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Your Ref:

Our Ref: Gatwick Airport Draft Masterplan

Date: 21st December 2018

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By e-mail only

Dear Sir/Madam,

Gatwick Draft Masterplan 2018

Introduction

Mid Sussex District Council (MSDC) has a number of initial comments on the draft Gatwick Masterplan. In doing so it notes that the current Gatwick Masterplan was approved in 2012, and since that time there has been significant growth of the airport and publication of the draft National Policy Statement.

The Masterplan sets out the current passenger numbers and aircraft movements, and offers three growth proposals. However, as the document generally lacks detailed consideration of the effects of these on the environment, it is difficult to identify the overall effects or relative merits of any the proposals on communities, the environment or economy. This is because no evidence base has been published to support the proposals.

Until this detail is available, the Council can only provide a high level response which identifies potential areas of concern. MSDC would wish to reserve the right to provide a more detailed response when the detailed evidence is available.

Sustainable Growth at Gatwick Airport

MSDC understands the role that Gatwick currently plays in UK aviation, and its significance as part of national infrastructure and the London airports system. The Council also appreciates the airport's role as a major employer in the Gatwick Diamond region, and its contribution to inward investment in the area.

MSDC agrees that growth in aircraft movements and passenger numbers is likely to result in economic investment and new jobs not only at the airport but also in the wider sub region. However, the Council is concerned that the impacts of planned growth on the wider area are fully managed to ensure that growth remains sustainable and beneficial to the area. The Council considers that it is likely that the achievement of sustainable growth in the airport will require significant local engagement with the Council and an appropriate package of local mitigations.

The Council is already addressing a significant growth agenda in the District that reflects the adoption earlier in the year of the District Plan. This includes a significant number of major housing developments. Engaging with these proposals will clearly place further demands on its resources and the Council would welcome an early discussion on how this engagement can be appropriately managed and resourced.

Executive Summary

The Masterplan proposes three options for growth. The document provides a high level overview of the options, and of the likely impacts of those options, and therefore at this stage it is not possible for MSDC to comment on the detail of the proposals. As such it reserves its position. Notwithstanding this overall position, the key issues set out in this response are:

- MSDC acknowledges the important economic role that Gatwick Airport plays in the local, regional and national economy;

- MSDC seeks confirmation of the implications of the Government's airspace management strategy on any of the options set out in the Masterplan, particularly on the spatial distribution of flight paths, and the frequency of flights arriving and taking off from Gatwick;

- MSDC questions whether the planned improvements, and improvements currently being delivered to the highway network and the rail infrastructure will be sufficient to accommodate the growth planned under Option 1 or Option 2, and encourages GAL to work closely with the local planning authorities and highway authorities to analyse existing infrastructure capacity and to plan for the infrastructure required to mitigate the impacts of planned growth;

- The Masterplan does not go far enough in identifying opportunities to make a real change to the way passengers and staff access the airport, and to encourage a modal shift to rail, buses, cycling and walking. MSDC encourages GAL to use the DCO process and to work with MSDC and with our neighbouring local and highway authorities to revise its surface access strategy to maximise the potential to use sustainable transport modes;

- It is noted that the impacts of planned growth at the airport are likely to be experienced across a much wider area than just the immediate vicinity of the airport and therefore a S106 agreement with all affected authorities will be required, to ensure that GAL properly mitigates those impacts. This agreement should include a review of the amount of funding and delivery mechanisms available to local communities;

- GAL is encouraged to publish in full its evidence base on noise and air quality, to allow neighbouring local authorities to carry out a detailed review;

- MSDC encourages GAL to prepare detailed housing and employment assessments which identify the impacts of planned growth on housing need and infrastructure, to support any DCO application. Such reports would provide the information required by local authorities to enable them to properly consider how planned growth is accommodated and mitigated;

- MSDC encourages GAL to actively engage with Natural England, the statutory body with responsibility for European designated sites, to agree the process by which a HRA should be undertaken, and to seek Natural England's formal agreement to that HRA; and;

- MSDC requests that the Council is fully consulted throughout any DCO process, and is included in any formal and informal engagement strategy before, during and after the DCO process has taken place.

