

Airports Commission's Consultation on Shortlisted Options for a New Runway Tandridge District Council's Response

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

Council's Comments

The Council's conclusions as far as the Gatwick Airport option is concerned are as follows:

1) This consultation and any proposal for a second runway have to be looked at by the Council in the context of its Aviation Development Policy in the Council's Core Strategy, which is that any expansion of Gatwick Airport beyond the agreed limits that would adversely affect communities in the District by "way of aircraft noise or reduced air quality" will be opposed. As regards environmental issues, "any proposal for expansion beyond the agreed limits would have to be judged with this particular Core Strategy policy in mind" and these issues would need to be addressed when any such expansion is being considered.

2) Likewise other issues, such as infrastructure issues including surface access, would need to be addressed when any proposal for expansion beyond the agreed limits is being considered. In spite of the views of the Airports Commission, concern is raised that neither the road capacity nor the rail capacity will be enough to accommodate the 95 million passengers per annum envisaged.

3) Concern is raised about the impact of the additional 260,000 flights by 2050. This will result in an increasing number of over flights for a specific number of people, causing significant disturbance and distress in rural areas as it can be more annoying than in urban areas where the background (ambient) noise levels tend to be higher than in rural areas. It is considered that the impact of concentrating flight paths has not been properly addressed by the Airports Commission.

4) Concern is also raised about the inadequate size of the proposed £10 million Local Highway Fund for local highway improvements. It is not considered that this will be sufficient when shared amongst the relevant local authorities.

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

Council's Comments

Mitigation Issues

Overall, it is felt that there needs to be more detail on how the many effects of a two runway Gatwick Airport would be mitigated. This is very important to Tandridge District and its residents as many residents in the District would be affected by a larger airport if Gatwick Airport is to be the airport where additional runway capacity is to be provided.

It is clear that if there is to be a second runway at Gatwick Airport, the Council will press to ensure that any negative impacts on the District and its residents are mitigated by suitable infrastructure investment. The need for a well thought out mitigation and community benefits package is paramount. At the very least this should include:

a) Improved services on the Tonbridge-Redhill railway line and the line should be better promoted so that its potential can be realised in order that effective rail links to and from Ashford International with connections to Eurostar services as well as Gatwick Airport can be provided.

b) Improvements to the unattractive and inconvenient set down and waiting facilities for bus and coach users. These facilities, which are a serious disincentive for such modes of public transport, need to be enhanced in the interests of access to and from Gatwick Airport but also in the interests of developing a public transport hub for the wider area.

c) Gatwick Airport Limited working with the relevant local authorities to direct airport related traffic away from using local country lanes such as in nearby areas of Tandridge District. This could be achieved by the designation of appropriate routes to avoid the use of unsuitable country lanes as a short cut to and from Gatwick Airport.

d) Any identified shortfall in provision for car parking being provided for within the airport and not through the establishment of car parks within the Green Belt. In this context the District Council's Core Strategy refers to "the need to minimise the use of the private car to travel to the airport".

e) A new metric to assess aircraft noise being introduced to take account of the number of events. The current LAeq averages the noise over a 16 hour period, and is supposedly equivalent to a steady noise such as a fan operating over the same time period. Aircraft noise is not continuous and is caused by serial one-off events. Whilst it is recognised that more generous noise insulation schemes would reduce aircraft noise levels in living rooms and bedrooms, this only affects noise levels within the home with the windows shut and not the garden.

It is considered important that there is a mechanism for managing the performance of Gatwick Airport against environmental criteria to ensure that the environmental impact of the airport is minimised and mitigated against as far as possible.

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

Council's Comments

No comments

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

Council's Comments

One area the Airports Commission does not appear to have assessed at all is the connectivity issue between Gatwick and Heathrow wherever the new runway is built. It is considered that the Airports Commission needs to be looking at this issue as some consideration needs to be given as to alternative ways to travel between the two airports other than via the M23 and M25.

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?

Council's Comments

As regards air quality, it is considered that the Airports Commission concentrated on transport emissions rather than emissions resulting from Gatwick Airport and accordingly the air quality issue is unresolved even though it is considered acceptable by the Airports Commission.

Although the methodology for noise was comprehensive and robust, concern is raised about its impact being predicted by the Airports Commission as being acceptable.

