

**By email only**

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Date: 30 November 2021

## **Gatwick Airport Northern Runway Pre-Application Consultation**

Thank you for consulting Sevenoaks District Council on Gatwick Airport Limited's intention to submit a development consent order application for the commercial use of the Northern runway.

### **Background**

Sevenoaks District Council (SDC) is a predominantly rural local authority situated in West Kent. SDC has responded to numerous aviation-related consultations, in particular relating to noise issues from Gatwick Airport.

The rural southern part of the district is within Gatwick's flight paths. The residents of the southern part of the district are already greatly impacted by the noise disturbance from the aircrafts when arriving and departing from Gatwick. SDC's primary concern for Gatwick's expansion aspirations is that additional flights will further exacerbate the already unacceptable noise disturbance residents' face.

Whilst noted that the aviation sector is central to support business, leisure and the economy nationally and that Gatwick is a key employer for some wards within the district, SDC has had longstanding concerns for the noise disturbance it creates and the impact on local communities and this is not outweighed by the support that these proposals would bring to the economy.

Local Ward Members at Sevenoaks District have viewed these comments and are in support of the Councils response.

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We have chosen to respond to the questions most relevant to us as a local authority.

Please see our consultation response as below:

**Q1. Northern Runway proposals: overall**

*To what extent do you support or oppose our proposals to bring the existing Northern Runway into routine use?*

Strongly oppose

*Please explain your views*

SDC opposes to Gatwick's expansion as this would have substantial and unacceptable noise consequences for local communities. Whilst it is encouraging no additional flight paths are proposed, the residents of the southern part of the district already experience adverse disturbance from aircraft noise. It is proposed that expansion would result in an increase of 35% aircraft movements and 70% passengers, which would further exacerbate the noise disturbance local communities endure.

It must be reiterated that rural areas surrounding Gatwick have a quieter surrounding baseline noise which makes aircraft noise more intrusive to residents. More specifically, the difference between ambient noise and the peak level when being overflown is greater than that experienced in urban areas. Furthermore, by virtue of the low background levels, the approach and subsequent withdrawal of an aircraft, through some of our District can be heard for a much longer period of time than in built up areas. In particular, aircraft noise disturbance is more acute during the late night time to early morning period disrupting residents ability to get a meaningful duration of respite. A prolonged lack of sleep has been associated with risk of serious medical conditions including obesity and coronary heart disease, and also depression and anxiety. SDC are concerned for the physical and mental wellbeing of its residents which would further be negatively impacted by additional aircraft noise disturbance.

Sevenoaks District also has national and regional tourist attractions, including, but not limited to, Hever Castle, Penshurst Place, Chartwell and Knole Park. The tranquil settings of these attractions are a vital aspect of their appeal to the public and consequently, their ability to contribute to the local economy and provide jobs.

Sevenoaks District is situated within a network of strategic roads including the M25, M20, A21 and A25. An increase of passengers is expected to result in an increase of passengers travelling to Gatwick by car by 40% which would result in additional traffic on the motorway and strategic road network, particularly during peak hours. The M25 is already strained and severely congested. Additional capacity will cause further congestion and air quality problems exacerbating this on the local roads and in town centres. The proposed transport provisions do not improve accessibility to Gatwick from Sevenoaks and so our strategic road network will be further strained without any mitigating transport improvements.

It is noted that Gatwick provides employment to some of Sevenoaks District residents but it is not considered that the district receives much direct economic benefit from Gatwick despite its relatively close proximity to the airport. This is partially due to the poor transport links making the majority of travellers reliant on the congested and strained M25. Consequently, there is very little 'spill-over' of direct economic benefits to Sevenoaks District from Gatwick. In our view, the negative impacts of Gatwick's expansion are not outweighed by direct economic benefits.

Some residents have also raised concerns as to whether Gatwick proved a need for growth at this airport. SDC would ask that this is addressed in any further communication.

To conclude, SDC oppose Gatwick's expansion plans particularly in regards to increased noise disturbance for its residents and is also concerned for increased emissions and further strain on the strategic road network without receiving any public transport benefits or significant direct economic benefit.

