

**CAPEL PARISH COUNCIL**  
**Beare Green, Capel and Coldharbour**

**REPRESENTATIONS BY**  
**CAPEL PARISH COUNCIL**  
**IN RELATION TO A SECOND RUNWAY FOR GATWICK**

**May 2014**

## 1. INTRODUCTION

1.1 In December 2013 The Airport Commission published its Interim Report short listing possible locations for a new runway in the U.K.

1.2 The Commission shortlisted London Airport Gatwick (LAG) as a potential location for the next runway in the U.K. in its Options Consultation 2014.

1.3 The Gatwick Airports Consultation (GAL) (in Section 2) identified three runway options. The 'options 1-3' were each supported by three plans comprising:-

- a Layout Plan
- a Boundary Plan
- an Air Noise Contour Plan

In addition a Context - Environment Features Plan was also included in the Consultation Options document.

1.4 The Capel Parish Council (CPC) in the submission will make reference to the failure of GAL to identify with absolute clarity a 'None of these Options' alternative strategy. In Section D of the Response Form – Selection of runway option five (5) boxes are indicated for response. Boxes 1-3 all relate to the runway options 1-3, Box 4 to 'None of the Options and Box 5 'Don't know.' What the Response Form fails to provide is a 'No' Option Box to any expansion. This in the view of CPC is deliberate and cynical.

- 1.5 Capel Parish Council (CPC) will in its submission, refer to the failure of GAL in any of its Plans (Context and Options) to identify or have regard to the area of land to the immediate south/south east of Gatwick Airport known as 'Crawley North East Sector,' a major development area for housing and community infrastructure. This is a compelling and misleading omission as the N.E.S. development compromises any runway expansion.
- 1.6 Capel Parish Council will also refer to the extant National Air Transport (NATS) Consultation (2013), the Environmental Noise Directive (Action Plan), the proposed 'Changes to Gatwick Routes' and the proposals for 'PR-Nav.' In respect of the precision proposed in relation to more precise routing (less flexibility) no reference is made in the GAL Consultation.
- 1.7 In relation to Noise Contours, CPC will also refer to the Option Plans which neither have regard to PR-Nav nor, the extant noise contours and the flight options 'Wizard' and 'Lambourne.' The 'Wizard' implications are important to Capel as flight taking off to the west route south, south/east minimising noise impact upon the Parish and other parishes to the east (north of Gatwick).
- 1.8 While reference is made to the extant Planning Agreement (the Section 52 Agreement) which precludes the implementation of Gatwick Airport expansion, the consultation fails to consider in the context of timescales the prevailing under capacity of the airport. CPC will also add that significant capacity is provided in other locations surrounding the London conurbation (Standstead (60%), Southend (65%), Luton (55%)) and other locations within easy and sustainable access by road and rail networks.

## 2. The Capel Parish Council Context

2.1 Capel Parish comprises an area of 2280 hectares, with a population of approximately 3,500, most of whom live in the villages of Capel, Coldharbour and Beare Green. (See location plan).

2.2 The Parish is located 6 kilometres to the west of the airport boundary (runway). Capel Village being 7.5 kilometres and Beare Green 8 kilometres respectively, from the western extent of the airport runway. The locational context will not vary should any of the options be implemented.

2.3 As the villages are in an elevated position close to the Surrey Hills AONB (275mAOD) they are subject to adverse impact from aircraft westerly departures. Given the aircraft trajectory therefore when taking off from Gatwick (60mAOD) with the elevation of the land, which includes the highest point in Surrey – Leith Hill (292mAOD), it is significant in its noise and visual impact that the average height of aircraft is between 1800 feet (525m) and 2000 feet. For aircraft landing when passing over the Clock House Beacon (to the south of Capel Village) the maximum height is 2000 feet.

The location of Capel Parish is identified in **Appendix '1.'**

## 2.4 The position of Capel Parish Council is as follows:-

- (i) it objects to the expansion of Gatwick Airport through any of the Runway Options 1-3.
- (ii) It supports the development of regional hubs which provide a sustainable development, transport and economic strategy.

(iii) it supports the principle that expansion in passenger numbers can be achieved through the new 'wave' aircraft providing increased seating capacity.

