

HORLEY TOWN COUNCIL

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Gatwick Airport Limited (GAL)
Northern Runway Project

By Email: feedback@gatwickfutureplans.com

30 November 2021

Dear Sir/Madam

Northern Runway Project (NRP) – Consultation Response from Horley Town Council

We refer to GAL's Northern Runway Project proposal and we welcome the opportunity to reply to this project/proposal.

Background to Horley

Horley is a town of some 22,000 people (as per the 2011 census) which has grown considerably since then and is located on the north side of Gatwick Airport with a shared boundary in places so is both indirectly and directly affected by operations and development in and around the airport site. Horley is situated within the administrative boundary of Reigate and Banstead Borough Council (RBBC).

As a commuter town situated close to London and Gatwick Airport, the airport had in the past provided good employment prospects for our residents. However, the local economy has suffered from the short-term and long-term impacts on the aviation industry from the Covid-19 pandemic in respect of job losses both directly and indirectly. We are therefore supportive of the airport re-building its business but by doing so in a way that has the least possible impact on our community and the environment, both now and in the future.

The Town Council's Planning and Development Committee thoroughly discussed the Northern Runway Project (NRP) consultation at its meetings held on 21 September, 19 October and 16 November 2021, and our response is now set out in detail below. We request that the following comments be taken into consideration as the DCO application is progressed.

We understand from the PEIR, that the NRP proposes alterations to the existing "northern runway" which, together with the lifting of the current planning restrictions on its use, would enable dual runway operations. The PEIR states that the NRP includes the development of a range of infrastructure and facilities which, with the alterations to the northern runway, would enable the airport passenger numbers and aircraft operations to increase.

Whilst we can understand that GAL wish to make one comprehensive DCO application, we would question whether items such as new hotels, office blocks etc, which are not directly related to airfield infrastructure, should fall outside of the DCO process? They must be subject to the normal procedure

for planning applications through the Local Planning Authority. You have not advanced a reason to depart from the normal processes.

We have carefully reviewed the consultation documents at length and have identified the following key issues of concern which we believe would have a significant impact on Horley, as summarised below:

- **FLOODING**
- **NOISE**
- **TRAFFIC / SURFACE ACCESS**
- **AIR QUALITY**

FLOODING:

The River Mole is located to the western side of Horley and the Burstow Stream tributary, running to the east and northern reaches of the Town. Large areas of Horley are therefore located in Flood Zones 2 and 3a & 3b (Appendix C – SFRA) and at an existing high or medium risk from flooding. Surface Water run-off caused by intense short periods of rainfall affect low lying areas around these streams, including Gatwick and Horley. Any additional development that exacerbates flooding is of great concern to the residents of Horley and Horley Town Council.

Crawley Borough Council's Level 1 Strategic Risk Assessment for the Upper Mole Catchment states that *'The provision of buffer strips is important in preserving watercourse corridors, flood flow conveyance and future watercourse maintenance and improvement. It also enables the avoidance of disturbing ecology and the structural integrity of riverbanks'*.

The SFRA states that *'Developers should:*

- *Not build within 12m from the edge of bank of any Ordinary Watercourse within the district*
- *Not build within 8m from the edge of bank of any Main River within the District in accordance with the Environment Permitting Regulations (2016)*
- *Seek opportunities on a site-by-site basis to increase these buffer distances to 'make space for water,' allowing additional capacity to accommodate climate change'.*

Both the River Mole and Gatwick Stream pass close to Gatwick and with GAL's proposals to build on more land around the current Gatwick area, this means that there are fewer buffer strips available.

It is considered that there would be impacts on a range of aspects of the water environment during the initial construction phase and we have noted the mitigation measures proposed in the PEIR. However, the conclusion that *'the magnitude of impact on health and wellbeing is considered to be negligible'* would appear dismissive of local residents' consideration of the project in respect of flooding when the reality of previous flood occurrences within the area did make a significant impact on the health and wellbeing of many Horley residents. There is also no consideration of the environmental and ecological short, medium and long term impacts.