Overall, MSDC is concerned that the impacts of planned growth on the wider area are fully understood and that the emphasis is to ensure that any growth remains sustainable and beneficial to the area. The Council considers that exploring the possibility of sustainable growth in the airport will require significant local engagement with this Council as part of a well-resourced programme, and agreement in principle to an appropriate package of local mitigations where appropriate.

These issues are set out in more detail below.

Development Options

The Masterplan sets out three options for growth to 2032. These do not appear to be mutually exclusive, and indeed the Masterplan makes multiple references to the fact that they are likely to follow sequentially. Paragraph 5.3.16 states that:

'(*The) standby runway scheme would allow the airport to grow nearer-term whilst the longer-term opportunity of a totally new runway would still exist.'*

The impacts of each option are not evidenced or identified in the Masterplan, nor is there any information on the cumulative impacts of those options. MSDC can therefore only consider these options fully once there is further information on:

- the delivery framework
- the environmental and social impacts, individually and cumulatively
- the airport's mitigation strategy.

The Council does however note that this gap in information is acknowledged in the Masterplan.

At this stage MSDC would raise a number of issues relating to proposed growth at Gatwick; set out by proposal below.

Option 1 – Making Best Use of the Existing Runway

MSDC notes that in its recently published consultation document Aviation 2050 Strategy – The Future of Aviation, the Government has confirmed that airports 'beyond Heathrow' should make best use of their existing runways, subject to environmental issues being addressed.

This option proposes that growth at the airport will increase due to the increased efficiencies associated with the Government's airspace modernisation programme, and by using larger aircraft. MSDC notes that, under this scenario, growth of the airport continues using just the main runway and that aircraft traffic movements increase from 55 per hour to 60 per hour, with an associated increase in passenger numbers from the existing 45 million per annum, to up to 61 million by 2032.

Paragraph 5.2.22 states that '*we do not foresee any significant changes to the airport boundary or the configuration of the airport.*' It would be useful if GAL could clarify what would constitute a significant boundary change, and whether any changes are required at all.

It is this Council's view that this option would require significant infrastructure works and would result in an increase of more than 10 million passengers, and would therefore require a DCO to secure planning permission.

Airspace Management Strategy

MSDC notes that in its recently published consultation document Aviation 2050 Strategy – The Future of Aviation, the Government has confirmed its intention to deliver the airspace management strategy. The Strategy notes the interdependence of airspace at airports in the South of England, and proposes to introduce legislation to require airports to implement airspace changes. The airspace management strategy has the potential to change established flight paths, by separating aircraft by time management, rather than by the physical distance between them.

Until more details of the Government's Airspace Management Strategy is known, and specifically the impacts on flight paths around Gatwick are understood, it is difficult to comment in any detail on the likely impacts of the proposed options in the Masterplan. The introduction of this new Strategy provides significant uncertainty.

Highways

Paragraph 5.2.15 assumes that improvements to North and South Terminal roundabouts and the current improvements to the M23 Smart Motorway will suffice to mitigate the impacts of option 1. It notes that '*the local road network will be able to accommodate growth to around 60 mppa without significant (*our underlining) *deterioration in performance.'* MSDC does have concerns that this approach has not been robustly tested or demonstrated.

The works to the M23 to convert it to a 'smart' motorway have been planned for some considerable time, and are intended to meet the current issues of congestion on that stretch of road.

GAL is strongly encouraged to carry out a robust modelling exercise to understand what further additional works would be required to the strategic and local road infrastructure, to provide the capacity on the road required to support planned growth.

In addition, any growth at Gatwick will impact on minor roads in the area, which already suffer from congestion as road users use them to avoid the congested main roads.

This Council considers that the scope of any transport modelling should include the minor road network, particularly minor roads to the east of the airport.

Noise

The main noise sources experienced by Mid Sussex residents are from aircraft arrivals and departures. The north of Mid Sussex District and, in particular East Grinstead, is the most affected by noise associated with aircraft arrivals and easterly departures.

The Masterplan states that, under Option 1, the scheduled runway movements could increase from the current maximum 55 flights per hour, to around 60 movements per hour in peak periods in 2032, with additional flights outside the current peak times.

