

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

Mid Sussex District Council: Detailed Comments

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

Answer

- 1.1 The Commission has produced a wide-ranging and detailed appraisal of the options. All the main issues have been covered although there is 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 Council's response suggests areas where the Commission's work could be improved so that its recommendations to Government are based on sounder and more robust evidence.
- 1.2 However, the response from this Council goes further. Whilst the Council is strongly pro-business and supportive of sustainable growth in the local economy, it expresses grave concerns about the impact on this area of a second runway at Gatwick. In particular,
- The damage that would be caused by the urbanisation of the high quality and essentially rural character of Mid Sussex. This damage would be caused by the increased development pressure arising from the airport expansion and related development;
 - The damage caused by increased noise from aircraft and related traffic to the quality of life of residents and the rural economy of Mid Sussex;
 - The very limited economic benefits to Mid Sussex, given its very low level of unemployment and the low skilled nature of the additional jobs that would be provided by the airport expansion;
 - The difficulty for the wider area in meeting its existing housing needs (it already under-provides against its needs by 2,000 homes per annum);
 - The reality of the increased housing pressure on Mid Sussex that would be caused by the airport expansion, particularly considering that nearly half of Gatwick's existing workforce lives in Crawley, Mid Sussex, or Horsham. This could equate to an increase of 51% in the amount of housing Mid Sussex would need to accommodate, which would be untenable;
 - The failing infrastructure of the area already, with an identified infrastructure funding gap in Mid Sussex alone of £119 million for existing planned levels of development. If other authorities have similar infrastructure costs, 18,400 homes will require infrastructure investment of £184 million on top of existing requirements. This would require substantial investment by Government, making Gatwick a more expensive option for the taxpayer than currently suggested and the infrastructure itself will also add to the urbanisation effect.
- 1.3 It is important that these over-arching objections to the proposed development are not lost in the detail of our response. The Commission should be under no illusions about the devastating impact a huge airport at Gatwick could have on this beautiful, ecologically and historically rich area of the Country. The Commission has underestimated the nature of this impact and its consequent implications on the capacity of the area to absorb the urbanising implications of an expanded airport.

- 1.4 Despite its rural nature, Mid Sussex enjoys a buoyant local economy and has sensible plans for sustainable growth both of housing and employment space. The Council is therefore disappointed that the economic impacts of an expanded Gatwick are not more positive for the District, indeed the evidence to date suggests that the impact of an extended airport at Gatwick would jeopardise sustainable economic growth in this area, putting an unacceptable strain on local infrastructure and services.

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 proposal by Gatwick Airport Limited to commit to funding 2,500 new apprenticeships is welcome, but further details of this scheme will be needed to ensure that it benefits residents of Mid Sussex, particularly young people entering the job market.

Social Infrastructure

- 2.2 Mid Sussex already experiences a significant infrastructure deficit. For current planned levels of growth up to 2031, the infrastructure needs are estimated to cost £138 million, of which only £19 million is currently committed or can be reasonably anticipated under s106 developer contributions. Assuming that infrastructure costs in the other authorities affected are similar to those in Mid Sussex, then an additional 18,400 homes brings with it an infrastructure bill of at least £184 million towards transport, education, health and other community infrastructure. The Commission must recognise the need for and cost of additional infrastructure to support additional housing generated by the expanded airport as this will affect the deliverability and cost of the scheme. Gatwick has pledged £46.5 million towards community infrastructure and £10 million towards local road improvements. However, this will not be sufficient to address strategic needs in the area, and the Commission will need to recognise and build into its evaluation, the substantial Government investment that will be needed to supplement developer funding should expansion occur at Gatwick.
- 2.3 The Council is also concerned that the increased infrastructure itself will add to the development pressures in the area and adversely impact on its rural character. New schools and health facilities have a land take and often have to be located on green field sites. Improvements to roads and junctions to increase capacity can significantly change their character and lead to a general urbanisation of the area and loss of the distinctive character of rural Sussex lanes which is highly valued by Mid Sussex residents.
- 2.4 The Commission is therefore asked to review the level of commitment needed to infrastructure, to include recognition of:
- the existing infrastructure deficit which must be addressed before further development pressures can be placed on this area;
 - the additional costs of providing additional infrastructure to meet this deficit and the needs of the expanded airport, and the need for substantial Government investment as well as that pledged by Gatwick Airport Ltd;

- the need to put appropriate mechanisms in place to secure the funding and provision of this infrastructure; and
- the impact of the increased infrastructure itself on the rural character of the area.