2.5 In the commercial climate it is inevitable that Heathrow and Gatwick Airport will clash over proposals for a new airport hub. This was never more evident than in the Article published in the Daily Telegraph of 27<sup>th</sup> September, 2013 in which the ***“airports both pour scorn on one another’s plans to end flight congestion.”***

2.6 The representation by the CPC therefore recognises the importance of having a clear strategic approach to development expansion of airports in the interest of economy. It does not provide a positive rationale as to why GAL should be expanded in the short or medium term (before 2060). Indeed, the Consultation has little regard to anything other than 'Gatwick Airport Self Interest.'

### 3. **Gatwick Airport and the North East Sector**

3.1 London Gatwick Airport has an ongoing Section 52 Planning restriction (imposed by W.S.C.C.) which limits the implementation of any development in the immediate future. It was decided in 1979 (the date of the Planning Agreement) that no construction of a second runway at Gatwick could take place before 2019 although, land could be safeguarded for a second wide space runway after that date. A planning application could also be submitted, albeit if granted permission following a Public Inquiry the implementation date would apply.

- 3.2 Since the granting of Planning Permission (in 1979) there have been significant and material changes affecting Gatwick Airport and their proposals for expansion, not least being the decision to grant approval (by the Secretary of State) for a new neighbourhood settlement known as the North East Sector (of Crawley). This will comprise more than 3,000 dwellings, gardens, parkland, schools, playing fields, shops and employment. This new neighbourhood is located to the (immediate) south east of Gatwick Airport in a location which would be impacted upon by any new runway expansion. Quite simply, the northern boundary of N.E.S. lies adjacent to the airport.
- 3.3 Evidence was presented by West Sussex County Council, Crawley Borough Council and BAA Gatwick Airport to the Public Inquiry which considered the neighbourhood development proposals alongside that of the appellant (now developer consortium).
- 3.4 The original decision in relation to the neighbourhood development was to refuse planning permission but this was subsequently challenged by way of Judicial Review in the High Court with Outline Planning Permission being granted. In March 2014 Crawley Borough Council approved the Reserve Matters application by the Development Consortium (Taylor Wimpey, Persimmon, the Housing Corporation and Crawley Borough Council). The development has now been implemented and will deliver its first homes this year (Affordable and Market).
- 3.5 The strategy of GAL has to be considered against the background proposals for neighbourhood development which will be sensitive in a noise location. The neighbourhood proposal rightly seeks to encourage people to live, work, play and attend school within the same area. Any expansion would therefore condemn people

to live beyond the desirable limits of noise with little respite as they go about their daily lives. They would be environmentally disadvantaged.

- 3.6 Dwellings can, of course, in principle be insulated. However, to achieve a satisfactory noise environment depends upon windows and doors remaining shut. That plainly requires an unreasonable compromise as people should be able to open their windows and doors without enduring high levels of aircraft noise. Residents are therefore, entitled to enjoy their gardens without being subjected to a very high level of aircraft noise and, of course, sound insulation offers no protection outside.
- 3.7 The unpredictability of prevailing winds would also seem likely to exacerbate how annoying aircraft noise would be.
- 3.8 At the Planning Inquiry in relation to the North East Sector there was no dispute that the proposals for the expansion of Gatwick would result in exceedence of the desirability of upper noise limits and that this would impact significantly upon the projected population in excess of 5,000 people.
- 3.9 To locate a new runway in such close proximity to the new neighbourhood in the location close to homes, gardens and parkland, etc., would be undesirable with levels of noise absolutely contrary to the principles of good planning.
- 3.10 Building Bulletin 93 'Acoustic Design for Schools' has regard to acceptable noise levels (external and internal) and states ***“For new schools, 60dBL<sub>aeq</sub> should be regarded as an upper limit for use of external used (areas) for formal and informal outdoor teaching and recreation areas.”***

In locations not in close proximity to the noise source (the airport's runways) acoustic fencing could reduce noise levels to 50dB.

Those measurements would not be achieved in the event of the runway expansion.