**Q2. Economic benefits: jobs and skills and Q3. Economic benefits: business and the economy**

*Q2. Do you think we could do anything more - or differently - to maximise local and regional employment and skills benefits?*

*Q3. Do you think we could do anything more - or differently - to maximise benefits to business and the economy?*

Pre- Covid -19 pandemic data from 2019 indicates that approximately 7,000 people in Kent were employed in aviation related jobs - with approximately 600 of them being from Sevenoaks. Any expansion is likely to follow the same employment patterns. SDC believes there is further scope for maximising employment and economy benefits for areas surrounding Gatwick outside of the immediate vicinity. SDC encourage Gatwick to improve access to the airport, in particular working with providers for public transport links, to enhance the feasibility of more regional workers.

It has been noted that some of the figures appear to be based on past studies so may not reflect what is accurate now or in the future. The consultation makes a number of assumptions that could have a significant impact on the overall cost benefit of the scheme.

The proposals to improve access are currently shown to be immediately in the vicinity and therefore would not impact on the wider community. Whilst we welcome an increase in the amount of jobs provided to Sevenoaks District, it is our view that this does not currently overcome the other significant impacts to some of our residents.

**Q4 Airport supporting facilities**

As these facilities will be located with the current boundary of the airport, this will not impact on our District and we therefore have no comments to make.

### **Q5. Landscape and ecology**

*What are your views on our landscape and ecological proposals?*

It is encouraging to see an intention to retain green spaces and to create a new habitat within the vicinity of the airport. However, SDC encourages Gatwick to work with stakeholders to propose mitigating measures on a wider scale rather than just locally. The potential impact of Gatwick's expansion would result in increased emissions for a wider area, including Sevenoaks District, from passenger journeys.

SDC are concerned for the impact on our historic landscapes from an increase of over-flight and increased road traffic. The noise from additional aircrafts may be intrusive resulting in a negative impact on the enjoyment of Sevenoaks District's historic landscapes. These are integral to the historic character of the district and to Kent in addition to being tourism attractions. The flight path also flies over Areas of Outstanding Natural Beauty, which the Government have stated should be given great weight to conserving and enhancing the landscape and scenic beauty. The pollution caused by the increase in flights and the impact that the noise would have on the tranquillity of these areas would be significant and it is our view that this has not been properly considered. These areas are valued not only by residents but also visitors.

The development will increase air pollution and noise impacts on sensitive habitats around the airport and therefore SDC has concerns regarding the impact of these proposals.

### **Q6. Land use overall**

This impact is very local and therefore Sevenoaks District Council would not want to comment on this aspect.

### **Q7. Getting to and from the airport: our approach**

*Do you think we could do things better, or differently, to ensure all passengers and staff have appropriate choices for accessing the airport?*

SDC considers that there is capacity to improve public transport journeys to Gatwick.

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. At present, to travel to Gatwick by rail a large portion of Sevenoaks Districts residents either need to travel into London or change at Tonbridge station to get a train to Redhill. Whilst some journeys are more convenient from our western side of the District, SDC is still concerned that some of the current journeys are inconvenient particularly when carrying luggage between services. It is vital that any growth in passenger numbers at Gatwick is supported by improved public transport links between the airport and Kent to alleviate the reliance on our strategic and local road network. Further to this, public transport improvements are vital to negate 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.

Gatwick's expansion plans could be used as a means to improve rail links between West Kent to Gatwick to alleviate the reliance on our strategic and local road network. 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.

It is likely that the airports proposals would lead to a steady increase in car travel which is unacceptable.

#### **Q8 Road Improvements**

These are very localised and would therefore have a negative impact on the District as an increase in vehicles and passengers would use our roads to access the airport.

It should be noted that if the expansion in the use of the airport could be limited to Active Travel then these improvements would not be required.