Surface Access

- 2.5 The rail network in this part of the South East is already experiencing considerable congestion and overcrowding and it is of grave concern to the Council that part of the increased rail capacity already planned 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 continuing, unacceptable levels of congestion. The Commission has already noted that the Brighton Main Line may need further upgrades in the 2040's. It seems likely that improvements will become increasingly difficult, and expensive to deliver and may involve radical solutions, including alternative routes from the South Coast to London.
- 2.6 The Commission is therefore asked:
- 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. It therefore needs to incorporate into the assessment further improvements which would be needed, partly as a result of a new runway at Gatwick and associated development. This should be taken into account by the Commission and the costs and deliverability fully assessed.
- 2.7 Significant reliance is placed on the North-South corridor which contains the M23/A23 and the Brighton Main Line. There is currently only limited access from that corridor to the Airport and the alternative routes are also limited. The Commission should give more consideration to the impacts on other major links in the area and the need for their improvement, including the A264 and the A22, both of which are likely to experience further pressures, in their own right and as alternatives to the M23/A23 at times when this route is congested. The Commission should also review its assessment of the scale of freight which might pass through Gatwick, and the consequential implications for employment and transport, taking into account the potential changes in the character of the airport over a long period.
- 2.8 In its proposals, GAL has set out targets for securing high levels of public transport usage; these will need to be robustly challenged to establish whether they are reasonable, given the current dependency on car travel, and mechanisms put in place to ensure that they are delivered. In this and other assessments the Commission should take into account the implications of shift working patterns at the airport.
- 2.9 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. Local roads to the south and east of the airport already experience heavy volumes of traffic, particularly at peak times. This is likely to be exacerbated with the increased demand for access to the airport. The Commission should extend its analysis to consider in more detail the effects of a new runway and associated development on the local road network and measures which should be put in place to mitigate the impacts. Further discussions are needed to establish an appropriate size for any fund, who should contribute to it and

how it should be distributed. It should include specific provision for addressing problems on local roads as well as at strategic junctions.

2.10 The Commission is therefore asked:

- To include within its assessment the impact of a new runway and associated development pressures on local roads and to seek to ensure an enhanced package to address those impacts;
- To ensure that the full costs of Gatwick are understood when the Commission makes its comparisons between Gatwick and Heathrow;
- To establish robust mechanisms which ensure that infrastructure and other commitments needed to address or mitigate the impacts of any new runway and the associated development can and will be delivered. Such mechanisms should include full involvement of local authorities and other infrastructure providers. The Commission should be satisfied on the deliverability of these mechanisms when it makes its evaluation of the Gatwick option.

Noise

2.11 Noise from night flights is recognised by the Commission as an issue. GAL has suggested that the northern runway could be used for night flights. 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. Gatwick Airport Ltd is proposing to extend the 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 experience 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, should be extended to houses within the 54db contour with the level of contribution stepped to reflect the differing levels of disturbance.

2.13 No mitigation of noise effects for schools has been included in the report but Gatwick Airport Ltd's proposal is that schools are not overflown during the school day.

2.14 The Commission is therefore asked:

- In the event that it recommends a second runway at Gatwick, to incorporate noise mitigation measures and mechanisms for ensuring their delivery, Including:
 - An effective regime for limiting, managing or preventing night flights.
 - Review the indicative flight path to minimise flying over built up areas.
 - An increase in the pledges from GAL to include noise insulation and Council tax rebates for properties lying within the 54db contours
 - An effective regime for limiting and managing flights flying over schools and community buildings.

The Council has commissioned a detailed technical report on the noise impact of a second runway at Gatwick, and this report is appended to this consultation response as a background supporting document.

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

Answer:

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

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 asked to refer to the comments contained throughout 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:

Local Economy

5.1 This Council is positive about economic growth and welcomes opportunities to support the Mid Sussex economy in line with the Council's Economic Strategy, which includes supporting knowledge based business and utilising a highly skilled workforce to support such high value sectors.