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

Council's Comments

Local Economy Impacts

Employment

In terms of economic growth, it does seem as though the expansion of Gatwick Airport will provide opportunities for such growth both in terms of employment at the airport itself and within the wider Gatwick Diamond area as businesses locate near to an improved international facility. It is difficult to predict the direct impact of either economic growth or shrinkage on Tandridge District directly without the necessary data about those businesses which rely on the proximity of the airport for their sustainability. It is not clear that there any tangible benefits to the District to balance the significant environmental impacts. Many of the economic benefits are cited on a regional or national basis and there is little evidence of how residents in the District would benefit from some of the additional jobs that could be created as a result of a second runway.

There is significant concern about the number of businesses including many high quality companies (outside of Tandridge District's administrative area), that would need to relocate as a result of construction of a second runway and the associated infrastructure. Although it is recognised that some businesses could relocate to the area to the eastern end of the expanded airport, not all businesses may wish to relocate there and may move outside the wider Gatwick Diamond area.

There is a tension between the potential benefits from additional jobs that a second runway could bring and the need for additional infrastructure and housing to support these jobs. There does seem to be a reliance on levels of in-commuting from other areas to fill the additional jobs. In-commuting can create its own environmental impact as a result of people travelling to and from work at the airport or in jobs associated with the airport. There needs to be continued work on this complex area to more fully understand the impacts and how the issue could be resolved if a second runway was to go ahead.

It is calculated that 67 hectares of employment land would be lost. Gatwick Airport Limited has stated that it would work with businesses to relocate them to alternative premises. No significant details of the number of businesses or the amount of floor space that is lost is provided by the Airports Commission. There is also not any analysis of the feasibility of Gatwick Airport Limited's proposals to relocate businesses to an area within the eastern end of the airport boundary as suggested in its submission. The relocation of businesses also needs to be considered alongside the additional demand for employment floor space which may arise following the construction of a second runway.

Housing & Social Infrastructure

It is considered that the Airports Commission's conclusions on the likely housing numbers and their deliverability are questionable. The majority of authorities in the Gatwick Airport assessment area, particularly Crawley Borough Council, Brighton and Hove City Council and the coastal authorities, are unable to meet their existing objectively assessed housing needs now, and any development sites identified in Local Plans are planned to meet existing needs and not available to address any future additional demand from airport growth.

Crawley Borough Council can only meet 60% of its existing housing and employment needs because of its tightly constrained boundary, physical constraints such as flooding, airport noise to the north and the Area of Outstanding Natural Beauty to the south. The authorities to the north and east of the airport all have extensive Green Belt designations, the Surrey Hills Area of Outstanding Natural Beauty extends across much of the northern area and the High Weald Area of Outstanding Natural Beauty and the South Downs National Park extend across much of the southern area, and much of the narrow coastal strip is constrained by flooding.

The Airports Commission recognises that it is unrealistic to assume growth will be evenly spread across the 14 authorities in the assessment area, but states that it is a reasonable assumption and then base its conclusions of impact on this assumption. The percentage of current airport staff is as low as 1% in some Boroughs/Districts like Eastbourne, Worthing and Adur and long distance commuting is unlikely for many relatively low paid airport jobs. The focus of housing demand will fall to Crawley Borough, where 32% of current airport staff live but, as explained above, there is already an unmet housing need in Crawley Borough.

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

Surface Access

The assessments and modelling carried out by the Airports Commission conclude that sufficient rail capacity is expected to be available to accommodate passengers from a two runway airport. It should be noted that rail passengers associated with the airport only represent less than 2% of total rail passengers on the route between Three Bridges and Redhill. Many of the issues are, therefore, associated with background growth. The Thameslink Programme, which is due to be completed in 2018, will improve capacity by increasing the number of carriages on trains, which together with improvements to junctions and other bottle necks on the rail network, will remove some capacity constraints on the Brighton Mainline. It should be noted that a number of these improvements whilst within the rail industry's future plans do not yet have committed funding. The analysis also suggests that by the 2040s, additional investment is likely to be required to increase capacity due to background growth.