The possible introduction of quieter 'new generation' aircraft could mean that Gatwick's noise footprint would continue to reduce despite the increase in aircraft movements. GAL is encouraged to do all it can within its powers to facilitate and incentivise the introduction of quieter aircraft using Gatwick Airport. However, this needs to be clearly evidenced and as noted, the number and frequency of flights would increase. Further details on MSDC's concerns about noise are set out below.

Option 2 – Making Best Use of the Existing Standby Runway

GAL's legal agreement with West Sussex County Council, signed in 1979, which precluded the simultaneous use of the stand-by runway with the main runway ends in 2019. Option 2 sets out GAL's proposal to seek consent, potentially through a Development Consent Order (DCO) to use the existing stand-by runway for departures of smaller aircraft, alongside the operation of the main runway, by the mid 2020s.

The use of the stand-by runway would continue to rely on two terminals, but could result in passenger numbers increasing to 68-70 million passengers per annum by 2032 and to increase its cargo capacity from 100,000 tonnes to 300,000 tonnes per annum. This proposal would require widening the stand-by runway by 12m. It would also require the construction of new taxi-ways, within the airport footprint, to replace the taxiway that the standby runway currently provides.

MSDC understand that this proposal would mean flight path patterns would remain similar to the existing flight paths, although there could be between 10 and 15 additional hourly aircraft movements in the peak hours, an increase from 55 to around 70 flights per hour.

Development Consent Order (DCO)

In order to secure planning permission to use the existing standby runway for departures, GAL needs to submit a planning application to the Secretary of State through the Development Consent Order (DCO) process. The DCO process is used for nationally significant infrastructure projects which will increase use of an airport by more than 10 million people.

The 2008 Planning Act identifies which local authorities should be consulted about planning applications and Development Consent Orders. Mid Sussex District borders Crawley Borough, and therefore under section 43 of the Planning Act 2008, MSDC must:

- be consulted under sections 42 and 47 of the Planning Act 2008;
- be consulted by GAL before any application for a DCO is made;
- be notified by the Secretary of State once the application has been made;
- be invited to submit a Local Impact Report (LIR); and
- be invited to take part in discussions as to how the examination should be conducted.

Noting the contents of the draft National Policy Statement on Airports and Section 104 of the 2008 Act, Mid Sussex suggests that the relevance of the draft National Policy Statement to Gatwick is unclear. MSDC hopes that the policy position will be more defined before Gatwick choose to progress any DCO.

S106 agreement

The current S106 agreement is between GAL, West Sussex County Council and Crawley Borough Council. However, the impacts of the scale of proposed growth at the airport, under any of the three options, will be significantly wider than the immediate areas around the airfield. It is anticipated that a new S106 agreement between GAL and a greater number of neighbouring authorities will need to be agreed to support any planning application secured through the DCO process.

Through the DCO process, MSDC will identify the impacts of proposed development on the District, and the S106 agreement should reflect the mitigation required to offset all impacts in the wider area, including any identified and agreed in Mid Sussex District.

It is anticipated that S106 obligations could include, but not be limited to, contributions to affordable housing, social and green infrastructures, highway and sustainable transport improvements, as well as air quality monitoring, and noise monitoring.

The Gatwick Foundation Trust

The Gatwick Foundation Fund was established in 2016 to work in partnership with the Community Foundations in Kent, Surrey and Sussex. The Masterplan notes that this has been set up to oversee £300,000 of annual grants for worthy causes across the region. However, the Trust audit report notes that only £192,000 was granted in 2016, and £198,000 in 2017, significantly under the indicative annual budget of £300,000. In 2016, the town of East Grinstead received only £8,200, and in 2017 received no funding.

In light of the significant growth planned at Gatwick, and the range of impacts that this is likely to have on communities in a wide area around the airport, GAL is encouraged to review and increase the funds available to local communities, and to ensure that funds are fully distributed to those most affected by the airport and its operations.

Highways

MSDC is concerned that the surface access management strategy properly mitigates the impact of the significant increase in passenger numbers associated with Option 2, and in the proportionate increase in staff working at Gatwick, on the region's roads and railway links.

