

CHARLWOOD PARISH COUNCIL

Serving the communities of Charlwood, Hookwood and Norwood Hill

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Response to Gatwick Airport Emergency Runway Consultation

The proposed expansion of Gatwick will have a catastrophic impact on the parish of Charlwood, the local authority sharing the longest boundary with the Airport.

Charlwood Parish includes the communities of Charlwood, Hookwood and Norwood Hill. Charlwood itself is an important historic village with a Grade 1 Norman Church and over 80 listed buildings and features. We are a thriving community with a Village School, four pubs and many clubs and societies.

Every single member of our community will have to bear the brunt of a bigger Gatwick. The detrimental impacts will come from: the planned increase in flight numbers; increased number of HGV vehicles coming through the parish during the construction phase; increased number of vehicles taking passengers to and from the airport; increased ground and air noise; increased emissions both of carbon and other harmful substances; increased damage to mental health; increased disruption to sleep patterns. For those reasons the Parish Council will want to speak and make its views known at a Public Hearing.

We have the gravest concerns for our community should permission be granted to bring the Emergency Runway into regular use. Mrs Helyn Clack, the chair of Surrey County Council and a resident of Charlwood, has stated that the two villages would be “annihilated” if the Development Consent Order succeeds and those villages would become almost “uninhabitable”.

In 2019, pre-Covid, there were 45 million passengers a year going through Gatwick. Most of those were concentrated in the summer months. The experience was intolerable for residents; the escalation of ground and air noise and the pressures placed on the local road network that was not designed to handle that level of traffic.

Now GAL predicts in their wonderful new world that passenger numbers will increase to 75 million per year. Flights will increase from 55 per hour to 75 per hour, more than one per minute. The effects would be horrendous.

Recovery at Gatwick is one thing – going for growth at this level will be ruinous for community life.

We have chosen to identify and list our concerns and opposition to this proposal under the following headings:

- Noise Impacts
- Air Quality
- Traffic Escalation
- Flooding Risk

Obviously we focus on the impacts that would be apparent once the Emergency Runway is in active commercial use. But long before then our community is scheduled to suffer through the construction phase. For five years - and 24/7 - a major construction programme would be carrying on next door to us. A large proportion of those works would happen at night. So more noise, more vehicles on our roads, more emissions, more disruption to sleep and family life. After that there would be further construction work on hotels, car parks etc for another ten years.

The Parish Council believes that the mitigation measures proposed by GAL are either woefully inadequate or misguided. At the time of the discussion over runway expansion in the South-East, Gatwick promised residents rate relief, a ban on night flights and improvements on insulation, including roof insulation. No such promises have been made with this project.

Accordingly, we have drawn up a list of requirements (without prejudice to any decision) to try and ameliorate the impacts of Gatwick expansion and make life less worse for those residents who neighbour a major international airport that is scheduled to grow even bigger in size.

Noise Impacts

There was a silver lining during the pandemic for the residents of Charlwood and Hookwood – a welcome respite from the constant noise emanating from Gatwick Airport. Add to that the cleaner air that was noticeable to everyone living in the parish.

A further bonus was the improvement in sleeping patterns through the reduction in night flights. Our residents regularly remarked during Lockdown how their health had improved through the reduction in air travel – and especially the reduction in night flights.

The local community has long had to bear – and become used to – these detrimental impacts. Exposing it to an increased number of flights - and numbers of passengers filling those flights - would be an additional and intolerable burden.

The noise impacts suffered by our community through living adjacent to a major international airport can take one of three forms:

- Air noise – noise from aircraft in the air or departing or arriving on a runway.
- Ground noise – noise generated from airport activities at ground level including aircraft taxiing and traffic within the airport boundary.
- Road traffic noise – noise from road traffic vehicles outside the airport on the public highway.

Should the proposals go ahead another noise category would be added:

- Construction noise and vibration – noise and vibration from temporary construction of the proposed development, including the use of construction compounds.

Because we are a rural community the noise impacts are far greater than that experienced in urban communities such as around Heathrow. The ambient noise in the rural environment is significantly lower than in the urban context.

Gatwick's analysis of the noise impacts of its proposed expansion is deliberately misleading. Its noise envelope proposals are inconsistent with CAA guidance and unacceptable. They propose inappropriate metrics and limits, do not comply with government policy, lack adequate enforcement arrangements and have been put forward without stakeholder discussion, in contrast to the approach taken by other airports.