- 3.11 In relation to areas of recreation generally, with playing fields, open spaces and areas for formal and informal recreation, absent any buffer zones due to the relationship of the neighbourhood to Gatwick there can only be one conclusion, that the runway proposals are unacceptable.
- 3.12 With planning permission now being granted and the development being implemented the consequence is that it will be contrary to the principles of good planning to allow the expansion of Gatwick Airport by the provision of a new and additional runway to the south. To grant permission would inflict unacceptable, inescapable and permanent harm on future residents.
- 3.13 In granting Planning Permission full regard was had to the Gatwick Airport expansion proposals. The implication is that its expansion (GA) will be against all of the principles of the planning. The overriding national interest is for the provision of new homes in the south-east between now and 2026. To protect the countryside and the Green Belt and to provide homes in sustainable locations where alternative options are limited has to be the priority. For airport expansion a large number of alternative options remain.
- 3.14 The real balance that is addressed therefore is one of national interests served by keeping the Gatwick options or the local interests for delivering a neighbourhood community. The sequential position must prevail. The neighbourhood development is approved and being implemented whereas the Gatwick expansion is absent of any



approved commitment. The Section 52 Agreement should not be perceived as giving any direction to future expansion, but to review airport capacities (including Gatwick).

3.15 The CPC recognises the importance of the aviation interest to the national economic interest. It would not be reasonable to exclude all the options for Gatwick, as that would not be in the national interest, but the exclusion relating to additional runway/s must prevail. What GAL have failed to identify is alternative options other than for runway expansion.

3.16 In determining the North East Sector development in the High Court the real balance of the national interest in keeping Gatwick options open verses the national and local interest for the development of the neighbourhood community was considered, the conclusion being to exclude the expansion of Gatwick.

3.17 The balance determined then, and even more significantly now, is that the national interest is in the provision of the community. This responds to the National Planning Policy Framework (NPPF) Agenda which requires the delivery of new and sustainable homes, and new and sustainable development.

3.18 It is significant in the context of Paragraph 123 of the NPPF that planning policies and decisions should:-

- (i) avoid noise from giving rise to significant adverse impacts on health and the quality of life as a result of new development (the runway expansion at Gatwick);
- (ii) identify and protect areas of tranquillity;
- (iii) sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into

account the present of air quality management (this mitigates against the runway expansion),

- 3.19 Although PPG24 (Planning and Noise) was replaced by the NPPF it does not remove the presumption relating to noise impact from a new runway on the housing development. The neighbourhood community would be subjected to undesirable and unacceptable levels of noise exceeding (the then PPG24) desirable upper limits
- 3.20 What cannot be explained is why the North East Sector Neighbourhood is not identified in any of the plans (Context and Options) by GAL.
- 3.21 The Option Layout Plans, 1A, 2A and 3A all identify the 'Manor Royal' Industrial Estate and the Noise Wall to its north. GAL therefore accept noise intrusion will impact on an industrial site. If noise precautions are required for employment areas (which generate noise), the scenario for housing is self evident.
- 3.22 GAL have been aware of Crawley Borough Council's strategy for N.E.S. GAL participated fully in the planning process leading up to the Grant of planning permission. They participated in the four week Planning Inquiry, and subsequent legal challenges. Accordingly, by excluding any reference in the Consultation documentation (text and plan) this can only be construed as being deliberate and misleading.
- 3.23 It will not be possible or feasible for any mitigation measures to be applied to facilitate runway expansions.

3.24 An extract from the GAL layout indicating the location of the neighbourhood community is attached as **Appendix 2**.

#### 4. **Air Noise Contours and PR-Nav**

4.1 Departures are particularly noisy close to the airport (Capel is 6km from the airport). Because of this they follow Noise Preferential Routes (NPRs) until they reach 4000 feet. Those NPRs were established long ago, when aircraft were fewer but noisier than now. The NPRs are wide corridors 3km (nearly 2 miles) across and planes are widely distributed within those corridors. Once they reach 4000 feet they head off towards their destination, which cause them to be even more widely distributed.

4.2 While more concentrated flight paths will facilitate more accurate aircraft navigation, the tracks will have a severe impact upon Capel Parish. The consequence of runway expansion will exacerbate what is an already unacceptable condition.

4.3 The NATS 'Airspace Consultation' did not have regard to the GAL Consultation accordingly the converse of the points set out in their Executive Summary will apply:-

- the net effect will be more noise from more aircraft
- more areas will be overflowed.

4.4 At Paragraph 3.9 it is recognised the Airports Commission outcome ***“will eventually require further changes to the airspace system.”***

The conclusion, therefore, is that in the event an additional runway is implemented at Gatwick the airspace impact will worsen and, in the case of Capel Parish, to an intolerable level.