5.2 The Council notes that the increased jobs for an expanded Gatwick airport are anticipated to remain relatively low-skilled. The Commission needs to appreciate that surrounding authorities, such as Mid Sussex, have very low levels of unemployment (currently only 0.6% or 332 people in Mid Sussex are on Job Seekers Allowance). In addition the skills profile of Mid Sussex is high. Over 67% of the working age population is qualified to 'A' level or above and less than 4% have no qualifications.

5.3 The Council's Economic Development Strategy seeks to provide additional jobs to enable residents to work within their communities and reduce the need to commute. To achieve this it is important to match new jobs with the skills and capacity of the existing workforce. This means encouraging knowledge-driven, creative and high technology businesses which deliver high value, skilled jobs.

5.4 Due to the relatively low-skilled nature of the new jobs the Commission envisages being created by an expanded airport, it is possible that those needed to fill these jobs would have to migrate into the area from elsewhere. Whereas the provision of high skilled jobs could reduce existing out-commuting, if residents that currently commute out of the area take up jobs at the airport, this is unlikely to happen with lower skilled and lower paid jobs. This has implications in terms of housing numbers. The in-migration of lower-skilled workers also has implications for the provision of affordable /

subsidised housing and the cost of the support needed for lower paid residents (such as benefits, Council tax support and health provision).

- 5.5 The Council notes the Commission's employment forecasts (and their consequent housing forecasts) are significantly lower than those used for Heathrow, because they assume that Gatwick will continue to have a focus on point to point and low-cost sectors. However, if the development of Gatwick as a two runway airport results in an increase in the amount of long haul travel, then this could result in higher levels of employment and housing than suggested by the Commission. The Council, whilst keen to foster sustainable economic growth, has concerns about the negative impact such growth could have on the character of the area, as set out elsewhere in this response.
- 5.6 The Council is very concerned about the Commission's assumption that provision of premises to meet new employment needs would not be an issue within the wider area. The Commission has not appreciated the severe environmental and infrastructure constraints of the area in accommodating additional development (expanded on elsewhere in this response). The Council is positive about the provision of employment space in line with its Economic Strategy but considers the Commission has over-estimated the capacity of the area to accommodate employment space over and above that needed within current plans.
- 5.7 The Commission is therefore asked to note that, due to the relatively low skilled nature of the additional jobs to be created, the expanded airport may have limited economic benefits to Mid Sussex. This is because this Council considers it crucial to the sustainable growth of the local economy, that there is an increase in knowledge based, high value employment which builds on the skilled nature of the existing workforce. Growth in lower-skilled jobs, as envisaged by the Commission, therefore does not fit well with the ambitions Mid Sussex has for its economy. In addition, some existing local businesses have also expressed concern that the already limited labour market would be further reduced by the airport expansion and local firms would find it more difficult to recruit and retain staff.
- 5.8 Despite previous requests from local authorities the Council is disappointed to note that the Commission has not considered the effects of a new runway at Heathrow on Gatwick and the area around it. This analysis should be carried out in order to understand, in particular, how the local economy might be affected.

Local Economy (Housing and Social Infrastructure)

- 5.9 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 area and the Commission needs to appreciate the severe environmental and infrastructure constraints of the area. This means it is already very challenging to plan in a sustainable way to meet existing projected needs.
- 5.10 Mid Sussex is a predominantly rural authority with a high level of environmental constraint. A recent study demonstrates that 92% of Mid Sussex is constrained and, of the remaining 8%, 4% is already built upon. The area surrounding Gatwick Airport is predominantly rural in nature and many areas comprise landscapes of the highest quality. 60% of Mid Sussex is either within the South Downs National Park or the High Weald Area of Outstanding Natural Beauty. 24% of the District is woodland and 16% ancient woodland (32% of which is not in the National Park or AONB).