GAL state that there would be less impact from aircraft noise in the future than in 2019. That's a bold statement – some would term it a ridiculous statement – considering there will be 35 per cent more flights. Our advice is that those figures rely on uncertain fleet replacement assumptions.

The per-flight noise reductions Gatwick is projecting from the use of more modern aircraft are modest, generally less than 3 dB for arriving aircraft. Noise changes of this level are not usually detected by the human ear while even small changes in the frequency of noise events is highly noticeable to all communities under flight paths or near the airport. It is obvious that a 35% increase in overall flight numbers would have profound adverse impacts on all relevant communities from a noise standpoint.

The Preliminary Environmental Information report states that between 1-2km of the western end of the runway, around 40 Charlwood properties (in Russ Hill and Ifield Road) are predicted to have a worse case change in noise levels of between 3 and 6dB. Figure 14.9.22 identifies noise change of greater than 3db when the 2032 base case is compared to the proposed project.

Mole Valley's Environmental Health Officer considers that justification should be provided in the Environmental Statement as to why the properties at these locations have not been identified as experiencing a Major Adverse effect. Additionally, greater

effort to share the available technology benefits must be made to mitigate these impacts.

The Parish Council is unhappy that GAL suggests the noise envelope should rely exclusively on Leq data (using average noise in a defined period) whereas a focus on noise event frequency would be a fairer analysis. In our view noise event frequency is as important to many people as average noise levels. We therefore believe frequency metrics should be primary metrics and accorded the same weight as Leq metrics.

GAL simply presented its preferred option for a noise envelope with no prior engagement with representatives from local communities, local authorities and other stakeholders in its design. This is contrary to best practice. A design group needs to be set up to test options. Independent scrutiny and enforcement of the noise envelope needs to be addressed.

The Leq metric does not adequately reflect the impact of aviation noise on communities, because it fails to take account of the increased frequency of overflight that communities would suffer if Gatwick was permitted to expand.

The majority of the population of Charlwood and Hookwood (approximately 2500) live within the Gatwick night actual model split 48 leg contour, with some within the 51,54,57 and even a few within the 60 leg contours. Those within the 57 leg and above are in the zones considered by the World Health Organisation as being dangerous to public health.

GAL proposes to limit its 51dB noise contour to 146.7km² in 2032 and 125.7km² by 2038 – in 2019 this contour covered 136 km². However there are no proposals to limit or manage noise outside this contour. Gatwick's proposed metric takes no account of the very significant number of people living outside the proposed 51dB contour who are already adversely impacted by Gatwick aircraft noise. A wider range of metrics must be used that covers all such areas. We do not accept that 51dB represents a limit below which day period noise impacts can be disregarded.

In a document entitled 'Environmental Noise Guidelines for the European Region', the World Health Organisation states with regard to aircraft noise: "For average noise exposure, the GDG [Guideline Development Group] strongly recommends reducing noise levels produced by aircraft below 45 dB Lden, as aircraft noise above this level is associated with adverse health effects. For night noise exposure, the GDG strongly recommends reducing noise levels produced by aircraft during night time below 40 dB Lnight, as aircraft noise above this level is associated with adverse effects on sleep.

A University of London study into the effects of aircraft noise on health concluded: "The health effects of environmental noise are diverse, serious, and because of widespread exposure, very prevalent. For populations around airports, aircraft noise exposure can be chronic. Evidence is increasing to support preventive measures

such as insulation, policy, guidelines, and limit values. Efforts to reduce exposure should primarily reduce annoyance, improve learning environments for children and lower the prevalence of cardiovascular risk factors and cardiovascular disease.”

Regarding night-time construction noise, just under 200 properties are predicted to be adversely impacted above the Significant Observed Adverse Effect Level (SOAEL). Fourteen of these properties are located in Charlwood and 13 are located in Hookwood.

Environmental Health Officers agree that loss of sleep is a key detriment to quality of life. The Environmental Statement needs to provide more comprehensive details to reveal:

*The process by which a resident’s needs will be assessed

*The level of disturbance to the residents and their properties

Gatwick communities are unfairly penalised by the current aviation regime. In the summer – the time of greatest impact because in the warmer months residents might like to sleep with the bedroom windows open - we have nearly 40% more night flights than Stansted and three times the number at Heathrow.

At night, the ground noise, the noise associated with aircraft taking-off and landing, the roar of engines sitting on the end of the runway, taxiing to and from the terminals, the noise of all the support vehicles, is so much greater than during the day.

