider Gatwick sub regional plan taking into account all scenarios is needed if there is a second runway at Gatwick, given the significant adaptation that would be required locally.

Local Economy

- 5.5 *As with the assessment of the 'strategic fit', the baseline analysis for Gatwick, does not take into account the effect of building an additional runway at Heathrow. This is important in understanding the implications for the area around Gatwick, both in terms of airport related employment and catalytic employment. A new runway at Heathrow could shift the balance between the airports in terms of their attraction to new and existing companies.*
- 5.6 *The Commission considers that this scale of growth would not be sufficient to change significantly the local economy or add substantial pressure on the local area. However, such job growth numbers, particularly at the larger end of this scale and given continuing existing local unemployment levels of between 1-2% pose questions of where the additional personnel are to come from and about the effects on housing and staff transport.*
- 5.7 *The employment forecasts are significantly lower than those used for Heathrow, reflecting, at least in part, the different characters of the airports. Gatwick, with its focus on point to point and low-cost sectors has a higher ratio of passengers to employees and this is forecast to continue. Whilst this may prove to be the case, the development of Gatwick as a two runway airport is likely to result in changes to its character – an increase in the amount of long haul travel and, possibly new 'alliances' as airlines seek to maximise the benefits of the new capacity. This may result in a progressive lowering of the passenger to employee ratio and greater levels of employment than suggested by the Commission.*
- 5.8 *The Commission notes that the employment structure for an expanded airport, with its focus on lower skilled jobs fits with the current skills structure of the workforce within Crawley. This issue is considered in sections 2.1 and 2.2 of this response to which reference should be made with respect to this question.*
- 5.9 *The Commission acknowledges that provision of premises to meet new employment needs may be constrained in the immediate vicinity of the airport. However it considers that there should not be an issue within the wider area. Given that with runway 2 there will be firms from within the boundary of the expanded airport which will need to be relocated and other firms which will either expand or come to the area to service the increased capacity of the airport, this is an issue which the Commission needs to consider further. Whilst, there may be potential to accommodate business premises in the wider area as a whole, space for businesses which need to be close to the airport will have to be found. Horsham, given its proximity and easy access to Gatwick, may be a location for such businesses and the effects needs to be understood.*
- 5.10 *The Council asks the Commission:*

- *To undertake an assessment of the changes in employment which could occur at Gatwick if a new runway was built at Heathrow.*
- *To review the scale of future employment growth at Gatwick with a second runway to take into account the potential for lowering of ratios between passengers and employees as the character of the Airport changes.*
- *To amend its analysis to take into account the different skills structure of the areas around Crawley from which, given the physical constraints on the growth of Crawley, a significant proportion of any increase in the Gatwick workforce would be drawn.*
- *To note that there is currently limited space to meet the need for further airport related development and to examine how this would be accommodated including the pressures this could place on rural areas and communities in reasonable proximity of the airport.*

Local Economy (Housing and Social Infrastructure)

- 5.11 *The pressure which growth at Gatwick will place on the housing market and the scale of new housing provision is a major issue for the surrounding area, and in particular Horsham and the Commission needs to review its analysis in a number of respects.*
- 5.12 *Whilst the uncertainty over the pace at which Gatwick would grow with a second runway, inevitably creates a range of potential housing numbers, the Commission should consider in more detail the factors which could influence the scale of housing need in order to provide a more robust assessment of the implications. This was done by GAL in the preparation of its submission and should be possible to create in an additional independent assessment. This in turn would enable factors which are currently used by the Commission as examples of how housing numbers might be reduced to be properly understood and tested. The Commission should also look more closely at the future relationship between the supply of and demand for labour in the local economy in order to understand the scale of the additional pressures which a new runway would impose on the housing market.*
- 5.13 *In its assessment, the Commission recognises that in reality, housing needs will not be met evenly across the 14 local authority areas but nevertheless continues to use this as “a reasonable assumption to make at this point”. Whilst it would not be appropriate for the Commission to seek to identify where and how housing provision would be made, it is important that, in its assessment, it recognises that, even if a proportion of the workforce needs are met through longer distance commuting, the primary pressures will fall on those areas closest to Gatwick. This would be the case whatever the skills structure, but is highlighted by the forecast skills structure which focuses on employees who are less likely to wish to or afford to commute significant distances. Given the price of housing within the District and the skills structure of employment at the Airport, it is likely that this will place pressures on both market and affordable housing.*
- 5.14 *There is concern that the Commission has overestimated the capacity of the area to accommodate housing growth in a sustainable way. Whilst it recognises that some local authorities currently struggle to meet their housing targets, the assumption is that future growth, some of it already planned, should be sufficient to meet needs. Given that areas further north are constrained by Green Belt, the North West Sussex*

