

Airports Commission – Consultation Document November 2014

Hever Castle is situated just over 13 miles from Gatwick Airport's current runway and in recent years the disturbance from aeroplanes has escalated to such a degree that we have had more complaints in 2014 than the previous seven years put together. Hever Castle receives approximately 300,000 visitors per year who come from all over the world, as well as from the local area, particularly from London, to enjoy what they expect to be a tranquil day in the countryside, which is not an unreasonable request considering it is within an Area of Outstanding Natural Beauty, as well as to learn about the home of Anne Boleyn. She was the infamous second queen of Henry VIII, responsible for the creation of the Church of England and the mother of Elizabeth I.

In the last two years, which coincides with roughly a doubling in the number of aeroplanes at busy times, we have seen prospective wedding clients turn down Hever Castle as a location for their wedding because of the aircraft noise and indeed the sight of a Boeing 747 coming over our lake. For at least five years now, film companies have steered clear of us as well, because of the inability to film with aeroplanes flying overhead. Traditionally film work has been exceedingly important to heritage attractions, which regularly struggle to make ends meet with their typically high maintenance costs.

Hever Castle cannot be accessed by public transport and relies on people travelling here by car. When the planes are not flying overhead, despite its close proximity to London, there is typically no man-made noise other than the occasional lawn mower. There is not even a 'B' road within a mile of the Castle.

My first observation in responding to this consultation is my initial confusion at trying to understand what the questions mean, principally because, while the questions are set out on a table numbered 1-8, on page 15 it refers to question 2, which is in fact question 3 on the table and again on page 34, question 3 is actually question 4 on the table. I sincerely hope this is a one-off and that other more important questions are not being muddled up.

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

I am principally responding on behalf of Hever Castle, so our answers will primarily refer to Gatwick. However, I do concur with many other commentators that any expansion at Gatwick is not obviously a good thing for Britain. It is on the wrong side of London for the rest of the populous. At least Heathrow is more accessible to the north.

It seems astonishing that Gatwick should be considered at all considering the appalling infrastructure and your report does not seem to offer any proper analysis of the infrastructure requirements. There is reference from Gatwick Airport to improve junctions on the M23, but that is clearly not going to help the M25, which is already regularly at a standstill. I firmly believe that expansion at Gatwick will, far from bringing extra wealth to the south,

potentially risk complete gridlock and stagnation to the south-east. Places like Tunbridge Wells and Tonbridge are not easily accessible to Gatwick. They will suffer the consequences of aircraft noise, but not really have any of the benefits, being too far away to be a reasonable commuter distance for any work. One of the main reasons people set up businesses in Tonbridge and Tunbridge Wells is that they have close links to London, but not the associated noise. They have great schools and beautiful landscape, which are the reasons why people want to live there, but expansion at Gatwick would damage all of that, changing this part of West Kent and East Sussex from a desirable place to live to a 'no-go' area. Businesses in this part of the world trying to transport to other parts of Britain will find it increasingly difficult as, unless the M25 is given at least another lane on each side, there is no way it is going to cope with any expansion at Gatwick.

The costs for this motorway expansion do not appear to have been factored in anywhere and, while Gatwick on paper might look like the cheaper option, if we factor in the costs of the motorway improvements, it suddenly will not look so cheap after all. With this in mind, I am surprised that Stansted has not been given more consideration, as surely the cost of putting in a much improved rail infrastructure would be less than significantly increasing the motorway capacity south of the Thames. It would also mean that those to the north of London would have access to another large airport without having to negotiate the M25. From Hever Castle it takes about an hour to get to Stansted by road without any major hold-ups. I do feel the Commission has completely underestimated the problems of the motorway network. If there were a major accident on the motorway, how on earth would anyone get to Gatwick? There are no other good routes to get there from north of the M23.

It does not look like public transport is an obvious solution either, as I understand that 40% of public transport use for access to an airport is about as good as it gets. The Brighton line is already over-congested at rush hour and is the only railway line into Gatwick.

Question 2 – Do you have any suggestions for how the short-listed options could be improved?