Then there is the ancillary noise and disturbance to the community caused by airport employees and passengers driving through Charlwood and along the A217 at Hookwood en route to the airport at night, to service the first flights of the day.

That probably means airport workers are leaving their homes and starting up their cars at, about 03:30. Once woken at that time their neighbours would not be likely to be able to get back to sleep and would suffer a health impact. The same disturbance is experienced by residents neighbouring the many hotels and bed and breakfast establishments in the community. Parking by passengers or taxis on local roads in the early hours is also a cause of much annoyance.

The noise mitigation measures Gatwick has proposed are inadequate. The airport should be required to compensate all residents local to the airport to at least the extent offered in the course of the Airports Commission’s work in 2014. It should also be required to compensate all residents living under flight paths for loss of property value.

To sum up: the combined and cumulative effects of the proposed scheme on the health of the population of Hookwood and Charlwood, should be assessed. Both these communities are close to the airport and will be exposed to more noise disturbance and likely poorer air quality arising from construction and the operation of the expanded airport.

The detailed local health impact assessments should fully consider noise, air quality and potential lighting impacts from a major airport with lights on 24 hours a day, and combined and cumulative effects. Such assessments should inform compensation and mitigation packages. In addition, greater overflight and noise disturbance from

construction could adversely affect property values and this should be scoped in and inform compensation packages.

Air Quality

Air pollution is said to be the biggest public health threat with a 2016 study by the Royal College of Physicians putting the number of premature deaths resulting from it at around 40,000 in the UK. This is primarily due to nitrogen dioxide (NO₂) and particulates (notably PM_{2.5}).

In September 2021 the World Health Organisation strengthened its safe guidelines for limiting air pollution to 10 µg/m³ annual mean for NO₂ (down from 40 µg/m³ which is the current UK and EU standard) and to 5 µg/m³ annual mean for PM_{2.5} particles. The average nitrogen dioxide concentration stands at around 27 µg/m³ at sites around the airport. Given that GAL do not forecast any change in concentrations, the revised WHO guideline value is of significance if the project goes ahead.

It is concerning that there are currently no levels set for the measurement of ultra-fine particles originating from non-exhaust emissions of road traffic. This needs to be rectified by the Government and addressed by GAL.

Turning to CO₂ emissions - the forecast is for 7.575m tonnes at Gatwick in 2038 compared to 5.11 tonnes in 2018 – an almost 50% increase in CO₂ emissions. For the local community, those figures are alarming. Charlwood and Hookwood suffer pollution from incoming and outgoing flights – Charlwood when the wind is coming from an south east direction; Hookwood when the wind is from the south.

The statistics clash alarmingly with the Government's net zero legal commitment for 2050 and its objective "to ensure that the aviation sector makes a significant and cost-effective contribution towards reducing global emissions". It also flies in the face of the international commitment to stay within the 1.5C global warming limit.

The airport should not be permitted to expand unless and until it shows it can do so without adverse environmental and noise impacts. All impacts should be measured from a 2019 baseline so the cumulative effects of growth are properly assessed.

The increase in road traffic numbers that we will witness in our parish will also diminish air quality. There will be pressure points in both villages where traffic builds up particularly at peak periods. In some cases children are walking past these points on their way to school and subject to lines of vehicles spewing out all their unhealthy emissions.

Traffic escalation

The proposed Gatwick expansion would result in a steady and substantial increase in cars travelling to the airport, with the number of passengers accessing the airport by car in 2047 estimated to be over 40% higher than 2019 levels. This will impose an

unacceptable burden on the local road network - and the communities served by those roads. A road network, moreover, that is already struggling to cope with traffic numbers before any increase takes effect.

Every time there is a hold-up on the M25/M23 passengers will inevitably access Gatwick via the rural roads. With passenger and vehicle numbers increasing so significantly, motorway delays will obviously escalate proportionally. More and more airport traffic will be diverted through Charlwood and Hookwood as well as neighbouring rural villages such as Newdigate, Leigh, Brockham.

Equally worrying is the prospect of HGV vehicles going to and from the airport during the construction phase (a 15-year 'phase' no less !!) and passing through our villages. In addition increased vehicle movements are predicted for the proposed doubling of freight air travel as well as all the LGV and HGV movements to service increased day-to-day airport operations and maintenance.

The prospect for our community is devastating. GAL makes the hollow claim that most of the increase in passenger numbers will be accommodated on public transport. And in the next breath they reveal plans to construct 25,000 additional car park spaces as well as substantial highway capacity enhancements. The juxtaposition of those two statements does not need further comment.