MSDC notes that in its recently published consultation document Aviation 2050 Strategy – The Future of Aviation, the Government proposes to set out a duty for airports to work with local Councils to develop surface access strategies. MSDC requests that GAL works collaboratively to develop a surface access strategy which includes road, rail, bus services, cycling and walking.

We note that the growth in passenger numbers associated with Option 2 would require upgrades to the existing highways to accommodate the planned growth; the Masterplan identifies that upgrades to the two main roundabouts, (at North and South terminals) are required, but it is not clear whether these works are required to support Option 1, or specifically to accommodate the growth associated with Option 2.

Paragraph 4.4.34 states that:

'The capacity that these road improvements deliver is sufficient to cater for forecast airport and non-airport demand, based on airport growth and DfT national traffic models.'

However, it appears from the Masterplan that GAL is not proposing any further improvements to the M23 motorway itself, and is relying on the SMART motorway works to the M23 which are currently being delivered to provide an extra lane on the approach to the airport. MSDC's concerns about this reliance on the current improvements to the M23 are set out under Option 1 on page 4, above.

MSDC is concerned that there is also no mention of corresponding improvements to the slip roads from the motorway, or to the spur road which connects the motorway to the airport.

Paragraph 5.3.30 states that:

'If the standby runway scheme is taken forward, the optimum highways solution would be identified through further road modelling and through discussion with Highways England and the Local Highway Authorities.'

The highway modelling work commissioned to support any DCO application should cover a wider area than just the immediate environs of the airport, so that the full impact of planned growth on the road network in neighbouring authorities, such as along the B2028 through Sharpthorne and Turners Hill, the A264 to Copthorne and East Grinstead and along the length of the A23/M23, is properly understood. MSDC encourages GAL to work with MSDC and WSCC to agree the area that the highway modelling should cover. Attention is particularly drawn to traffic conditions in East Grinstead and effects on the Ashdown Forest, which is in part a consequence of the A22/A264 route to the airport as discussed further below.

MSDC notes that GAL has been unable to support Reigate and Banstead's proposal for a new strategic employment location at Land west of Balcombe Road, Horley ('Policy Horley 9'), which will provide 200,000 sqm business floorspace and 10,500 sqm floorspace for supporting facilities, on the basis of the likely traffic flows which would arise from the allocation.

In particular, the GAL response states that RBBC's highways assessment does not adequately take account of its future growth plans and its forecast growth in annual passenger numbers. However, aside from background growth, any plans relating to the standby runway are yet to be tested through the DCO process and to be included as committed development in transport planning terms.

MSDC suggests that similarly, as a broader principle, the Gatwick Masterplan should acknowledge and take account of the wider growth agenda across its neighbouring authorities, when considering its impact on the national and local highway network.

Air Quality

Local pollution caused by the airport comes predominantly from road traffic, with a smaller contribution from aircraft. The areas most affected are Crawley and Horley and the airport are working with local authorities to monitor and where necessary mitigate.

Additional road traffic caused by an increase in aircraft movements will adversely affect pollution levels on all routes to and from the airport, including through East Grinstead. However, without full, detailed modelling, it is not possible to comment at this stage on the significance of any change.

Ashdown Forest

Section 6.3 of the Masterplan refers to air quality, and to the nitrogen deposition caused by the airport's operations, but the Masterplan does not refer to air quality issues associated with surface road traffic which visits the airport.

Immediately to the east of Mid Sussex District lies Ashdown Forest Special Area of Conservation. This is a European site which is designated for its dry and wet heathland habitats, which are vulnerable to impacts from nitrogen deposition. Any development which takes place in Mid Sussex District and in neighbouring districts, which generates traffic which passes through the Ashdown Forest, is subject to a Habitats Regulations Assessment, to determine whether it will have a Likely Significant Effect on the habitats of the Ashdown Forest.

The transport assessment which will be prepared by GAL to support a DCO application will identify the distribution of the road trips associated with the airport. If this shows that traffic uses the roads through and near to the Ashdown Forest to gain access to Gatwick airport, as MSDC believes it will, based on existing Gatwick travel behaviour, a Habitats Regulations Assessment will need to be prepared, to identify whether there is a likely significant effect of that traffic on the Ashdown Forest alone or in combination with other committed development in the sub region.

