

## *Appendix A: Proposed Response by Kent County Council to the Gatwick Airport Consultation on the draft Master Plan 2018.*

**As part of the Gatwick Airport draft master plan, we are proposing to grow Gatwick by making best use of the existing runways in line with Government Policy. The benefits of growing Gatwick would include more choice of destinations for passengers, as well as additional employment opportunities and benefits to the wider economy. We are proposing to make Gatwick a more efficient airport, while at the same time reducing or mitigating our impact on the environment.**

**QUESTION 1 Given the above, to what extent, if at all, do you support or oppose the principle of growing Gatwick by making best use of the existing runways in line with Government policy? Before answering, you will find it useful to read Chapters 4 and 5 in the full version of the draft master plan.**

Strongly oppose.

**QUESTION 2 Please explain why you hold this view.**

The policy to more intensively use existing runways was borne out of the Department for Transport's (DfT) *Aviation Strategy Call for Evidence*. In the context of Gatwick, this includes increasing the capacity of the airport in its existing configuration and introducing the routine use of the emergency ('standby') runway.

However, this must be seen in the context of the forthcoming capacity expansion at Heathrow Airport following the Parliamentary vote in favour of implementing the Northwest Runway scheme on 26<sup>th</sup> June 2018. This transformative scheme will release significant capacity and guarantee a night flight ban at Heathrow. Rather than additionally expanding at Gatwick, the benefits of this additional capacity should be shared and used to enable night flight bans at the other London airports.

Similarly, Stansted Airport has recently been granted planning consent to expand handling capacity to 43m passengers annually compared with the current cap of 35m. Given the boost this scheme gives to the London Airports system as a whole, it really questions whether this proposed extra capacity through use of the emergency runway is needed at Gatwick. Especially considering the significant negative impacts this would have on the communities around the airport and the surface access routes (M23 and Brighton Main Line).

Maximising the throughput of the airport in its current configuration would take Gatwick from 45.7 million passengers per annum (mppa) (280,790 air transport movements (ATMs)) in 2017/18 to 52.8mppa (300,000 ATMs) in 2022/23. This could

be 61mppa by 2032. The draft Master Plan states that most of the growth will be outside of the peak periods. This means that there will be a higher number of flights per hour throughout the day, as well as spreading of the summer peak period. An increasing number of long-haul services will likely lead to more winter-time demand. Given Gatwick has spare capacity in the winter night quota period, we are concerned that some of the peak spreading might take place then to the detriment of communities who currently experience some respite overnight in the winter. We recognise that such growth is outside of the planning process and therefore mitigation and compensation for communities around the airport is voluntary.

Published night noise exposure contours have been shown to extend as far east as Chiddingstone (48dB contour, summer 2015), and KCC receives numerous complaints from residents in the districts of Tunbridge Wells, Tonbridge and Sevenoaks. The level of distress caused by night time noise is significant in west Kent, as it is in other areas affected by overflight. Between the weeks ending 31<sup>st</sup> March 2018 and 6<sup>th</sup> October 2018 (the summer period), there were 9,580 arrivals (including 947 dispensations due to adverse weather), which averages to more than 45 per night. If each of those noise events disturbs sleep or completely wakes a person, then it has a severe impact on their health and wellbeing.

It is imperative that Gatwick uses its existing channels of engagement with Local Authorities, community noise groups, the DfT and others, such as through the Noise Management Board, to really understand where concessions can be made that would make a meaningful difference to the lives of those under the flight paths to/from the airport.

There is continually emerging evidence on the impacts of aviation noise that strongly demonstrates the real health costs felt by individuals. Ultimately these costs are picked up by the National Health Service (NHS) and by the wider economy in reduced productivity. More intensive use of the existing runway will lead to more intensive noise impacts. Kent County Council (KCC) cannot support growth at all costs.

At Gatwick, bringing the emergency ('standby') runway into operation for departing aircraft will significantly increase the number of aircraft movements that the airport can handle. Whilst we understand that an increase in aircraft movements would enhance the economic benefits of the airport (through business travel, tourism, trade and increased employment both on site and in the supply chain), the use of the emergency runway is not something KCC supports.