GAL talks about 60% of passengers arriving via sustainable transport by 2030 – an increase from 45% in 2018 – but project modelling estimates that the most they will achieve by 2047 would be 56%.

Gatwick's proposals are inadequate and unacceptable. There should be no increase in the number of passengers accessing the airport by road and no increase in highway trips. This must be modelled and provided for in its proposals.

Electric vehicles are included as contributing to sustainable transport modes; however, it should be acknowledged that they have no impact on reducing congestion. The number of vehicles on the rural roads will still be more than the local network can cope with.

Instead the airport should ensure provision of sufficient public transport capacity to accommodate all the additional demand and be required progressively to reduce the absolute number of passengers, staff and other users using road transport as a condition of any expansion. A reduction trajectory should be set, monitored and enforced.

At the moment proposals for investment in public transport amounts to rather vague proposals to work with local bus operators to support a limited number of bus routes serving the airport and additional infrastructure to transport passengers from rail platforms into the airport. Gatwick is relying on already committed rail enhancements to support the additional passengers that will use the airport. The impact of other

users of this rail corridor switching from road to rail transport but not travelling to and from the airport is not considered and should be. Additionally, it should be noted that Gatwick is only served by a north/south train line, there is no rail network running from east to west, therefore this exacerbates road use from the west through Charlwood parish.

Gatwick's proposed expansion will further affect an area that is already suffering the effects of a mismatch between growth and the ability of the transport (and other) infrastructure to cope. It is also the case that there is a significant number of commuting journeys in and out of nearby Crawley leading to daily congestion as well as high levels of air pollution. This is also generating heavy traffic on local rural roads, including through the villages of Charlwood and Hookwood. On top of this, the area is becoming a focus for new development with Hookwood earmarked for 550 additional new homes under the Mole Valley Local Plan. Extensive housing is already underway within two miles at Westvale Park and The Acres, with 10,000 houses planned within three miles. More people = more vehicles = more congestion on local transport routes.

Increases in traffic, whether from cars or goods vehicles, are likely to lead to an increase in accidents especially where traffic is concentrated in areas neighbouring the airport. The reliance on smart motorways as the main strategic transport routes to the airport also increases accident risk.

Because of their proximity to the airport, Charlwood and Hookwood suffer again through the preponderance of late night/early-morning flights. With many Gatwick workers living in the parish, the noise from vehicles ferrying employees to their workplace – alongside the passenger vehicles heading for the early flights – creates noise and disruption in our community that others do not have to suffer. Sleeping patterns are disturbed. Many people complain that once woken at 4 or 5am, they can not then get back to sleep. Mental health is impacted; family life suffers. That has been the situation for more years than we care to remember and it is just not acceptable to add to it with additional noise, emissions and traffic pressures.

The Preliminary Environmental Information report (PEIR) states that night-time traffic flows are unlikely to result in significant effects. Evidence needs to be provided to support this statement and suitable modelling/sensitivity analysis should be carried out.

Whilst Gatwick states that the construction phase will follow the guidelines of the Code of Construction Practice (Appendix 5.3.1) the details are not known until negotiated with the local authorities. However the construction phases are proposed to involve round-the-clock work for the first five years (2024-2029) with a further period of up to ten years of significant works thereafter. The code will provide restrictions and approved routes for construction road traffic. Anecdotal

evidence shows that, particularly with sub-contracted transport companies, the adherence to these routes is not properly enforced and there are limited enforcement processes available.

Thus the potential of significant HGV traffic 24 hours a day, seven days a week on unsuitable local roads is high. Equally, whilst Gatwick suggests construction workers will be encouraged to use the public transport system, it is well known that the shift nature of the work and the itinerant nature of the workforce is such that own transport is more likely to be used. This is not addressed in the transport strategy.

Gatwick says it will improve cycle parking, lockers and showers, and provide some pedestrian and cycle improvements at several locations for staff who live near the airport. Whilst useful, these proposals will benefit only a small number of people and are unlikely to encourage a significant shift in the use of active travel modes.

Increased public transport provision for airport workers must reflect their shift working patterns and the locations of anticipated homes for airport workers. Gatwick notes that it has monitored the house building programmes of 17 council areas around the airport. This must be reflected in the proposals for sufficiently frequent and early/late-running bus services beyond the current fastway routes.

Flooding Risk

The additional hardstanding required for this project whether at the airport itself or elsewhere, for instance to accommodate all the extra car park spaces, will inevitably add to a greater risk of flooding particularly for those living downstream near the River Mole.