Most of the assessment is concentrated on the issues associated with the Brighton Main Line, which is where most of the capacity constraints occur. However, it is felt that there should be further consideration of the needs and/or potential of the Tonbridge-Redhill, Arun Valley and North Downs railway lines which could add resilience to the network when there are closures or problems on the main line.

As regards rail links, it needs to be emphasised that there is no direct rail link between Gatwick Airport and Kent via the Tonbridge-Redhill railway line. This is a significant issue for the transport corridor to the east of the airport, in particular, on the M25 through Tandridge District in terms of congestion and the consequent impact of such congestion on the A25.

The Airports Commission highlights that the congestion experienced on southern sections of the M25 is a concern to all short listed options although not directly related to the provision of an additional runway at either Gatwick or Heathrow. It is, therefore, important that this wider issue is addressed by the Government. Another wider strategic road issue is the reliance on the M23 as a single strategic highway link to the airport. Consideration should be given to enhancing other strategic road links which could provide an alternative in the event of accidents on the M23 that could lead to its closure.

Improvements are needed in the wider area, for instance, where the A23 and M23 meet at Hooley. Congestion is a significant issue at this location and funding is

needed to resolve the problems caused where these two roads meet. In addition, improvements are necessary at Felbridge where the A22 and A264 meet. Again congestion is a serious issue and needs to be resolved by funding an improvement scheme at this busy junction.

The Airports Commission concludes that the proposed local road network in the Gatwick Airport Limited submission would provide sufficient link capacity to accommodate forecast flows. However, it is acknowledged that more detailed modelling is required to assess the impact of forecast flows at junctions. It is considered that this assessment of junctions is vitally important to the operation of the network in the local area. Furthermore, the analysis seems to have been limited to roads immediately in the vicinity of the airport at the eastern end of its boundary and has not considered the impact of traffic in the wider local area, which will be particularly affected by additional employees accessing the airport. It is noted that some existing roads around the western end of the airport will be closed but the potential impact of this on the local road network is not mentioned. The impact of traffic generated by any additional housing also needs to be taken into account. Although, Gatwick Airport Limited acknowledges the potential for a western relief road around Crawley and that its proposals allow for its construction, there is neither acknowledgement of this issue nor potential funding identified by the Commission. It is felt that more detailed consideration should be made of this issue particularly given that there could be additional housing development in the wider area as a result of a second runway.

The Airports Commission has not commented on whether the size of the £10 million Local Highway Fund for local highway improvements is appropriate to deal with the impact on local roads. It is considered that given the cost of road and junction improvements, this fund shared amongst the relevant local authorities would fund very limited improvements.

The target of 60% for passengers and 50% for staff accessing the airport by means other than the car is welcomed. However, there are concerns about whether this could be achieved at a time in the early morning and late evening when passenger services reduce in frequency.

Even with these targets, there will still be a significant impact on local roads, which the Council considers is not yet fully understood. For local people this is a significant concern and studies should be carried out to understand the impact on local roads and measures put forward to lessen the impact accordingly. Much of the information from Gatwick Airport Limited relates to the wider strategic network rather than the local network which is very important to those people that live near the airport.

Noise and Air Quality

Tandridge District Council's Core Strategy, which was adopted in 2008, has a policy on Aviation Development as follows:

The Council will seek to minimise the impact of Gatwick Airport by working with BAA Gatwick (now Gatwick Airport Limited), Crawley Borough Council and adjoining local authorities on the development of the airport up to the

projected 45 million passengers per annum within the agreed limits of a single runway/two terminal airport. New off-airport parking and extensions to existing sites will be considered in the light of Green Belt policy and the need to minimise the use of the private car to travel to the airport.

The Council will oppose any expansion beyond the agreed limits that would adversely affect communities in Tandridge by way of aircraft noise or reduced air quality.

In terms of environmental issues, any proposal for expansion beyond the agreed limits would have to be judged with this particular Core Strategy policy in mind.

Because of improvements in technology, although aircraft themselves tend to be quieter, noise from overflying aircraft has an impact right across the southern part of the District. There is little likelihood of significant noise improvements for residents affected by aircraft taking off or landing for the foreseeable future. Noise caused by overflying aircraft remains a serious issue and such noise and the frequency of aircraft flying overhead should be the subject of a dedicated study. This study based on evidence should include research, evaluation and assessment of the issues of noise caused by the frequency of overflying aircraft.