- 5.11 In addition the European designated Ashdown Forest Special Protection Area and Special Area of Conservation in neighbouring Wealden District, means that 29% of Mid Sussex is within the buffer zone for the Forest. Our District has 13 Sites of Special Scientific Interest (SSSI) and over a thousand listed buildings and 25 scheduled monuments.
- 5.12 Mid Sussex has a rich network of ecological and historic assets. The area is rural in nature, tranquil and those living within it enjoy a high quality of life (17th out of 405 authority areas in the Halifax Quality of Life survey 2014). Therefore it is extremely important that the Commission takes into careful account the impact of developing a huge airport, bigger than the existing Heathrow, in the middle of the Sussex and Surrey countryside.
- 5.13 This Council believes the impact would be to change the nature of this historic and beautiful area irreparably. Indeed it could be argued it will change the environment from rural to urban necessitating high density development which is out of character with the market towns and villages of Mid Sussex.
- 5.14 In the wider area, neighbouring authorities are also heavily constrained, including by metropolitan Green Belt. As a result the wider area is currently projected to under-provide by 2,000 homes per annum compared to its existing predicted needs. This makes it highly unlikely that the area would be able to deliver the additional housing generated by an expanded Gatwick Airport.
- 5.15 The Commission's assumption that the housing pressure would be shared equally amongst the 14 authorities is completely unrealistic. At present nearly half of the airport's workforce resides in Crawley, Mid Sussex and Horsham, known collectively as the Northern West Sussex Housing Market Area. Due to the physical constraints of Crawley (which is built up to its administrative boundary) and the environmental and infrastructure constraints of Horsham and Mid Sussex, this Housing Market Area is currently unable to meet its existing predicted housing needs, and would not be able to meet the needs of the expanded airport without severe environmental damage and over-burdening the already failing infrastructure.
- 5.16 Additionally there is already an affordability issue in the area, with average house prices exceeding average salaries by a factor of 10. If the additional homes generated by the airport expansion are predominantly for low-skilled workers they are unlikely to be able to afford open-market homes to rent or buy, placing further pressures on the delivery of social housing. The provision of social housing is severely restricted due to reductions in Government grant and policies which reduce the ability of local authorities to require developers to provide a proportion of new homes for this sector. The amount provided is already insufficient to meet needs and an expanded airport will make the situation worse.
- 5.17 Issues relating to social infrastructure are dealt with in paragraphs 2.2 to 2.4 to which reference should be made with reference to this question.

Surface Access

- 5.18 Issues relating to Surface Access are dealt with in paragraphs 2.5 to 2.10 to which reference should be made with respect to this question.

Noise

- 5.19 The effects of noise on parts of Mid Sussex are a major concern to this Council. Maps produced by the Commission show how, without a second runway, noise contours contract as aircraft generally become quieter. With a second runway, 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. If there is an increase in long haul flights, the noise associated with larger, heavier aircraft carrying freight should be tested.
- 5.20 Copthorne and areas close to it would be directly affected by this and it is a major concern to this Council. As an example, the 57 dBLAeq 16 hour contour, the level used by the Government as marking the approximate onset of significant community annoyance from aircraft noise, currently runs along the line of Antlands Lane and on to the south of Newchapel. With a second runway, the Commission's forecasts show the contour line moved south to run approximately along the line of the A264, bringing the village of Copthorne, including a number of local schools/nurseries, into the noise affected area. The wider 54 dBLAeq 16 hour contour and other contour maps produced by the Commission demonstrate the way in which this area would be affected by both landing and take-off, with aircraft which depart in an easterly direction turning south shortly after take-off and passing close to if not over Copthorne.
- 5.21 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. In Mid Sussex, the issue is likely to be particularly significant in areas to the south east of the airport where new take-off routes are indicated, affecting local villages and schools, such as at Copthorne, Crawley Down, Turners Hill, Balcombe and the town of East Grinstead. However it is also likely to be an issue further away when regular and frequent overflight disrupts the normal tranquillity of an area, an issue for local residents and for small businesses that have sought out these more tranquil locations in the South East.
- 5.22 The Commission is therefore asked:
- To note the Council's concern at the level of noise and disturbance that would be generated by a second runway and the adverse effects on our communities.
 - 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 are likely to be affected by overflying aircraft.

Other Environmental and People Issues

- 5.23 It is of concern that the Commission has not yet completed its work on air quality. This is an issue for the local area both in terms of air travel and surface access. The Commission should also consider further the implications of increased traffic on the Ashdown Forest Special Area of Conservation. 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.

5.24 The Commission is therefore asked:

- To ensure that its work on air quality is completed taking into account issues related to increased surface traffic as well as air traffic
- 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, including the impacts of air quality on the health of people in Mid Sussex
- To ensure that its air quality assessment takes account of the impact on the flora and fauna of Mid Sussex; and
- To assess the likely significant effects on the Ashdown Forest Special Area of Conservation and Special Protection Area as required under the Habitats Regulations, particularly relating to the effects of increased traffic.

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.