The Council's Cabinet adopted the *Policy on Gatwick Airport* in December 2014. This policy explicitly states that KCC opposes a second runway at Gatwick. Whilst at the time, this was in the context of the Airports Commission and the proposals for a newly constructed and independently operated second runway, we consider these

latest proposals to routinely use the emergency runway would effectively become a second runway. This reality would imply that a future new runway proposal would be a third runway for Gatwick.

In our response to the DfT's *Call for Evidence*, we opposed the introduction of the policy to more intensively use existing runways. The concerns we expressed in that response can be summarised as:

- The policy is a default of support for expansion, placing this need above all others. KCC's view is that the voice of communities needs to be listened to regarding the damaging impact of aviation noise.
- Mitigation and compensation cannot counteract the inability of residents to sleep, the resulting reduction in educational attainment of children, or the wider negative health impacts of noise. It is simply not possible to insulate an open window or a garden. The increased overflight of designated landscapes will also disrupt the tranquillity from which many people benefit in areas such as National Parks and Areas of Outstanding Natural Beauty (AONB).
- Expansion will need new flight paths and therefore cause new communities to be impacted by aviation noise, as well as increased concentration/frequency of noise owing to the extra capacity released. Therefore, where communities are newly affected, there is a case for financial support for residents who wish to move from the area.
- More intensive utilisation of existing runways will be an attractive commercial decision based on growing demand and constrained runway capacity, particularly until the completion of a new runway at Heathrow. However, once the Heathrow Third Runway is operational, we would expect to see Government review the other designated airports to achieve environmental and social benefits (e.g. through a reduction in the night noise and movement quotas) to properly share the benefits of this expansion.

With respect to the Gatwick draft Master Plan, we are especially concerned about the impact of additional aviation noise on our communities in west Kent. The proposal is for the emergency runway to be used for departures only, which on average are towards the west. Nevertheless, this would release capacity on the main runway for arrivals and these predominantly affect the east of the airport. Noise forecasts produced show that in this scenario the noise environment around Gatwick would be broadly similar to today, i.e. the benefits of quieter aircraft would not be felt by the communities around the airport. This is not in keeping with the ethos of sustainable growth that is promoted in the draft Master Plan.

Furthermore, the additional passenger numbers that the emergency runway scheme could accommodate would take Gatwick from 45.7m (2017/18) to up to 70m by 2032/32 and up to an additional 109,210 air traffic movements. This is without

significant infrastructure improvements either on airport or off-site on the strategic surface access routes to the airport. From KCC's perspective, we are particularly concerned about the lack of resilience in the motorway and rail networks, with Gatwick reliant on the M23 and Brighton mainline – the same networks that handle millions of non-airport journeys. Both of these networks are approaching capacity, and recent improvements have been designed to cope with background growth rather than additional airport passengers. Improvement to parking on-site will not be sufficient mitigation for the forecast growth in passengers.

Under this scenario cargo tonnage is forecast to increase from 102,000 tonnes today to 325,000 tonnes by 2032. We understand the economic benefits of this increase, especially as we transition to new trading partnerships post-Brexit. However, the M23 is the main route for freight and these Heavy Goods Vehicles (HGVs) increase road maintenance costs, reduce motorway speed and utilise more road capacity than cars. Currently, cargo arriving at Gatwick is taken to Heathrow for distribution. This is clearly not a sustainable long-term operation and so capital investment at Gatwick needs to address this situation, as well as off-site improvements on the road and rail networks.

The planning framework for this scheme would be a Development Consent Order (DCO) application as the expansion enables a significant number of additional air traffic movements and is therefore classified as a Nationally Significant Infrastructure Project. Recent Government policy has called for more community involvement in setting noise limits at airports, and Gatwick's own Noise Management Board seeks to improve the noise environment for residents. Given that communities would see no improvement in their noise exposure if this scheme was implemented and also that runway capacity in the south east is being given a significant boost from the Heathrow Third Runway, we would expect Gatwick to offer concessions to truly share the benefits of any expansion. This would likely be best received by a reduction in night flights and best implemented through a Requirement imposed by any Development Consent Order granted, or a significant reduction in the noise and movement quotas set by the DfT.