If the HRA shows that there is a likely significant effect, an Appropriate Assessment will be required. MSDC understands that it will be for the Secretary of State to determine whether an Appropriate Assessment is required and for the Secretary of State to carry out the Appropriate Assessment, if one is required.

The importance of the Habitats issues and the need to consider effects in combination with other committed growth has been confirmed through the Wealden[1] decision. In addition, following the Court of Justice of the European Union (CJEU) in *People over Wind*[2]*,* Gatwick will not be able to rely on potential mitigation to screen out locally significant effects, as has been suggested in the past for major infrastructure.

Sustainable transport

The Masterplan notes the recent improvements to rail services at Gatwick, such as the extension of Oyster Card technology, and the introduction of new rolling stock on the Gatwick Express service. The planned upgrade of Gatwick Railway Station is also welcomed.

However, MSDC notes that many of its residents stand all the way to London at peak hours on the trains, and suggests that the improvements set out above only address the historic and existing overcrowding and congestion of the train services through Gatwick, particularly those running at peak hours. Further improvements to the rail infrastructure, the railway station and Brighton Main Line are needed to properly mitigate the impacts of the increased number of passengers and staff anticipated in Option 2.

[1] (Wealden v SSCLG [2017]).
[2] Case C-323/17 CJEU, April 2018

As well as seeking to make major improvements to the frequency and capacity of the rail service, the Masterplan should also make stronger references to the potential to increase the number of passengers and staff who travel to Gatwick by rail, to reduce the highways impacts of planned growth. The recent improvements to rail infrastructure, which have provided direct services between Gatwick Airport and Cambridge, Peterborough and Bedford, as well as planned improvements to Reading and the West Coast Main Line associated with the Cross Rail project present an opportunity to increase the catchment area from which passengers and staff can easily access Gatwick by efficient train services.

GAL is encouraged to work closely with Network Rail to effect a significant improvement in the capacity of the rail infrastructure and in the frequency, reliability and capacity of trains, for the benefit of commuters and Gatwick visitors and staff.

The Masterplan identifies that Gatwick is served by National Cycling Route 21, and notes in paragraph 4.4.38 that:

'By replacing and enhancing the facilities we provide at each terminal are starting to reverse a decline in staff cycling in recent years.'

However, there is no other reference in the Masterplan to take the opportunity to effect significant modal shift in staff travel patterns. The document does not even refer to modal shift. The planned growth offers an opportunity to deliver sustainable travel patterns for an increased number of staff, through a travel plan which incentivises cycling, walking, car sharing and electric car use. The Masterplan is sadly silent on these.

High Weald Area of Outstanding Natural Beauty

A large area of northern Mid Sussex District lies within the High Weald Area of Outstanding Natural beauty (AONB). The National Planning Policy Framework notes that '*great weight should be given to conserving and enhancing landscape and scenic beauty in … Areas of Outstanding Natural Beauty*.'

The planned growth at Gatwick is likely to impact on the High Weald AONB in terms of increased road traffic, potential reduction in air quality, and development pressure for new homes and employment premises. The Masterplan should recognise the importance of the AONB, its proximity to Gatwick Airport and the need to ensure that impacts from planned growth will be mitigated fully.

Car Parking

Paragraph 4.4.42 notes that GAL will provide an additional 9,565 car parking spaces; 1,565 have recently been provided at South Terminal; 3,000 will be provided in a new multi storey car park at North Terminal, 1,500 new spaces will be provided in a multi storey car park at the South Terminal and '3,500 spaces delivered by consolidation at our long-stay self-park product into one site and optimising the configuration of current storage areas.'

MSDC understands that the construction of a new, northern taxi-way, to replace the taxi-way currently provided by the standby runway, will require land which is currently used as surface car parks.

MSDC therefore has significant concerns about car parking provision to support planned growth. Specifically, 1,565 spaces have already been provided, and should therefore be counted as the baseline position, rather than net additional provision. In addition, the spatial implications of '3,500 spaces delivered by consolidation of our long-stay, self-park product' is unclear. MSDC would like a better understanding of what this means.