It is not obvious to me how you mitigate the impact of any of the shortlisted airports' runway suggestions. I do, however, think it is important that if a rural approach is effected, especially one that currently does not suffer aircraft noise, home owners should get proper compensation for the loss of value to their property. This would be equitable and it does seem absurd if one has a motorway driven through one's land, one is entitled to a lot of compensation, but for some reason for an aeroplane flight path one is not. In theory a motorway is something one can get used to because of the constant noise, but aircraft noise is completely invasive. Even here at Hever, by the airport's own sound meter's results, the noise can rise as high as 89 decibels at over 13 miles from the airport. With the background of near zero noise, or at least only natural levels, jet engines clearly have a significant impact on those beneath and in particular on residential properties and rural tourist attractions. People living in cities would also hear the aircraft, but I would argue that few move to a city looking for peace and quiet. Certainly very few in a city sit outside in the street looking for

peace and quiet or even in their garden, while many people move from the city to enjoy the peace and natural softer noises of the countryside. City dwellers could be given funds to improve double glazing and those close to airports should be issued with compensation, as I understand is the case.

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

My principal concern is the lack of consideration given to those living further than 5km from the airport, or at least those whose homes would be affected and especially rural based heritage attractions. It is principally the comments from the Gatwick Business Case that give rise to concern in terms of how the Commission has approached this.

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

One factor which I feel has not been fully addressed is the cost of improved infrastructure. Anyone living in the south-east knows that the M25 is not fit for purpose as it stands. I have not had time to read all of the Heathrow information, but with the Gatwick proposal, by 2060 you are talking of 90,000 new jobs. By 2030 you are talking of 18,000 new homes needed; there is no reference to how many houses you will need long term, but clearly 18,000 is nowhere near enough for 90,000 new jobs. Fitting all these people into an already overcrowded south-east seems absurd and would mean the depletion of our Green Belt and sadly the destruction of at least the High Weald Area of Outstanding Natural Beauty, as well as some other AONBs. There is no point in having an AONB if noisy aeroplanes fly overhead all the time. It would be absurd that a business could not build a factory in the countryside because it would make too much noise and have an ugly tower, yet an aeroplane is allowed to fly over it every minute or two, making significantly more noise and being visible to more people for longer. Clearly not all AONBs can be avoided, but efforts should be made to find the least destructive path through these AONBs and possibly even de-list the specific areas affected by aeroplane noise and visual intrusion by planes.

I also believe the Commission has underestimated the impact of all these new homes on the south-east, which even without expansion at Gatwick Airport is under pressure to create more housing. Large infrastructure projects such as this should definitely be made north of London, as that is where we need new jobs, where we need to encourage more businesses to move, or else if we get this huge economic boost to the south-east, it will only further widen the gap between the north and south. This seems to have been completely overlooked, as it is improbable that the south east will ever become an undesirable place to live and we do not need to attract more people to this area. It is already the most densely populated part of Britain.

Question 5 – Do you have any comments on how the Commission has carried out its appraisal of specific topics, as defined by the Commission’s 16 appraisal modules including methodology and results?

I will respond on the specific headings as it will be a better way to convey the Castle’s concerns and much of the information under these topics is what has helped to form the Commission’s consultation document.

1. As already stated, not convinced that building an airport south of the Thames benefits Britain as a whole. Not convinced it benefits the South East other than the immediate surrounding area. It certainly does not benefit those living underneath the flight path. Inter-country connectivity might work from here, however if one has to then connect to Heathrow, the M25 does not allow for a quick connection to Heathrow and I doubt the M23 is able to cope with it either unless significantly widened and I am not aware that there is a direct fast train link between the two. This makes the Heathrow argument stronger as it already has two runways and the more planes in one place means the less dependency there is on the South East’s inadequate infrastructure. There are more options for quick access to more places from Heathrow than from somewhere south of the Thames.
2. Economy impacts – as stated above it is not obvious why the South East needs a boost in jobs. The benefit will be limited by the difficulty of getting to Gatwick Airport for the majority of the population. It would be further limited in Gatwick’s case because of its poor connectivity with Heathrow. More people in Britain will be able to get to Heathrow quicker than they will to Gatwick, albeit improvements need to be made to the M25 approaching Heathrow as well.
3. Local economy impacts – the area around Crawley will benefit at least economically as would those areas immediately around Heathrow. I suspect the majority of new jobs will be relatively low paid. Those on a higher pay scale will choose to live further away and therefore the actual wealth would end up further afield, albeit it would be difficult to get to these airports with the congestion at the moment without expansion.
4. Surface access – as said above. More importantly this does not appear to have been properly costed into any of the Commission’s findings. There are references to the Government doing improvements to the road surface network but no cost attributed. With the number of extra flights envisaged and extra jobs planned, the impact on the already strained transport systems cannot be underestimated.
5. Noise – generally people do not live near an airport expecting peace and quiet and most people affected by Heathrow did not move to West London looking for peace and solitude. However those on the flight path into Gatwick have, other than those who have moved into the area more recently. Studies of noise so far are massively misleading with noise contours usually based on average noise. While many more people will be affected by expansion at Heathrow, the degree of the effect will be significantly less than on those in rural areas affected by expansion at Gatwick. Not enough study has been commissioned on the actual impact of aircraft on a rural