Finally, it is not clear from the draft Master Plan if the passenger, aircraft movements and cargo figures for the emergency runway scenario account for continued growth in the existing configuration as per scenario 1. Given that the document states that these scenarios are not exclusive choices we consider that they have been assessed in isolation. If that is the case, then scenario 1 and scenario 2 enacted together (which is feasible in the national policy context) could see a dramatic increase in airport throughput and a substantial worsening of the noise environment around the airport (not to mention surface access and other environmental considerations). This would be unacceptable.

**QUESTION 3 Given the draft master plan looks out beyond 2030, to what extent, if at all, do you agree or disagree that land that has been safeguarded since 2006 should continue to be safeguarded for the future construction of an additional main runway? Before answering, you will find it useful to read Section 5.4 in the full version of the draft master plan.**

Disagree.

**QUESTION 4 Please explain why you hold this view.**

Whether or not the land remains to be safeguarded should be decided by central Government policy. The Airports National Policy Statement (NPS) has set the planning framework for Heathrow to build and operate a Third Runway and decided that another runway at Gatwick is not the right expansion plan for the UK. This would suggest that the land should not continue to be safeguarded, although expansion at Gatwick was not explicitly ruled out in future by the NPS. We ask that Gatwick and Crawley Borough Council seek clarification from the DfT on whether the land should continue to be safeguarded, and the appropriate boundary for that safeguarding if taken forward.

Nevertheless, KCC remains strongly opposed to any additional runways at Gatwick and would continue to campaign against such a scheme should the Heathrow Third Runway fail to meet the NPS requirements.

**QUESTION 5 What more, if anything, do you believe should be done to maximise the employment and economic benefits resulting from Gatwick's continued growth? Before answering, you will find it useful to read Section 5.6 and Chapter 7 in the full version of the draft master plan.**

It is undoubtedly true that Gatwick contributes significantly to the local and national economy as a key international gateway and because of the increasing cargo tonnage handled. Some of the employees at Gatwick live in Kent (approximately 5%), and our proximity to the airport increases the attractiveness of Kent as a place to live and do business. However, we also suffer from that proximity in terms of the intolerable noise impacts on west Kent.

We do not see such strong economic benefits from Gatwick as London and the Local Authorities bordering the airport (including those in the Gatwick Diamond area and Coast to Capital Local Economic Partnership). However, we welcome the attendance by Gatwick at local careers fairs in west Kent, and promotion of leisure and tourism opportunities in Kent to visitors arriving at the airport. We would like to see more of these activities in future, and engagement with the South East Local Enterprise Partnership (SELEP) would be one way to reach Kent universities that

might be able to benefit from links to a large organisation with substantial capital investment and a Science, Technology, Engineering and Mathematics (STEM) focus.

We also encourage Gatwick to work with Kent's inward investment agency *Locate in Kent* (<https://www.locateinkent.com>) to establish further ways to work together to promote the business opportunities afforded by Kent's location. Visit Kent is another organisation who can help promote tourism connections and build on the 7.4% of Gatwick passengers terminating their journey in Kent.

Transport connections are a vital way to spread economic benefits. Travellers from Kent are largely reliant on the car to get to Gatwick, and journey times can be unreliable on the M25 and presently on the M20 and M23 with smart motorway schemes under construction. Therefore, we would welcome Gatwick's support for a reinstatement of the direct rail service from Gatwick via Redhill and Edenbridge to Tonbridge (see response to question 10).