In principle, consolidation of on-site car parking may be supported, but the above appears to imply that 3,500 additional spaces will be created off-airport, with attendant implications for greenfield land take, pressure on sites surrounding the airport, and congestion on local roads.

MSDC also has concerns that current arrangements for pick up and drop off are inadequate, and cause congestion outside both terminals. GAL is strongly encouraged to use its work on a car parking strategy as an opportunity to address this issue, and to make improvements to pick up and drop off facilities.

Employment

MSDC notes the anticipated growth in employment from 79,000 jobs to 91,000 associated with Option 2. GAL is encouraged to use the planned growth as an opportunity to maximise training and apprenticeships for local people, to increase local skills and productivity and to provide opportunities for employees to gain qualifications through their work at Gatwick.

It is not at all clear from the Masterplan where the additional workforce will travel from to meet the employment opportunities created on the airport, given the low levels of unemployment in this district. However, MSDC understands that GAL is in discussion with Croydon and with Brighton and Hove Councils to identify whether some of the unemployment in these areas can be addressed through job opportunities at Gatwick. If significant numbers of staff travel from these areas, this will contribute further to overcrowding on the trains at peak hours. GAL is strongly encouraged to work closely with Network Rail to provide more trains at these hours.

To date, no evidence has been published which identifies how the proposed scale of growth or the types of jobs set out in the Masterplan will be provided. A comprehensive analysis/strategy is required, which provides detail on the range of type of jobs which will be provided. MSDC reserves the right to comment on the employment situation once a full evidence base has been published.

Housing

The Masterplan makes no reference to the housing which would be needed to support the proposed new employment opportunities at Gatwick, or the anticipated economic growth associated with the options for growth. This is a significant omission, and MSDC encourages GAL to include a section on housing in a revised draft of the Masterplan, if only to acknowledge that GAL will need to identify the housing growth associated with the planned increase in direct and indirect job numbers, and will need to work with Local Planning Authorities to agree a strategy for the provision of those homes.

Currently, 24,000 people work at Gatwick Airport, with a further 37,000 indirect jobs and 10,000 ‘catalytic’ jobs created; a total of 71,000 jobs, with 79,000 jobs forecast by 2028. Figure 5.19 of the Masterplan identifies that employees of Gatwick airport come from a wide geographical area, including from East and West Sussex, and from Surrey and Kent.

Given its understanding of local labour markets and commuting, Mid Sussex does not believe such growth would be entirely supported by ‘commuter clawback’.

MSDC strongly encourages GAL to prepare a detailed housing report which sets out the impacts of planned growth on housing need across the neighbouring authorities and on infrastructure provision, to support any DCO application. Such a report would provide the information required by local authorities to enable them to properly consider how planned growth is accommodated.

We suggest that only when expansion of passenger numbers has been consented, will local authorities be able to consider the housing need associated with that growth as a material consideration to inform reviews of local planning policy, and to determine planning applications.

Noise

It is assumed that an Environmental Statement (ES) will be submitted to support a DCO, and that the evidence base to support that ES will be published to enable local authorities and others to review the data, and comment in a more informed way.

At present, it is not possible to draw concrete conclusions from the information provided. The Masterplan acknowledges that further acoustic details are required and it is therefore sensible to reserve judgement until these fuller details are available.

Although preliminary analysis set out in the Masterplan suggests that total aircraft noise generated by Option 2 would be broadly similar to today's level, this has yet to be demonstrated and the numbers of noise events (i.e. flights) would increase significantly.

Mid Sussex's view is that there should be scope for the number of people affected by day-time noise in 2028 and 2032, with the standby runway scheme in operation, to be broadly comparable or better than today.

There is a more apparent reduction in predicted night-time noise as there is assumed to be no traffic growth in the night quota period and therefore the positive impact of quieter aircraft types is more pronounced. However, there will be more flights during the "shoulder periods" (just outside the night time periods, when people may still be sleeping/resting). MSDC considers that the extent of night time activity may need to be considered carefully in the context of any expansion of air movements.

This is of particular concern given the current night flight regime at Gatwick expires in October 2022, and that the Government expects to begin the process of reviewing the rules for night flying at Gatwick in the second half of 2019.