community compared to an urban one. However, the planes do have to go somewhere, in which case further consideration should be given for widening the number of people eligible for compensation, as their homes will decrease in value significantly if previously not under a flight path.

From a rural heritage attraction's point of view, further expansion/intrusion would be disastrous. Unlike a resident who might lose 10-25% of the value of their property, a heritage attraction would be in significantly more trouble. Few heritage attractions break even, principally because of the high repair and maintenance costs. Even a small drop in visitor numbers would have a very detrimental effect. A heritage attraction also cannot relocate. Further consideration should be given to the importance of our heritage attractions. It does seem farcical that the Commission has talked about the detrimental effect on listed buildings in close proximity to the airport's expansion, yet it appears to ignore heritage attractions such as Hever Castle, Penshurst Place and Chiddingstone, which collectively account for over 400,000 visitors a year and would suffer relentlessly from an increase in the number of aeroplanes flying overhead.

It is also interesting to note that Gatwick Airport has dragged their feet on releasing the results of their noise meter at Hever Castle placed here nearly two years ago, with the figures only being released last week. Even then, they were averaged over a month and, as we get few planes when we have an east wind, which we get most months, means that the impact of the noise is dramatically reduced in terms of average noise. The noise meter has at least conceded that the peak noise was 89 decibels, the average is 64. As that average will include a few aeroplanes flying towards the east at a higher altitude, it does a very good job of hiding the true impact that these aeroplanes have on this important part of Britain's heritage. I would ask the Commission to review, should I be able to get a break down of 12-24 days of every single aircraft movement on those days and, as importantly, those evenings. It might finally give us a good example of how bad the impact of the noise is compared to the background of unspoilt countryside. Even then no-one readily has a form of measurement that can separate a relatively loud blackbird singing or trees rustling on a windy day from the intrusive sound of jet aeroplanes.

6. Air quality - it is difficult to see what one can do about air quality. Wherever expansion is, there will be a significant drop in the air quality. This could in theory be partly offset by a green zone where only very low emission cars are allowed access to the airport and the Government working with other governments to put yet more pressure on aircraft manufacturers to create cleaner engines. Air quality issues should consider surface transport as it has recently been discovered that even modern diesel cars release a lot of harmful particulates. As most taxis run on diesel engines, this is a concern.

7. Biodiversity – any airport expansion will have a dramatic effect on biodiversity, with the loss of a great deal of habitat. It is not always easy to replace this habitat, particularly when it is ancient trees. Do bear in mind that green spaces are very important to the population's well-being. Areas where the populous gravitate towards for recreation should be given particular protection/consideration.
8. Carbon – similar issues to Point 6 on air quality.
9. Water, flood and risk – there must be provision made to offset all the tarmac and concrete and reduce damaging run-off/flood.
10. Place – it is surprising that so much wordage is dedicated to how the surrounding area in Gatwick's case will be to a degree spoilt by further tarmac and concrete. Bearing in mind that not many people overlook the airport, this seems insulting and completely out of proportion to the lack of words covering the issue of aircraft flying over Areas of Outstanding Natural Beauty and in particular rural heritage attractions. Not many people overlook Gatwick from either their homes or preferred recreational places. Compare that to the 400,000 visitors who annually come to Hever Castle, Chiddingstone and Penshurst Place (the total number visiting these three venues would be significantly more than the 400,000 which merely represents those entering the paid-for attractions at these three locations). Everybody on the ground for miles around has to look and listen to the aircraft flying overhead, which completely and utterly destroys an otherwise beautiful, peaceful day out in the countryside, enjoying our most beautiful landscape. It is astonishing that so little heed is given to the AONBs, our most protected landscape designation. This protected landscape must be given far greater priority in considering where airport expansion should take place. The High Weald and other AONBs neighbouring London are vital, as places for our capital cities' dwellers and other local people to escape the hustle and bustle of the city without travelling to the West Country, Wales, the Peak District or indeed overseas to get their peace and quiet. If people do go further afield, they will burn a lot more fossil fuel, create more carbon, increase the impact on air quality AND these people will be less happy because they have had to spend longer getting to their bit of peace and quiet, plus it will cost them more, plus they will probably endure delays because the infrastructure is poor.
11. Quality of life – a significant number of people enjoy working in London and choose it as their place of work. They do not all like living there, though, and the fact that there is such a beautiful place to live just south of London in our AONBs definitely gives these people a sense of well-being that they would not have if London were surrounded by noisy places. People do not live in London for peace and quiet; they do live in the countryside for peace and quiet. It is the perfect antidote to a busy, noisy city.