**QUESTION 6 What more, if anything, do you think should be done to minimise the noise impacts of Gatwick's continued growth? Before answering, you will find it useful to read Sections 4.5, 5.5, 6.4 and 6.5 in the full version of the draft master plan.**

With continued single runway operation, the noise environment around Gatwick is expected to improve, primarily from the introduction of new generation quieter aircraft. This sees the population within every contour fall in each modelled year. Whilst this is fully welcomed, it is not due to anything Gatwick is actively doing to share the benefits of growth with communities around the airport but rather to technological advancements. Further, the contours are the average noise levels over a given time period and it must not be forgotten that the frequency of noise events is another measure that illustrates disturbance. It would have been helpful to have some N<sub>60</sub> contours and comparisons of today and future scenarios to give a fuller picture of how residents are likely to be affected by growth. Further information is also needed on the impacts of the scenarios operated concurrently and we would expect to see much more detailed noise modelling in any DCO application.

The answer given to Question 2 further explains that we implore Gatwick to take the opportunities provided by growth there and in the wider London airports system to consider the impact on the local communities and reduce night flights to lessen the noise impact at night – the most unacceptable kind of noise. We would be especially keen to see a night flight ban comparable to Heathrow's Third Runway proposals to genuinely share the benefits of expansion with the local communities negatively affected by noise. This is imperative in all scenarios, but especially the operational emergency runway and additional runway scenarios where there would be a real step-change in the number of air traffic movements at the airport.

An additional runway would dramatically worsen the noise footprint of the airport and see many new communities (and tens of thousands of individuals) newly affected by aviation noise. KCC continues to vehemently oppose an additional runway at Gatwick. The draft Master Plan reiterates the Gatwick proposals to the Airports Commission and that the additional runway could see almost a doubling of peak hour movements, leading to completely unacceptable and intolerable levels of noise and disturbance.

In developing plans for growth, Gatwick should consult with the Noise Management Board and the Independent Commission on Civil Aviation Noise. This should take into account the latest research, including new World Health Organisation (WHO) guidance on the level of aviation noise where no health impacts are observed – at 45dB L<sub>DEN</sub> & 40dB L<sub>NIGHT</sub> (World Health Organisation, *Environmental Noise Guidelines for the European Region*, 2018). This has profound implications for Gatwick, and all other airports, and recommends that operational and infrastructure changes are made to reduce the noise impacts (and therefore improve the health outcomes) for communities affected.

We appreciate the sentiment in paragraph 6.4.26 that Gatwick wishes to be “best in class” in the approach to noise management, and we recognise that elements of Gatwick’s noise offer go beyond Government requirements. However, we would always encourage Gatwick to strive even further, particularly in insulation and compensation schemes. As so many residents experience distress from persistent aircraft noise, and as Gatwick plans to grow under every scenario, there is an opportunity to offer greater assistance with moving costs to a wider range of people.

**QUESTION 7 What more, if anything, do you think should be done to minimise the other environmental impacts of Gatwick’s continued growth? Before answering, you will find it useful to read Sections 4.5, 5.5 and Chapter 6 in the full version of the draft master plan.**

Under every growth scenario Gatwick’s greenhouse gas emissions increase. This is something that the Government needs to consider in terms of the overall carbon budget and the UK’s commitments on climate change as part of the planning process for any expansion scheme at the airport. It is currently difficult to ascertain the air quality impacts of the airport owing to the recent change in methodology used to model this. Without further access to the air quality data used to forecast future impacts it is impossible to make meaningful assessment. However, Gatwick Airport should be held to account on its air quality impacts and strive to reduce them, both from aircraft and airside activities and in surface access.

In general, we would encourage Gatwick to look at the latest technological innovations as assets are maintained and replaced and new infrastructure is

introduced. This includes reviewing the choice of materials to use those with a smaller environmental footprint and looking at whole life environmental costs. The recent installation of the biomass boiler is an excellent example of innovation producing environmental benefits to the airport.

Continued dialogue with statutory bodies, such as the Environment Agency and Local Authorities, will also help Gatwick plan to reduce its environmental impact, which should happen regardless of growth in number of passengers or air traffic movements.

**QUESTION 8 Do you believe our approach to community engagement, as described in the draft master plan, should be improved, and if so, how? Before answering, you will find it useful to read Chapter 8 in the full version of the draft master plan.**

Chapter 8 sets out the range of engagement activities and events undertaken by Gatwick Airport. KCC participates in the Gatwick Airport Consultative Committee (GATCOM), the Noise Management Board (NMB) and the Noise and Track Monitoring Action Group (NaTMAG), as well as providing officer attendance at the annual Transport Forum, the NMB public meeting, and Local Authority officer groups. Our primary concern is the noise impact of the airport on Kent.