We note that the PEIR [Ref FRA Appendix 11.9.1 – Figure 11.6] shows two new attenuation ponds by the Longbridge Roundabout, taking surface water off the highway into the holding ponds before draining into the River Mole channel. One of the proposed attenuation ponds is at Church Meadows, currently a popular amenity space used by local residents.

Church Meadows is identified on the Reigate and Banstead Borough Council Proposals Map as falling within the Church Road Conservation Area, is designated urban open space, and forms part of the

Riverside Green Chain. Church Meadows is currently maintained by Horley Town Council on behalf of Reigate and Banstead Borough Council.

Both proposed attenuation ponds at the Longbridge Roundabout appear to accept highway run off as a result of the re-design of this roundabout. The relatively small re-design of the highway to necessitate two new attenuation ponds would appear excessive and thus the re-design appears to be fundamentally flawed.

Currently there are no balancing ponds in this area. Horley Town Council and its residents have deep concerns about the loss of this valuable amenity space for residents, visitors and wildlife. We trust that any ongoing maintenance costs and responsibility for ensuring effective functionality of the attenuation ponds in the event of a significant rainfall event will rest with GAL in perpetuity but confirmation of this should be provided in the DCO.

We note in Chapter 11 of the PEIR (para 11.5.1) that *'the design of proposed flood mitigation measures is subject to discussion with the LLFA and/or the Environment Agency. Therefore, details regarding their location and arrangements are subject to change'*. The location and extent of the attenuation ponds at Church Meadows must be reconsidered and relocated in order to ensure the retention of valuable public amenity space – perhaps only one pond would be sufficient on the Gatwick dairy farmland?

We also note that a further attenuation pond is proposed on the land to the north of the South Terminal flyover (currently identified as Site Allocation HOR9 in Reigate and Banstead Borough Council Local Plan for Horley Strategic Business Park) [Ref FRA Appendix 11.9.1 – Figure 11.4]. The same site is also identified in the GAL proposals for use as a construction compound for the duration of the project.

We note that this would therefore have future implications for the delivery of the strategic site allocation in both the short term (i.e. any time before 2032 due to its use during the construction period) and in the long term, in respect of the siting of the attenuation pond potentially compromising the comprehensive redevelopment of this strategic site as set out in adopted policy.

Sewage/ Wastewater

We understand that the existing airport facilities currently discharge foul wastewater and sewage between two discrete systems, one discharging to Thames Water's Crawley sewage treatment works and the other into Thames Water's Horley sewage treatment works approximately 6 km to the north of the airport via the trunk sewerage system. We raise concerns that the level of increase in passenger capacity generated by the proposals would push the Horley Sewage Treatment Works over capacity (if it is not already) – particularly as we have raised recent concerns with the Environment Agency (EA) regarding the current leak from the Horley sewage works, near the new Westvale Park development.

We understand from the PEIR that *'Thames Water will complete an assessment of the impact of an increase in passenger numbers as a result of the Project on water treatment capacity at Crawley and Horley that would inform the ES'*, but that this has yet to be undertaken. HTC are keen to see that such an assessment is undertaken prior to the submission of the DCO application to properly inform a realistic solution.

We are supportive that the GAL proposals have sought to identify a potential location for a new treatment works (near the existing Crawley Sewage Treatment Works), should there be insufficient capacity.

NOISE:

In relation to aircraft noise, Horley Town Council is protected by regulation in the AIP that aircraft departing from Gatwick must not overfly the town. Our southern neighbourhoods are likely to be the most affected by arrivals on westerly operations and departures on easterly operations but neither fly directly overhead. A major new residential development in Horley has been built under one of the NPR's and is not protected by the current AIP regulations.

We note that the PEIR states *'The Project includes 8 new exit/entrance taxiways, plus the end around taxiways and has been designed so that the numbers of go-arounds do not significantly increase. As such, noise disturbance from go-arounds is not expected to increase'*. Whilst this might be true for arriving aircraft to exit the runway with more options, these will have no impact on departing aircraft which are slow to roll.