12. Community – impacts on community will include all of the above.
13. Costs and commercial viability – I will leave this for others to answer.
14. Operational efficiency – it is not particularly good for the end user if they cannot make their connections.
15. Operational risk – I will leave this for others to answer.
16. Delivery – it is vital that this is properly costed and modelling is done not just on how the aeroplanes fly around the South East but on the increased pressure on infrastructure, housing, schooling, road and rail network etc. To make such a big decision, some modelling needs to be done and I assume such computer modelling is possible. The airport operators promise such huge business growth and economic benefit, but this needs to be balanced against the existing infrastructure, how that infrastructure could be increased and the cost, and the impact on people's lives. We must not spoil the most beautiful and tranquil areas we have. If we utterly destroy the area around London because it is a constantly noise-invaded space, fewer people will want to come here.

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

Covered in Question 5 above.

Question 7 – Commission's Business Cases

Much of this is covered in Question 5 above. I would like to highlight the following factors:

With 400,000 visitors in total to Hever Castle, Penshurst Place and Chiddingstone Castle each year and the number of visitors to the High Weald Area of Outstanding Natural Beauty being well over 1 million, there does not seem to be much consideration given to these heritage attractions in the Commission's consultation document. My question to the Commission: Is heritage valued so lowly by you? It does seem to be at odds with your interest and concern for the listed buildings which are much closer to the airport, which are not actually open to the public as far as I am aware.

There does not seem to be any consideration for the loss of enjoyment for those visitors to the AONB and these heritage attractions. The Ashdown Forest is another particularly precious habitat that the South East is fortunate to have. Clearly it will not be so special with yet more aircraft flying over it. The long term effects on a wide range of wildlife, much of it rare to the country, has not been properly evaluated. Under the Business Case, it refers to 70 hectares being lost in terms of biodiversity around Gatwick. The true impact on landscape of Gatwick expansion would equate to many multiples of these 70 hectares.

Under 2.5 there is reference to tourism. Again it seems that foreign tourist attractions are more important than British ones. The Commission has completely ignored Hever Castle, Penshurst Place and Chiddingstone Castle to name but three attractions which would be severely affected by Gatwick expansion.

In 2.65, it is insulting to state ... “scheme is also likely to lead to increasing noise levels in a number of areas of modest tranquillity”. The heritage attractions I have mentioned above are utterly tranquil when there is an east wind with no aircraft overflying them, indeed many would say they have high tranquillity.

In 2.67, no reference to the wider impact on heritage.

In 2.97, it seems very wide of the mark. There also seems to be a lack of thought given to the motorway network and what improvements would need to be made. I envisaged that the Commission would do analysis on how many vehicle movements there are on the M25 currently and what congestion that causes and then what impact 90,000 jobs or even half of that would have on that infrastructure and more importantly all those extra flights they are talking about. Only then could we properly determine what is required and then in terms of the costings. Improvements to infrastructure have to be included in those costings.

At 8.1 there is reference to reduced travel times but this does not consider the travel to and from the airport.

In 8.9 there is reference to 50,000-90,000 new jobs, but they are not needed at the moment and it is not obvious where the extra housing and services will be found and how they will be funded. Not too long ago, we had a shortage of water in the South East. How will we supply water to another 90,000-120,000 new homes?

At 8.16, one of the reasons that businesses move to a beautiful area like this is because it has good schools, green space, peace and quiet and is close to London. All of that would be destroyed if we had aeroplanes overflying every minute.

Section 9.0, greater consideration needs to be given to the true impact of noise as referred to earlier at Question 5, point 5.

