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14 December 2018

Dear Sir / Madam,

Gatwick Airport Draft Master Plan 2018 Consultation

I am writing on behalf of Mole Valley District Council (MVDC) to respond to Gatwick Airport Limited (GAL)'s consultation on the Draft Master Plan 2018.

Mole Valley District lies immediately to the north of Gatwick Airport. As a Council we recognise the economic benefits that the growth of Gatwick Airport can bring. However, that same growth will also bring further noise and air pollution, as well as transport congestion. While the economic benefits of any growth would be relatively widely felt, the adverse effects would be concentrated in a much smaller area on the communities surrounding the airport. We have carefully considered the contents of the Draft Master Plan and wish to make the following representations, without prejudice to any future Development Consent Order application.

Growth Scenario 1 – use of the main runway

MVDC supports the growth of Gatwick Airport within its existing footprint as a one runway, two terminal configuration. The economic benefit to the wider area outlined in the Draft Master Plan compared with the relatively contained additional environmental impact strikes a reasonable balance between GAL's ambition to grow and the need to respect the living conditions of communities that surround the airport.

MVDC welcomes the utilisation of new technologies to allow the airport to grow whilst also encouraging newer, less noisy aircraft. Whilst the overall noise footprint may shrink the frequency of noise events in nearby villages will grow with the increase in air traffic movements and this itself has consequences for the health of the local population. We consider further technical evidence on the matters of noise and air quality for this scenario, particularly in the form of metrics that measure the frequency of noise events.

MVDC welcomes the provision of additional infrastructure to enable this growth within the airport's existing footprint and will support the airport in seeking to improve road and rail capacity to the area. Careful planning will be needed to ensure that existing surface access issues are not exacerbated, to the disbenefit of both airport users and local residents.

Growth Scenario 2 – use of the emergency (standby) runway

MVDC is concerned at the potential impact the use of the existing emergency runway for departures could have in combination with the main runway. We are equally concerned that this scenario is included in the Master Plan without adequate technical evidence to quantify what the impact would be.

MVDC understands that Government policy as outlined in *'The future of UK aviation: making the best use of existing runways'*, encourages GAL to explore the possibility of better utilising their existing assets to enable growth. However, this is on the understanding that economic and environmental considerations have been sufficiently considered. We are concerned that the impact of additional noise, air quality and surface access brought about by the proposed use of the emergency runway could be significantly harmful, but that the lack of proper assessment denies respondents to the consultation from commenting meaningfully on this scenario at this stage.

The emergency runway is approximately 200m to the north of the main runway and therefore utilising it for departures would effectively shift noise disturbance 200m to the north. This relatively small change in the noise environment would have a disproportionately large impact on those communities lying in close proximity to the north of the runway and approach path, such as Charlwood and also villages further to the west under Departure Route 4.

GAL's claim that noise generated by this scheme would be broadly similar to today's level is simply wrong. An increase of over 100,000 air traffic movements (equivalent to approximately 39% increase on current movements) would be a major change in the frequency of noise events to local communities that are overflowed. The periods of respite from aircraft noise would also become shorter. MVDC therefore requests that GAL follows DfT guidelines and models noise in more comprehensive ways than just by using dBALeq contours; Nx contours will give a far better indication as to the true change in noise disturbance by showing the frequency of noise events on communities surrounding the airport. Until GAL undertakes this work, we are not in a position to arrive at a more definitive conclusion as there is not enough technical evidence to be able to say just how adverse an impact the increase in aircraft movements will have on local communities and the wider area.

MVDC also has concerns about the ground noise implications of the potential reconfiguration of the airfield to accommodate any use of the emergency runway. Relocation of the existing Juliet taxiway and the creation of a resequencing and holding area at its western end may cause significant ground noise disturbance; the impact upon local communities such as Charlwood must therefore be properly considered and mitigated. We would request that GAL fully explore the wider noise implications of this growth scenario and any attendant airfield reconfiguration.