There has been no assessment of road traffic noise and the environmental impact from increased surface access traffic on noise needs to be fully considered. This impact is not only from passengers accessing the airport but also from the increased number of staff that will be employed directly or indirectly as a result of a second runway. The potential location of the additional staff in areas not immediately adjacent to the airport would lead to higher levels of in-commuting which will have its own associated environmental impact.

There is significant concern about the environmental impacts resulting from a second runway as much of this would be felt in southern parts of Tandridge District because of their location to the east of Gatwick Airport. The Council is concerned about the impact of the flight paths that would be introduced in the event of a new runway, particularly as this could result in an additional 260,000 flights by 2050. It is considered that there should be sufficient evidence based information on the impacts resulting from noise, in particular, those related to over flying. Such detailed information about the resulting impacts needs to be provided for a full and proper evaluation of the proposed second runway.

The assessment of air quality undertaken by the Airports Commission is quite limited and involves emissions forecasting rather than dispersion modelling. Dispersion modelling enables the impact on areas more local to the airport to be identified. The lack of dispersion modelling makes it impossible for external stakeholders to assess compliance with EU limit values, to examine the changes in temporal and spatial pollution concentrations compared to the base case, and to examine the source of pollution, that is, aircraft versus road traffic and how these change with time. Gatwick Airport Limited has undertaken its own dispersion modelling, however, this work has not been independently assessed by the Airports Commission. The Airports Commission acknowledges the need to undertake dispersion modelling and refers to

it being undertaken at a later date, although no timetable is given for this work. Based on the existing assessment, the Airports Commission considers the impact on air quality of a second runway at Gatwick to be adverse, although with further mitigation it is considered that there is the potential for this effect to be neutral.

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

Council's Comments

No comments

Q8: Do you have any other comments?

Council's Comments

Local Economy Impacts

Employment

A potential impact is that caused by waiting for an outcome that provides any certainty whether there will be a second runway at Gatwick Airport or not. Whilst uncertainty remains, businesses may make a decision not to invest in particular sites which may be affected by the second runway proposal and could, therefore, seek to locate in areas outside the wider Gatwick Diamond area.

Housing & Social Infrastructure

It will be worth bearing in mind any possible impact an expanded airport might have on the District and its housing supply. It should be noted that approximately 94% of Tandridge District is Green Belt and the southern part of the District is almost entirely Green Belt and rural. The Council would be concerned about pressures on this area for new housing particularly in view of Gatwick Airport Limited in its submission to the Airports Commission having raised the number of local jobs created from 17,500 to 22,000 and the number for local housing from 7,000 additional homes to 9,300.

In the forthcoming review of its Local Plan there is likely to be considerable pressure on Tandridge District Council for a significant increase in the number of houses needing to be built in the Green Belt. As a result of in-migration from London resulting from the First Alteration to the London Plan, there is also likely to be further pressure for a significant increase in housing on Green Belt land in the District. The accommodation of additional housing resulting from in-migration will be challenging, given the environmental and policy constraints that apply to the District. This will be made even more difficult if there is added pressure resulting from the expansion of Gatwick Airport.

Capacity Issues

As regards runway capacity at Gatwick Airport, in the last financial year 35.8 million passengers per annum used Gatwick Airport's single runway. The capacity of

Gatwick Airport as “a single runway/two terminal airport” is, according to the Gatwick Master Plan of July 2012 forecast for 2021/22, 40.2 million passengers per annum with the potential to grow up to around 45 million passengers per annum by 2030 on the single runway. The Gatwick Airport Second Runway – Employment and Housing Technical Report of March 2014, which was produced by Optimal Economics, assumes that by 2050, Gatwick Airport could handle up to 50 million passengers per annum with no second runway on the basis of factors such as increased aircraft size and continued improvements in technology. As can be seen in capacity terms 35.8 million is short of 40.2 and well short of both 45 million and 50 million.

In Gatwick Airport Limited’s details of its case for a second runway submitted to the Airports Commission, the passenger numbers per annum have been revised from 87 million to 95 million by 2050, which will lead to the impacts of expansion at Gatwick Airport being even further exacerbated bearing in mind the existing inadequate infrastructure issue which is not being properly addressed.

Tandridge District Council
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