The noise modelling Lmax Contours shown in the PEIR at Section 14.4.54 assumes aircraft would fly along already used flight paths, however, it is noted in Figure 8.1 of the Consultation Overview Document that different areas are overflowed from the proposed northern runway. It is therefore unclear whether there is to be a change in flight paths off the northern runway. Notwithstanding the inconsistency highlighted, assuming flight paths to and from the main runway would not be affected, only departures would routinely use the northern runway (other than during maintenance of the main runway when arrivals and departures may use it as is the case now). These would fly straight ahead until they turn onto the relevant Standard Instrument Departure (SID) Route within the Noise Preferential Route generally 5 to 16 km from the end of the runway. These flight paths would be 210 metres north of the equivalent flight paths from the main runway. Thus, areas to the north of the existing extended runway centreline, to the east and to the west of the airport up to about 5 to 16 km from the runway ends, would experience more aircraft closer to them every day. The changes in noise from individual aircraft taking off on the northern runway compared to the main runway have been illustrated using Lmax 60 dB contours. This acknowledges that residential areas in south Horley would suffer an increase noise & possible annoyance, which is of major concern to HTC and its residents.

Experience from complaints received by the airport in 2019 indicated that the main cause of annoyance was not an individual aircraft event but the continuous noise from an increase in movements. Therefore increasing the number of flights proposed under the DCO has the potential for a massive increase in annoyance to residents and the number of complaints lodged with GAL.

The SOAEL (Significant Observed Adverse Effect Levels) values are below the current N65 day & N60 night metrics. We note the values set out in Table 14.4.4 (restated below) but HTC question whether GAL should model contours based on the proposed SOAEL's.

Table 14.4.4

Issue	LOAEL	SOAEL
Day	Leq, 16 hour day 51db	Leq, 16 hour day 63db
Night	Leq, 8 hour night 45db	Leq, 8 hour night 55db

We are also concerned about the noise impacts to residents living in Horley South (including the Gardens Estate and Riverside) during the construction period. The GAL proposals estimate 13 phases of construction over 12 years between 2024 – 2035 & another period between 2036 & 2038. The GAL proposals (PEIR Section 17.9.10) conclude that one property in Horley could experience noise levels above the Significant Observed Adverse Effect Level (SOAEL) during the daytime; nine properties in

Horley could experience noise levels above the SOAEL during the evening; and 120 properties could experience noise levels above the SOAEL during the night-time period (91 in Horley) [although we note some inconsistency in the figures reported in various chapters of the PEIR]. Therefore, despite mitigation being proposed, a significant number of residents will be impacted over a decade and subject to construction noise 24/7.

We would concur with the findings that *'Horley has the highest potential for adverse changes in noise exposure due to night works required for the highway alterations'* (PEIR 17.9.62) and whilst it is acknowledged that the proposed mitigation measures reduce the number of households affected the significance of the effects is stated as 'moderate adverse' which we do not consider to be acceptable in the overall balance.

The Consultation Overview document (page 137 section 137) states that there will be *'Potential adverse impact to Riverside Garden Park & residential area'*. Furthermore, Page 138 sections 49-51 state that *'night-time impacts may be significant on health & quality of life'*. We note that the consultation documents indicate that noise insulation schemes may be necessary with option of temporary re-housing of residents. However, the documentation provides no suggestions on the type & quality of the temporary accommodation, how long for & who will pay for this and associated removal costs, and whether there is a difference between homeowners and tenants. We have concerns regarding this level of mitigation, particularly regarding the "temporary" nature of any rehousing. As the project is likely to take in excess of 10 years to complete, it is questionable as to whether it can realistically be considered a "temporary situation".

We note that a new noise bund along the A23 boundary with Riverside Garden Park is proposed, however, this will entail the loss of some of this existing high quality valuable community open space, not to mention the loss of mature tree screening along the existing A23 impacting on the character and visual appearance of the park. Whilst the loss of this land is proposed to be mitigated by proposing an area of land the other side of the airport spur which is currently an airport car park, we do not consider this substituted land as being of comparable quality and locationally suitable compared to what would be lost.