- 4.5 The statement therefore at 3.10 that the navigation proposals ***“does not take into account, potential development of additional runways at any airport”*** is an alarming prospect.
- 4.6 It therefore leads to the inevitable question, why does the GAL Consultation make no reference to the Airspace Consultation? The answer, in the opinion of CPC, is that the inclusion further impacts upon any prospect of Gatwick Airport being expanded.
- 4.7 The London Airport Gatwick “Environmental Noise Directive 2010-2015 outlined a strategic approach to “Aircraft Noise Management.” It refers to a ‘Noise Insulation Scheme’ and to A.O.N.B’s.
- 4.8 An insulation scheme will not have any benefit to N.E.S. nor will it have any benefit to Capel Parish. As regards to the AONB (Surrey Hills/Leith Hill) the very acceptance of noise impact upon the expected tranquillity of the area is compounded by the failure to identify its topographical character.
- 4.9 The consultation includes 3No. Noise and Contour Plans. These are projections relating to the runway expansion proposals and do not consider the extant contours.
- 4.10 Plan 3C ‘Option 3 Air Noise Contour Plan’ only identifies the contours which would apply should the second runway be built.
- 4.11 Option Plans 1C and 2C show the noise contours ‘54’ and ‘57’ south of the main parish settlement villages. Plan 3C shows how the impact will prevail to the south-east of Capel Village.

4.12 The accurate and true contours show how the existing contours extend up to Beare Green (the Lambourne Route). Accordingly, the GAL Consultation should include and have regard to the existing and projected conditions.

4.13 **Appendices 3 and 4** identify (i) Lambourne and the Wizard route and (ii) the flight paths over Capel turning to the Lambourne route direction.

## 5. **The Impact of Noise on the Community**

5.1 The World Health Organisation (WHO) “Guidelines for Community Noise” apply to Capel Parish. The Guidelines state that noise levels exceeding 50dBA will cause nuisance. The noise levels proposed by GAL will, therefore, result in unacceptable conditions for the Parish.

5.2 The levels will:-

- interfere with auditory communication;
- will result in sleep disturbance effects;
- will impact upon social behaviour
- will have a critical impact on sleep;
- will impact on quiet outdoor areas, parklands and conservation areas (AONB's – PC reference)
- will impact on outdoor living areas.

## 5.3 **Conclusion**

The runway proposals of GAL will be in breach of WHO ‘Guidelines.’

## 6. **What are the alternatives for Gatwick Airport**

- 6.1
- (i) the ability to expand, improve and enhance the two terminals and their associated hubs;
  - (ii) to improve and provide enhanced rail access;
  - (iii) to accommodate new aircraft where capacity and noise levels which will not have a significant impact upon the surrounding community.
- 6.2 The present passenger capacity of Gatwick remains unfulfilled being in the order of 60% with the expectation that by 2019 (the Section 52 date) that 35% still remains. That in itself removes the imperative for expansion. Indeed, the former owners (BAA Gatwick) indicated in 2010, that in 2045 the airport would still have some spare capacity.
- 6.3 The emergence of new quieter (and larger) aircraft with increased passenger capacity, but with reduced environmental impact (use of sustainable materials in the construction of aircraft and engines) means that passenger numbers can increase without the need for runway expansion.
- 6.4 The capability of Gatwick to respond to increased passenger demand can be addressed through the expansion and upgrade of the two terminals and the implementation of new and emerging technology.
- 6.5 Industrial and employment land in proximity to Gatwick remains available to respond to the vitality of the area. Housing and facilities will be available to respond to the workforce demands (local to the airport). This will provide a positive interface between the economic and workforce demands. It will support economic and sustainable growth and the vitality of the community.

6.6 The NPPF is a material consideration in relation to the airport expansion and the development of a sustainable community. Airports are not subject to a separate national policy statement (NPPF Paragraph 33). Any plans for expansion must address the balance between the 'Government Framework for UK Aviation,' its policies for sustainable development, a balance of land uses, in particular the need for longer scale residential developments.

## 7. **The Gatwick Runway Expansion Conclusion**

7.1 The Parish Council have addressed all of the material planning considerations regarding the impact of providing an additional runway.

With the granting of planning permission for the North East Section the southern runway expansion is no longer an option and must be discounted.

7.2 The provision and expansion of regional airport hubs now provide a real alternative to meet the needs of the population for air travel. They provide a sustainable transport options. They relate to major cities and towns providing direct national and international links and they relate to major population centres.