The Civil Aviation Authority's (CAA) Environmental Research and Consultancy Dept (ERCD) have produced predicted noise contours for 2028 and 2032 based on use of the existing main runway and for the standby runway and these preliminary results suggest that the effects of greater numbers of aircraft movements will be broadly offset by changes in the make-up of the fleet to quieter aircraft.

It should be noted that the predictions are based on assumed traffic forecasts and fleet changes and the Masterplan acknowledges that there is "inevitable uncertainty" involved and that a more detailed noise assessment will be required.

Whilst the broader conclusion, that potentially quieter aircraft may to some degree compensate for increased traffic, is accepted, there are a number of other factors that should be considered.

Research has consistently shown that in general, when given the choice, people tend to prefer fewer noise events with equivalent total noise – in other words they prefer fewer, but louder events, to more, but quieter events. Another way of putting this would be that, for example, people would prefer to be overflown by 3 wide body jets than say, 6 smaller/quieter aircraft. The number of noise events has an effect on the recipient, not just the total noise level.

The Masterplan proposals would result in a significant increase in the number of flights, around 27% by 2032, from 55 to 70 flights per hour. One metric commonly used for describing aircraft noise by measuring the number of noise events above a certain level, the N metric (e.g. N60/N70 etc.) has not been provided at this stage.

The noise metric that has been used (LAeq) is a way of averaging the total noise over a given period. The Government has previously used a figure of 57dB LAeq, 16 hr (i.e. averaged over a 16-hour period) as the significant effects threshold, although more recent research suggests that 54dB LAeq,16hr is a better approximation. It should be noted, that this metric is more useful for constant noise such as the roar of traffic from a distant motorway, or the constant hum of an extractor fan, than for intermittent or irregular noise interspersed with quieter periods. It is also known that intermittency in a given noise source increases the noticeability and the annoyance factor of that noise source (e.g. BS4142). As the frequency with which planes pass over residents increases, so may the annoyance.

In acoustic terms, doubling the number of aircraft movements would increase the overall LAeq by around 3dB, which is a “just noticeable” difference. However, to a resident on the ground, doubling the number of flights would clearly be a significant change likely to increase annoyance. It is therefore sensible to use other, additional noise metrics, such as the N number, above, in combination with LAeq to fairly assess the impact upon residents. The N number can be directly linked to health effects (stress and annoyance, cardio-vascular disease, sleep disturbance and fatigue) so without this information only limited conclusions should be drawn from the information provided.

Option 3 – Safeguarding for an additional runway to the south

Option 3 proposes to continue to safeguard land to the south of the main runway for a southern runway. Full operation of a southern runway, with a new terminal, could result in up to 95 million passengers per annum and an increase in aircraft movements from the current baseline of 55 movements per hour, to 98 movements per hour.

MSDC entirely reserves its position on this option, although would draw attention to its earlier response in the context of the earlier Airports Policy Commission. It is noted that the proposed level of growth associated with this Option represents almost a doubling of the existing capacity. This will have significant impacts on all the issues considered under Option 2; highways impact, car parking, sustainable transport, employment, housing, air quality and noise.

MSDC is concerned that this option would require the diversion of the A23 to the east of Gatwick. The impact these works would have on the surrounding highway network would need to be properly understood.

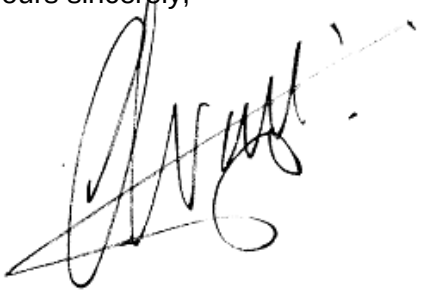
Summary

In summary, MSDC supports the principle of growth which is demonstrated to be sustainable economically, socially and environmentally, and which fully mitigates its associated impacts. However, the Masterplan does not provide the level of information required to assess whether the plans for growth are sustainable.

MSDC will need to be provided with more detailed evidence to fully assess the impacts of growth at Gatwick, and reserves the right to comment in more detail as more information becomes available.

MSDC would also expect to be actively involved throughout the DCO process over the coming months.

Yours sincerely,



Cllr Garry Wall
Leader, Mid Sussex District Council