The attendant air quality and pollution issues from such an increase in ATMs would also be harmful to communities and the environment surrounding Gatwick. MVDC requests more technical evidence on these matters before being able to come to a decisive conclusion on this growth scenario.

MVDC is also concerned at the lack of evidence to show how additional demand on surface access capacity would be met. Even with the additional capacity resulting from the smart motorway scheme currently being constructed on the M23, and the planned increase in capacity on the Brighton mainline, the demand arising from use of the emergency runway would place yet additional pressure on this infrastructure. The vulnerability of surface access to Gatwick

Airport is well documented, with the local road network unable to cope with any disruption in mainline or motorway capacity.

MVDC is concerned that Gatwick Airport is handling an increasing volume of cargo without an efficient mechanism of processing it. We would welcome clarification as to how the increased amount of cargo mentioned in the Draft Master Plan would be handled, as currently it has been suggested that all cargo is taken to Heathrow Airport by road to be sorted; a hugely inefficient process. A sorting facility at Gatwick would reduce strain on the already overburdened strategic road network, whilst reducing carbon emission of transporting the cargo elsewhere for sorting.

MVDC are aware that Gatwick Airport is a significant contributor to the local economy and is a large employer in the wider area. We are supportive of the economic benefit to the region through the growth of the airport, however remain concerned that this does not outweigh the negative impact on the environment and local communities. We look forward to further technical evidence to better inform our position on the matter.

In the event that the second growth scenario is pursued, the airport must strive to mitigate the significant adverse effects on local communities. We would welcome discussions with GAL regarding this matter in due course.

Growth Scenario 3 – safeguarding land for a fully operational additional runway

MVDC opposes the continued safeguarding of land for an additional runway at Gatwick Airport. The Government's Airports National Policy Statement was clear that additional runway capacity in the South East was best achieved in the form of a third runway at Heathrow Airport, and therefore there is no need to continue to safeguard the land in Crawley which, as identified by Crawley Borough Council, could be better utilised for other more pressing needs such as employment and housing.

The land should not be further safeguarded and GAL should instead provide local residents with the reassurance that an additional fully operational runway will not be pursued, after years of uncertainty.

MVDC has consistently objected to an additional fully operational runway at Gatwick Airport, and remains of the view that the severe impact on nearby residents and communities would be wholly unacceptable. The significant increase in noise and pollution to those who live and work around the airport and the subsequent impact on the environment and quality of life for residents in Mole Valley, as well as the substantial impact on the road and rail network is resisted in the strongest possible terms.

Other considerations

MVDC would strongly oppose the operation of two fully operational runways alongside the use of the emergency runway for departures. GAL must therefore confirm that should a fully operational second runway ever be built, any potential use of the emergency runway for departures would cease entirely.

MVDC is disappointed that GAL has only chosen to host six consultation events during the Draft Master Plan consultation, and initially had not intended to hold one at all in Surrey. While it is welcomed that they acted quickly to rectify this error, it is still disappointing that GAL refuse to hold events in each borough or district, and more so each village, potentially affected by these proposals. GAL would do well to reach out to communities such as Charlwood in similar

consultations where feedback will not be as positive as from larger places such as Brighton and Croydon that benefit economically from the growth of the airport without the adverse effects of noise, air quality and surface access issues.

MVDC welcomes GAL's continual commitment to operate the airport in a sustainable manner. We support the Decade of Change Sustainability Strategy and would encourage GAL to continue to strive for efficiency improvements to reduce Gatwick's environmental footprint.

I trust that you will take these views into account when progressing the Master Plan and we would be happy to clarify any issues raised. All comments above are without prejudice to any future Development Consent Order application process.

Yours faithfully,

A handwritten signature in black ink, appearing to be 'C. Yarwood', written in a cursive style.

Councillor Charles Yarwood
Deputy Leader and Cabinet Member for Strategy and Assets