7.3 Stanstead Airport alone has more than 60% capacity available.

7.4 Gatwick Airport has more than 40% capacity available, and in 30 years will still be well within capacity levels.

7.5 Gatwick is surrounded by Areas of Outstanding Natural Beauty which are nationally protected landscapes valued by numerous visitors for their unique flora, fauna, peace

and tranquillity. The Surrey Hills reach 1000 feet putting them 35% closer to aircraft above.

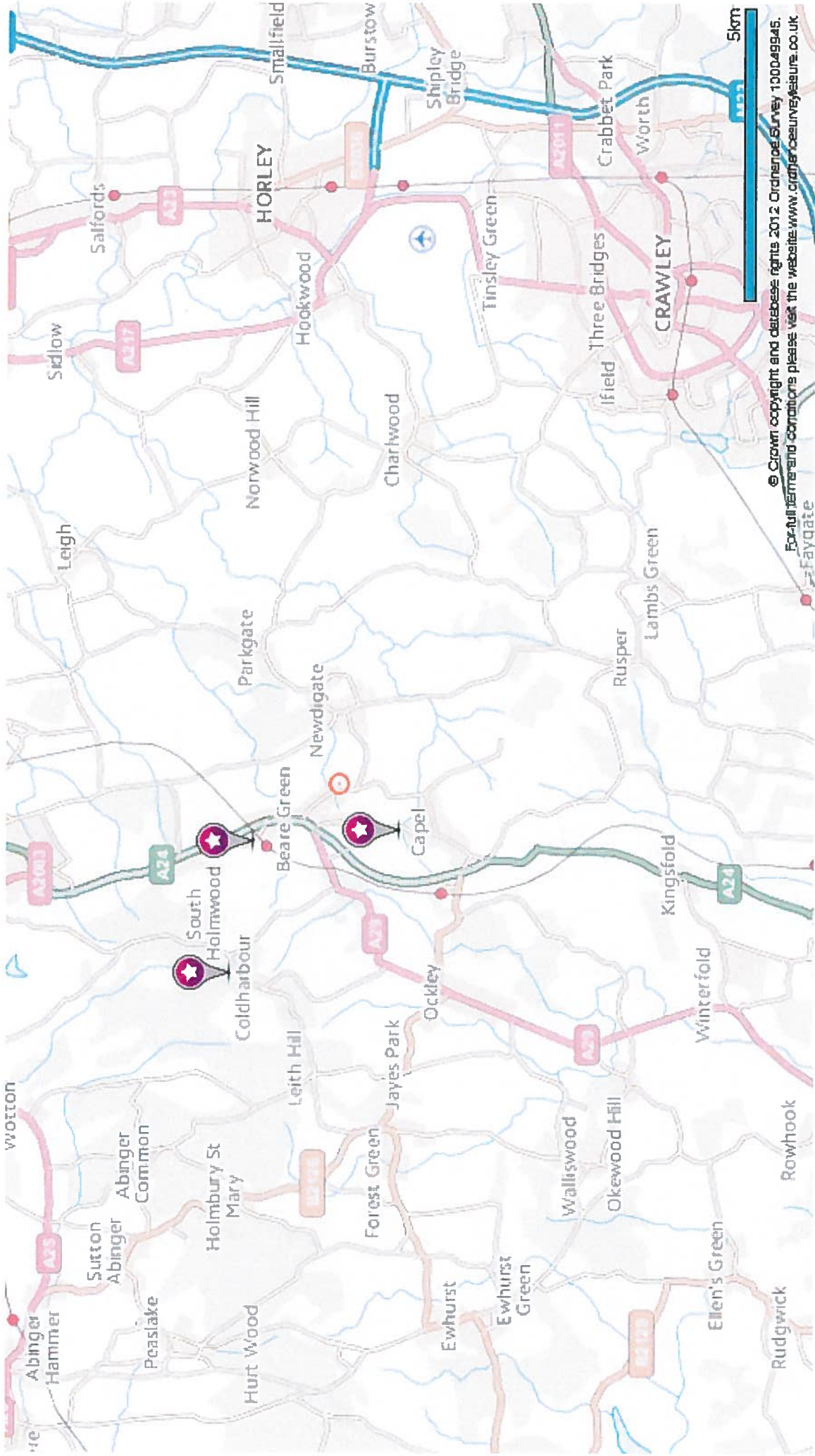
7.6 Plagued by the noise and pollution caused by aircraft taking off from Gatwick from 6 a.m. to midnight. This can and will only get considerably worse.