We welcome and acknowledge the positive input that Gatwick employees at all levels provide to these fora, as well as a commitment to make improvements that could lessen the noise footprint of the airport. Further, Gatwick has clearly made significant financial commitment to running these groups and to implementing the resulting actions. However, we also acknowledge the intense difficulty in reconciling Gatwick's aims for growth and the desire of communities to see the negative impacts of Gatwick's operations reduced (or at least not get any more intensive) compared with today. The NMB, with its independent Chair, goes some way to improving dialogue between the two sides. It has also provided technical advice and educational sessions on the complexity of airspace design to the Board members, which we consider to be invaluable.

To improve trust between Gatwick and the communities who are negatively affected by the noise from the airport, Gatwick needs to make meaningful change to reduce its impact. This draft Master Plan, with its proposals to increase air traffic movements and operate the emergency runway, risk undermining trust built through the NMB. Gatwick must give real consideration to the consultation responses received and make changes to the Master Plan proposals as a result.

**QUESTION 9 If you make use of Gatwick, what areas of the passenger experience would you like to see improved?**

This is outside the remit of our response.

**QUESTION 10 Are there any aspects of our Surface Access Strategy that you believe should be improved and, if so, what are they? Before answering, you will find it useful to read Section 4.4 in the full version of the draft master plan.**

Access to Gatwick Airport is reliant on the M23 and the Brighton Main Line, and so it inherently lacks resilience. Whilst these are high quality and frequent routes that are currently being improved, they also receive a high amount of demand from non-airport traffic and travellers. The scale of additional demand from growth at Gatwick is likely to absorb the capacity released by the current smart motorway scheme. Passengers travelling by car are also likely to have used the M25 and there is little, if any, spare capacity on this part of the strategic road network at peak times. This can lead to unreliable journey times. Similarly, on the rail network, the issues seen with Southern and Gatwick Express services as well as weekend blockades for maintenance works by Network Rail shows how susceptible the airport is to disruption. The DfT have recently rejected the proposal from a private company to link Ashford in Kent (and the Channel Tunnel) to Gatwick and beyond to Heathrow and HS2. This highlights the lack of viable proposals to improve rail connectivity to Gatwick, and without such additional capacity rail connections into Gatwick will remain limited to a single main line.

We welcome the targets for greater sustainable transport mode share for both passengers and staff. Sustainable surface access, particularly by rail, is the most efficient way to move high numbers of passengers, as well as reduce road traffic emissions. We support the proposal to extend rail connections via Reading and ask Gatwick to support any proposal for the reinstatement of the direct service to the east via Redhill and Edenbridge to Tonbridge. We consider that the emerging Sub-national Transport Body, Transport for the South East (TfSE), would be the ideal public body to promote the restoration of this essential rail link, and possibly to link it with the existing service between Gatwick and Reading. This would help to widen the economic benefits of the airport to Kent. Several attempts have also been made to pump prime a coach service from Kent. However, we believe that such a service could be successful if more closely matched to demand and better advertised. KCC would be happy to discuss such a service with Gatwick Airport.

Paragraph 4.4.8 states that Gatwick recognises “that we can only influence certain aspects of our surface transport links...” and whilst this is somewhat true, the Airport could opt to propose and fund network improvements off-airport.

**QUESTION 11 Do you have any other comments to make about the Gatwick Airport draft master plan?**

We trust that all consultation comments will be reviewed and amendments made to the final Master Plan to reflect those views.

When further consultation is carried out in advance of any DCO application, we wish to see much more detailed information on the likely environmental impacts of the airport's growth. This must include N<sub>60</sub> contours for noise and a full assessment of the emergency runway scenario in combination with the continued intensification of the airport in its current configuration. The information provided in the draft Master Plan is insufficient to properly assess impacts at this stage, although we note that Gatwick has not completed its own plans and assessment of this scheme yet.