#### **Q9 Public and Sustainable Transport**

*What are your views on how our proposals for increasing use of public and sustainable transport apply in your area? Please specify the proposals to which your comments refer and tell us if there are other things we could do that would be relevant to your journeys.*

Whilst Sevenoaks District Council supports the aims of the project to increase the number of people using sustainable transport, encouraging passengers to use rail and encouraging staff to use more sustainable transport, SDC are concerned that little information is shown as to exactly how you will do this. Whilst you have proposed specific local projects, nothing has been shown as to how you will do this to impact the wider region.

In addition, you also propose to significantly increase the number of car parking spaces to serve the airport, which indicates that you are still providing provisions for non-sustainable transport. Increase in car use is at odds with the Government and Local Council's plans to decarbonise transport.

#### **Q10 - Construction Managing Impacts**

##### **Q11 Construction: Transport**

As this is more of a local impact, SDC will not be commenting on this.

#### **Q12. Managing and mitigating effects: climate change and carbon**

*Do you have any comments on our approach or suggestions for specific measures to be incorporated into the Action Plan?*

SDC has committed to achieving net zero carbon by 2030 and to be a "community leader" by encouraging low carbon measures across the District through education, best practice, incentives, policy and opportunities. This includes working collaboratively with Kent County Council, Parish and Town Councils, Local Interest Group and the Local Government Association. SDC are therefore significantly concerned that Gatwick's growth could result in almost 50% increase of CO<sub>2</sub>

emissions with Gatwick alone projected to generate 5.5% of all UK CO<sub>2</sub> emissions by 2038. It is however understood that the development of SAF is now underway and was trialled during COP26 for internal flights to Glasgow from LGW and we would like to understand how these kind of developments could be used as part of the Action Plan to further reduce the impact of the proposal.

The recent UN climate code red IPCC report advises that emissions need to be drastically reduced by half by 2030 to reach carbon neutrality by mid-century. The proposed increase of emissions for Gatwick's expansion is substantial which would have a considerable impact on the UK's ability to meet its carbon reduction targets. The consultation acknowledges that at present there are no established measures that Gatwick's emissions could be mitigated. In light of this, the proposed mitigations relating to the build of the proposal and measures to encourage the use of sustainable methods of travel, whilst commendable, are negligible to the wider impact of CO<sub>2</sub> emissions.

GACC have raised the issue that Gatwick has failed to assess or quantify the non greenhouse gas effects of its proposed growth.

**Q13. Managing and mitigating effects: noise envelope**

*Do you think the proposed noise envelope is:*

Inappropriate

The noise envelope proposals do not allow for a full range of noise to be captured. It is understood that Gatwick proposes the noise envelope should be reliant upon Leq 16 hour day 51dB data. This data does not consider the impact noise disturbance from increased overflights has on local communities. SDC would welcome a noise envelope to account for average noise contours at various dB levels.

SDC support the continued restriction of night flights restricting noise exposure between 11.30pm and 6:00am. However, as expressed in previous consultation responses, SDC support a ban on flights within a set time period in the entire night-time period (23:00 – 07:00) rather than just the night time quota period (23:30 – 06:00) to give residents reassurance of a duration of respite.

It is concerning that Gatwick's noise envelope proposal has not referenced the enforcement procedure if a breach took place. As expressed in this consultation response and previously submitted consultation responses, aircraft noise disturbance has a significant impact on communities. Therefore, it is of utmost importance that local communities can be assured that the correct procedures are in place, monitored, and remediated by the appropriate body should a breach occur.

**Q14. Managing and mitigating effects: noise mitigation**

*What are your views on our approach to noise mitigation? Please specify the measures to which your comments refer.*

SDC also takes the opportunity to highlight that parts of the district are not situated within the proposed new inner or outer zones, including Penshurst, Chiddingstone,

Cowden, Hever, Leigh and Edenbridge, but are significantly affected by noise disturbance. It is unsatisfactory that residents within these areas will continue to be affected by aircraft noise disturbance without being eligible for mitigation measures.

Gatwick Noise Management Board is not independent and local residents and action group consider that the noise metrics are flawed.

**Q15 Noise Consultation Process**

We have no comments

Yours sincerely,

CLlr Thornton  
Development & Conservation Portfolio Holder