7.7 The expansion of Gatwick Airport is driven by commercial considerations the owners, Global Infrastructure Partners seeking permission to enhance proposals for disposal.

7.8 Capel Parish Council therefore rejects all options for runway expansion. In response to Section 'D' of the 'Response Form ' it 'ticks' none of the Options Box but consider the more accurate submission is the rejection referred to above.

In relation to Section A1 CPC is 'very concerned about all topics identified.'

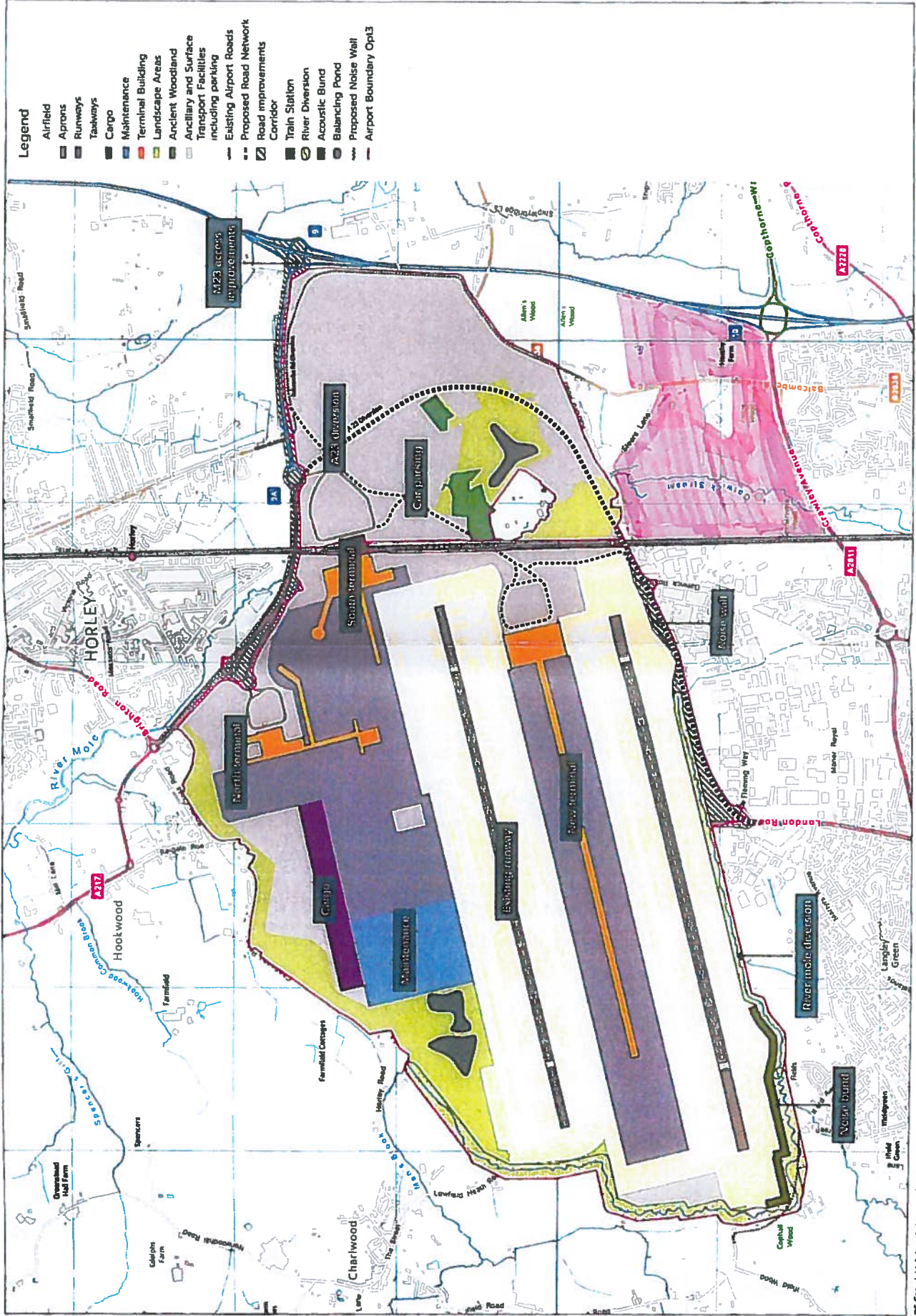