housing market area, is likely to experience significant pressures from any growth at Gatwick. This problem is highlighted by the incorporation into the Commission's assessment of developments already identified to meet the area's current needs and of potential sites within Crawley which would not be available in the event of a second runway being built. Crawley is already identifying a 60% shortfall in terms of its ability to meet housing needs, and both Mid Sussex and Horsham Districts, also face challenging decisions in order to meet their existing assessed needs. The Commission needs to undertake a fuller assessment of housing issues before it concludes its final assessment.

5.15 Issues relating to Social Infrastructure are dealt with separately in paragraphs 2.3 and 2.4 of this response, to which reference should be made with respect to this question.

5.16 The Council asks the Commission:

- To reassess its analysis of the housing implications of a second runway at Gatwick to incorporate:
 - A fuller assessment of the factors which will influence the scale of housing requirements.*
 - A review of where housing pressures both in terms of market and affordable housing will fall and an adjustment of the analysis accordingly.*
 - Recognition of the constraints which exist at Crawley and the implications this has for the housing market areas around Gatwick.**
- To note the Council's concern that the Commission has overestimated the capacity of the areas around Gatwick to meet the need for new housing development in a sustainable way.*

Surface Access

5.17 Issues relating to Surface Access are dealt with in paragraphs 2.5 to 2.8 to which reference should be made with respect to this question..

Noise

5.18 Issues relating to noise are covered in paragraphs 2.9 to 2.13 to which reference should be made.

Other Environmental and People Issues

5.19 With a second runway, the Airport would extend into Horsham District, covering an area north of Charlwood Road and either side of Bonnets Lane. The area is rural in character and includes a small area of Ancient Woodland adjacent to Bonnets Lane. The Grade 2 Listed building, Old Bonnetts Cottage would also be lost along with a number of other properties either side of Bonnets Lane. Whilst there are no ancient monuments with in the extended airport, the Ifield Court medieval moated site is adjacent to the boundary and its setting would be affected by the proximity of the airport, including a new noise bund and the diverted River Mole. GAL has pledged to replace ancient woodland on a 3:1 basis.

5.20 In its pledges GAL has committed to schemes which support property owners whose properties would be within the area needed for the expansion of the airport or would

be seriously affected by noise (within the 66dBLeq contour). This would help address some of the market issues which are likely to be experienced if Gatwick were to be selected for a second runway.

5.21 *The Commission's quality of life assessment, whilst of interest, needs significantly more work if it to form part of a robust appraisal. In particular it should look at the effects of changes on quality of life, as there is likely to be a significant between the views of those who move into an area and those who experience a change in their living environment.*

5.22 *The Council asks the Commission:*

- to note the Council's concern at these environmental impacts on the District of a second runway*
- to review its quality of life assessment to take into account the effects on people and communities which experience changes in the environment in which they live from a second runway.*

Costs and Operation Viability

5.23 *Issues relating to Surface costs and operational viability are dealt with in paragraphs 2.14 to 2.15 of this response to which reference should be made.*

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

Answer:

6.1 *The Commission is asked to refer to the comments contained throughout this response.*

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

Answer:

7.1 *The Commission is asked to refer to the comments contained throughout this response.*

Appendix 2

Consequences of the Proposed Action

What are the risks associated with the proposal?	If the Council fails to comment on the consultation the views of the District will not be represented. No risk assessment needed.
How will the proposal help to reduce Crime and Disorder?	Not applicable
How will the proposal help to promote Human Rights?	The consultation has been prepared at a District wide level taking into account all residents in the District.
What is the impact of the proposal on Equality and Diversity? No Equalities Impact Assessment attached- Not relevant	The consultation has been prepared at a District wide level taking into account all residents in the District.
How will the proposal help to promote Sustainability?	The response to the consultation considers the impact of the proposal on the District from a social environmental and economic perspective.