The Mole, which runs through the airport, poses a substantial risk when water levels are high or when there is significant rainfall. Climate change is predicted to increase the frequency of flooding and the proposed changes at Gatwick add another layer of risk on top of that.

There needs to be proper consultation with local authorities as to when Gatwick should release water from their huge pools into the Mole. The volume of water in those instances is significant and carries a risk of flooding and the management of the process needs to be better.

The modelling of flooding risk should factor in the consequences of climate change. In addition, all flood mitigation measures should be fully implemented before the start of the work on infrastructure and extending the hardstanding areas so there is no additional risk of flooding in the short term.

Consultation

The Parish Council shares the concerns of other local authorities at the way GAL has consulted with stakeholders. It was shocking to see that Charlwood and Hookwood, villages where some properties are directly under flight paths and the entire parish is likely to be affected more than any other by ground noise, air noise and all the harmful environmental impacts, had not been included initially as a location for either a Mobile Project Office or a Deposit Point – two important elements in making householders aware of what is planned. Only through a protest from this Parish Council were those facilities provided.

The Mobile Project Office proved to be a poor vehicle for explaining Gatwick's plans compared to a public exhibition for such a significant airport expansion envisaged. Staffed by a single Agency worker who was unable to answer any questions herself, the plan apparently was for her to arrange a call-back with the management team to answer detailed and technical questions. That was the process one of our Councillors wanted to follow but no call-back ever arrived.

It was also hugely disappointing that GAL were not prepared to come out in person to meet parishioners face-to-face, to address their concerns and give a full explanation of what was proposed, particularly given the complex nature of the proposals. They organised a briefing via Zoom for Councillors only, thus ignoring the residents, but it was all over in an hour and was less than satisfactory. We believe it was crucial that, as the nearest neighbour with most to lose, residents should have had the opportunity to put questions directly to the management team.

Compensation Measures

It hardly needs repeating that Charlwood Parish Council totally opposes Gatwick's expansion plans and, as the community living closest to the Airport, we ask that our concerns be given suitable weight.

Should permission be granted to bring the Emergency Runway into regular use, we would want to see a number of measures brought in to limit the devastation that would be inflicted on our community and to provide something in the way of compensation.

There is significant concern regarding the lack of financial support for local authorities and the communities affected. As part of its second runway proposal to the Airports Commission, GAL offered a significant package of financial measures totalling circa £74m to local authorities to deliver essential community infrastructure.

This package included a Home Owners Support Scheme and Local Highway Development Fund but this time very few mitigation measures for the local authorities and communities adversely affected have been mentioned.

Conditions to be imposed should permission be granted:

- We welcome the commitment by Gatwick Airport that there would be no night flights on the Northern Runway, but this needs to be written into a binding legal agreement.
- There should be no night flights on the main runway.
- No flights over Charlwood even by small aircraft.
- No increased use of the Povey Cross entrance to the Airport.
- No use of new runway or round the end taxiways until the bunds have been completed.
- That all the land at Brook Farm, that is proposed would be brought within the airport boundary as an environmental protection area, should be planted with trees, including evergreen trees and a legal agreement should be imposed to prevent any other use of this land for commercial purposes.
- The proposed welcome implementation of a link from the Sussex Border Path to the Museum Field area with inclusion of new access points to Charlwood village, should be included in a legal agreement.
- No construction work vehicles to be allowed to travel through the parish. Their access should only be via the motorway network.
- All spoil that results from construction work to stay on site and used for bunding purposes.
- Proper noise mitigation for households. What is proposed in the way of double glazing is totally inadequate but in any case residents want to be able to open their windows in summer. Reference to installing air vents is misguided; many houses in our historic parish are listed buildings and are unsuitable for air vents. At the very least there should be more flexible options for residents that cannot take up the ventilation option.
- A legal binding commitment that no further runway or associated development will take place at Gatwick.
- The provision of a proper public transportation system for the parish. Previous attempts to run a bus service between Charlwood and Gatwick have foundered because of poor consultation and inappropriate and unrealistic timetables.
- The creation of a special community fund to recognise that Charlwood and Hookwood have to suffer the biggest impacts because of their proximity to the airport. This fund would support for instance, but not limited to: green space projects; investment in culverts and drainage in the parish to minimise the risk of flooding; construction of footpaths linking Hookwood with Charlwood; other tree-planting and environmental schemes.

Trevor Haylett
Clerk to the Council