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Date: 15 May 2014

Dear Mr Wingate,

RE: A SECOND RUNWAY FOR GATWICK

Thank you for consulting Sevenoaks District Council on the options that Gatwick Airport Limited (GAL) has identified for a second runway at Gatwick. We note that GAL is undertaking this consultation to inform its decision on the option that it would like to pursue if the Airports Commission recommends (and Government accepts) that a second runway at Gatwick should be developed.

Sevenoaks District Council has responded to a number of different aviation-related consultations in recent years, primarily in relation to noise issues from Gatwick Airport. This includes GAL's Master Plan in 2012 (which did not propose a second runway), which the Council noted provided little in terms of strategies to reduce noise and instead gave the impression that the operator should simply seek to comply with Government restrictions. You will be aware that residents in the south of Sevenoaks District are currently overflowed by aircraft departing or, more commonly, arriving at Gatwick and that the recent London Airspace Consultation raised the possibility of more areas in the District being overflowed. SDC's key concern is that any expansion in the capacity of Gatwick airport will lead to more flights over areas of Sevenoaks District and will lead to greater disturbance of residents. Sevenoaks District also contains a number of national and regional tourist attractions, including, but not limited to, Hever Castle, Penshurst Place, Chartwell and Knole Park. The tranquillity and setting of these attractions is an important aspect of their appeal to the public and, therefore, their ability to contribute to the economy and provide jobs. Aircraft noise should be avoided, as far as possible, in these areas.

SDC is pleased that GAL has sought to consider the number of people affected by different levels of noise rather than simply producing noise contour maps. However, the increases in the number of people affected are concerning and the Council notes that the forecast noise contour maps for the three expansion options show more people in

Sevenoaks District being affected. As a result, the Council is opposed to any expansion option unless it is possible to deliver this whilst reducing noise impacts from the current levels in Sevenoaks District. Sevenoaks District Council has previously raised a number of suggestions for how the noise impacts of flights to and from Gatwick on residents in Sevenoaks District can be reduced. These include:

- Establishing a minimum height at which aircraft should be approaching Gatwick and introducing (and enforcing) strict penalties for not meeting this and related noise limits. The residual background noise level of the area without aircraft, should be used as a reference point to set noise limits for aircraft and the level at which penalties will apply.
- A significant reduction in the number of night flights, as the current level is clearly not equitable in comparison to other south east airports.
- Effective use of non-regulatory instruments such as differential landing fees to reduce night time noise further.
- Working to develop a culture amongst pilots, crews and Air Traffic Control that places noise reduction as a key consideration alongside safety.

Given that these suggestions and others have frequently been made by SDC and bodies such as Edenbridge Town Council, it is disappointing that the consultation gives no consideration to them whatsoever. The consultation document states that GAL is committed to working with the Government, airlines and Air Traffic Control to do everything it can to reduce noise levels. However, it appears to Sevenoaks District Council that the only noise related proposals focus on mitigation rather than reduction. Given the high thresholds suggested for the mitigation proposals, these are unlikely to be of any benefit to residents in Sevenoaks District. SDC believes that GAL should be more proactive in identifying noise reduction measures and should respond to the suggestions made by local communities and organisations, if it wishes to establish constructive engagement with these groups on options for airport development.

As in the Gatwick Airport Master Plan, GAL suggests that the increased noise levels and area affected that will result from increased flights may be off set by newer, quieter aircraft being used in future years. Aircraft are expensive and airlines may be slow to buy new planes, which would lead to older types remaining in service longer than the plan expects. Notwithstanding this, the Council believes that improvements in technology should deliver a reduction on existing levels rather than being relied upon to mitigate the impact of increased numbers of flights.

As you will know, Sevenoaks District Council recently asked to become a member of the Gatwick Airport Consultative Committee (GATCOM). Disappointingly, this was rejected. Local feeling is that GATCOM is not effective and does not adequately consider the views of rural communities affected by aircraft noise from Gatwick. Unless Airport Consultative Committees are representative and have powers to challenge airport operators it is difficult to see how they can play a stronger role. Whilst this is primarily an issue for Government to consider, SDC encourages GAL to consider how it can strengthen the terms of reference of GATCOM to ensure that the views of local residents are given

proper consideration and that there is a complaints procedure for when residents feel that their views have not been properly considered.

The majority of people in Kent travelling to Gatwick would currently use the M25 and the M20 or M26. All of these roads pass through Sevenoaks District and are designated Air Quality Management Areas, as a result of pollution caused by traffic levels and congestion. It is vital that any growth in passenger numbers at Gatwick is supported by improved public transport links between the airport and Kent to reduce the negative impact that growth will have on congestion on the motorway network and the risk of increasing numbers of motorists using unsuitable local roads.

The consultation document states that the 2nd runway proposals are supported by planned improvements to connections with Kent. However, no details are provided on what this planned improvement constitutes. GAL's longstanding support for re-instatement of rail services between Gatwick and Kent is welcomed. SDC supports the reinstatement of direct services between Tonbridge and Gatwick (via Edenbridge). The reinstated service should be more frequent than that previously operated and should be more effectively promoted by the train operator and Gatwick Airport. The Council has previously noted that, under the terms of the Airport's existing legal agreement, £1 million annually should be spent on public transport initiatives. SDC suggests that this should be increased significantly if a 2nd runway were to be permitted and that some of this should be used to support this improved rail link should it require subsidy.

SDC is also sceptical that the very limited strategic road improvement schemes suggested to accommodate airport expansion will be sufficient. Given the potential impact of the proposed options, SDC would have expected to see a full Transport Assessment published alongside this consultation and would have expected the Highways Agency to provide detailed comments on this.

Yours sincerely

Cllr Robert Piper
Portfolio Holder for Local Planning and Environment