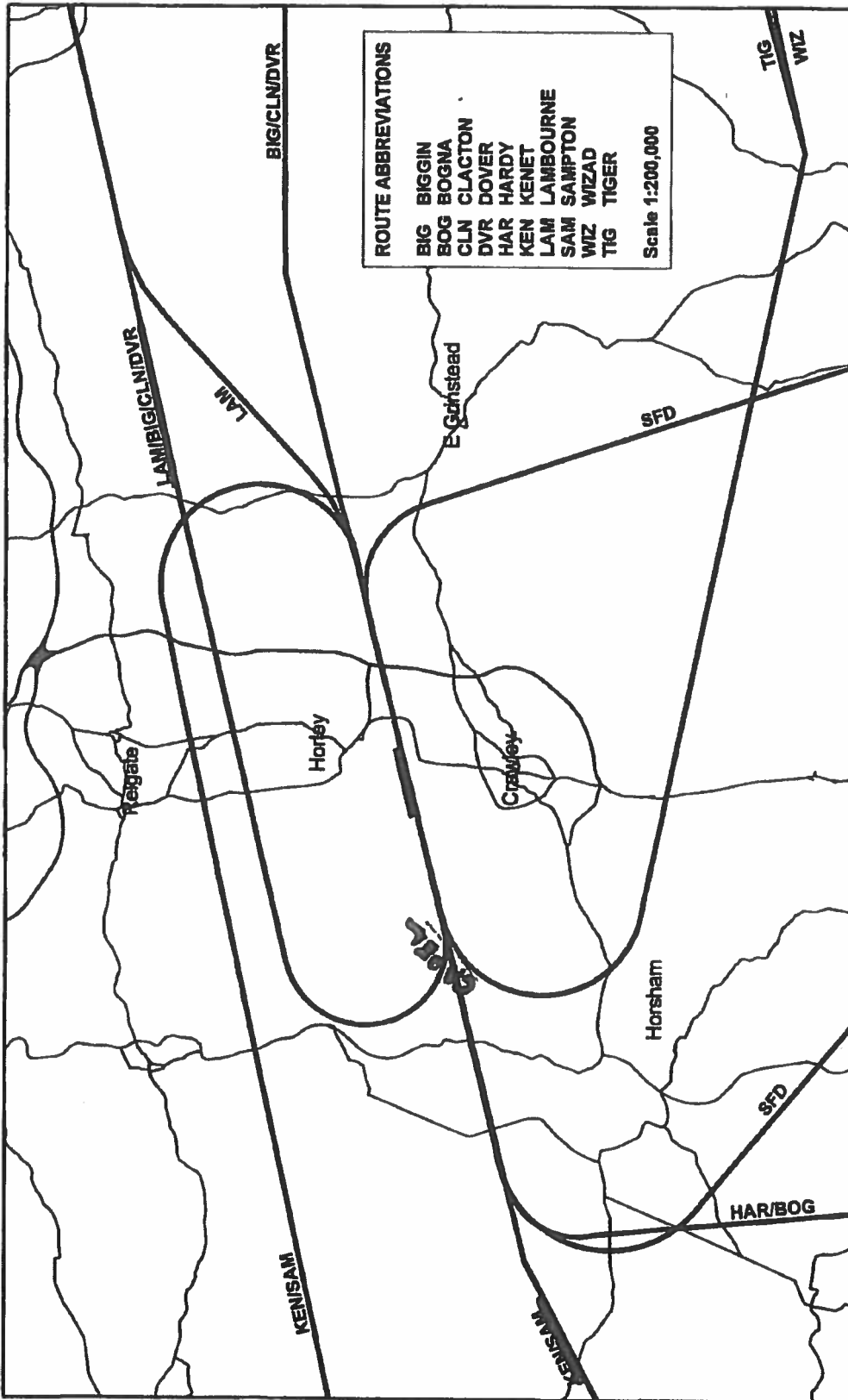
PLAN LOCAL



# Plan 3A: Option 3 Layout plan



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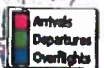
London Gatwick Airport Standard Instrument Departure Routes



Westerly departures between 03/08/08 and 10/08/08 (23:30 - 06:00)

Westerly departures between 03/08/08 and 10/08/08 (23:30 - 06:00)

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**CAPEL PARISH COUNCIL  
SAYS NO  
TO A SECOND RUNWAY  
FOR GATWICK**