Under section 11.0, this really should be expanded to landscapes affected by the aircraft noise, as well as those simply moved to make space for tarmac. If people cannot enjoy the beauty of the best areas of biodiversity, the risk is that they will become less important to future generations, which means there is a higher chance they will be lost altogether. Far greater consideration needs to be given to protecting these areas, not just from buildings and concrete but from noise pollution and the unclear impact of emissions on these protected and often quite fragile ecosystems. As referred to earlier, this section is, I feel, insulting because so little, if any, consideration is given to the wider landscape affected by overhead flights. It

surely is a more serious impact than that on the immediate area around Gatwick, which has long lost its importance in terms of landscape value because of the immediate vicinity of so many plane movements and associated traffic.

At 14.5, it refers to 22 heritage assets which have the potential to be impacted by Gatwick's second runway. This does not include those heritage assets which are truly affected. These 22 may need to be removed, either partially or totally, but the very sustainability of the heritage assets underneath the flight path means that their long term future is very much at risk. The impact should certainly be **highly adverse**, not simply adverse.

In 15.4 under Quality of Life, you are only looking at areas within 5km of an airport. Hever Castle, by example, is over 13km from the airport and yet the noise meter has recorded aircraft at 89 decibels. The noise that is mid-60s to mid- to late-70s would be considered a major nuisance and at the higher end of this scale would warrant an investigation from the local authority for nuisance should a neighbour make that amount of noise. A particularly important element to this is how much louder that noise is over the background noise and what type of background noise is it? The impact of an aeroplane over the noise of a motorway is almost negligible and not a nuisance and certainly not nearly as impactful as on/over the sound of rustling leaves and birdsong.

At 15.10, the unquantified impact on local people outside the 5km but within the flight path is misleading. It is clearly negative and not many people living underneath a flight path would feel that the benefits of the airport outweigh the noise impact on their home. I know only too well from my previous career as an Estate Agent that a house situated by a road or within listening distance of a road took a great deal longer to sell than one that was in a quiet location. It would also have sold for a lot less money.

At 16.0 Community – again there is only interest in the immediate community, not those underneath the flight path, who clearly would be adversely affected by expansion.

Question 8 – Any other comments

I apologise for being repetitive but I hope you will take the above points on board and in particular consider the importance of Britain's heritage, the complete inability to replace that heritage and equally our most precious areas of landscape. This is what tourists come to see. Sadly they will not recommend us to others if their day is spoilt by aircraft noise. In a London location there would be no expectation of tranquillity, but a rural attraction simply cannot succeed if it has a persistent regular intrusive noise impact.

As a final note, I have been told by Gatwick Airport Ltd that Hever Castle could be avoided by the aeroplanes altogether. NATS and Gatwick Airport recently put forward a proposal that was turned down because of increased awareness locally of potential for flight paths being changed. That proposal included avoiding Hever Castle at night time, albeit it would

have meant every single aeroplane during the day, which clearly the Castle does not want, although it appears we have a high percentage of them at the moment.

I am told by Tom Denton, Gatwick Airport Ltd, that Hever could be avoided altogether if Heathrow raised the height of its aeroplanes over the south coast, which it is apparently obliged to do under a European directive by 2020. This would not only benefit Hever Castle but also Penshurst Place and Chiddingstone Castle. Indeed Leigh, Bidborough and much of Tunbridge Wells would benefit from this change in flight approach to Gatwick. Very few people would be affected in comparison to those on the current route. I believe the reason this option is not promoted is because if it were adopted, it would then have to be scrapped if a second runway were to be created and these places would then not be able to be avoided.

Hever Castle is therefore fighting on two fronts. A second runway would be our death knell. With the existing runway it would appear there is a very realistic chance that we could be avoided altogether and I suspect if Gatwick's second runway is concluded to be a definite 'no', Hever Castle, Penshurst Place and Chiddingstone Castle can look forward to real peace and tranquillity as is meant to be within an Area of Outstanding Natural Beauty. This would certainly safeguard all of these places futures as venues open to the public and as places for a significant part of the population in Britain to escape to for a bit of peace and tranquillity without them having to spend hours on a motorway, clogging up our roads and creating more pollution.

I sincerely hope Gatwick will be ruled out for a second runway, otherwise you will be signing Hever Castle's death warrant and the Castle will go the same way as its most famous inhabitant!

I look forward to the Commission's findings.

Yours sincerely

Duncan Leslie MRICS
Chief Executive
Hever Castle Ltd

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