Furthermore, noise mitigation in this area is proposed to be 2 metres high which seems totally inadequate when looking at the height of the noise bunds at the western end of the airport.

The PEIR (Section 17.2.10) states that *'the government seeks to strike a balance between the negative impacts of noise, such as on health and wellbeing, and the positive economic impacts of aviation. A general principle is to ensure that benefits from future growth are shared between the aviation industry and local communities. As such, the industry should continue to reduce and mitigate noise as airport capacity grows, with the government's policy on aviation noise consistent with agreed international approaches and relevant European laws'*. We consider that, to date, benefits have not been shared with the local community, as the noise contours have not significantly reduced over time with the introduction of quieter aircraft. Whilst this could change with the increasing number of NEO's & MAX's in the airline fleets operating from Gatwick, we still remain very concerned.

TRAFFIC / SURFACE ACCESS:

The GAL development proposes a Construction Code of Practice which we support. However, we are sceptical that the requirement for construction traffic to use the M23 can be successfully controlled. In particular, any construction traffic using the proposed construction compound along the Balcombe Road as there is currently no access to the south terminal/ M23 spur Road nor is one proposed. It is

not clear how GAL propose to manage construction staff traffic not adding to the pressure on local roads particularly in the Horley area surrounding the airport?

Whilst we welcome the long-term objective of the proposed road alterations which seek to separate airport traffic from local road traffic, we are concerned about the phasing of these works and the visual/ noise impact of the proposed alterations to the A23/ M23 spur on the residents living in the Horley Gardens Estate, given the significant removal of vegetation.

We are alarmed to read that the phasing of new road infrastructure is scheduled towards the end of the NRP's proposed timeline (i.e. after the increase in passenger numbers). This is unacceptable to Horley Town Council as the existing road network is unlikely to have sufficient capacity to cope with the additional traffic. We would advocate for trigger points, based upon passenger numbers which will require certain new infrastructure to be in place and ask that this be given due consideration.

We note that the M23 Spur Bridge over the Balcombe Road is likely to require substantial works to facilitate the proposed access improvements. However, limited information has been provided to determine what impact that could have on the free flow of traffic along the Balcombe Road, an important route for residents into and out of Horley. HTC seek clarification on the duration of any works needed and any potential diversion routes, alongside the phasing of these works in relation to the wider construction phasing.

We note that most of the traffic flows calculated in the PEIR (Appendix 12.9.2) seem to be those in West Sussex, however, the majority of road traffic to Gatwick will at some point on their journey travel through Surrey and we request that Surrey roads (including the A217/A23) are included.

Furthermore, we would question what the impact would be if the Government (DfT) seek to return smart motorways to their original configuration (i.e. re-instatement of the hard shoulder) for Gatwick's surface access calculations?

We have also been advised that the planned funding for major rail infrastructure improvements in the Croydon area (e.g. Windmill Junction) has been re-assigned and there is no indication when funding might be available in the future. This will mean the current Brighton Main Line will have to cope with a massive increase in demand from passengers [as forecast by GAL] and staff on the airports only rail link to the capital.

AIR QUALITY:

The Horley AQMA includes an area of the southwest of Horley to the north of the airport, including Riverside Garden Park. The AQMA was designated for exceedances of the annual mean NO₂ air quality standard.

Whilst the PEIR would suggest that air quality will remain comparable to baseline levels, vehicle emissions across the UK are improving due to improvements in technology which has seen air quality dramatically improved – for example, we understand that air quality in Hooley, to the north of the borough (almost entirely caused by vehicles previously) has dramatically improved in the last couple of years. We feel it is unfair for Horley residents not to benefit from the improvements in air quality being enjoyed by almost all other parts of the UK as a result of these proposals which are merely seeking to keep air quality at or around existing baseline levels.

We understand that at the time of writing the PEIR, no specific emission factors are available to allow quantitative assessment of ultrafine particles. While currently there are no regulations controlling

ultra-fine emissions, there is growing concern that they are dangerous. We recognise that aircraft are a key source of ultra-fine particles and we understand that there are currently areas of Horley near the airport that have ultra-fine particulate levels in the air comparable to that seen in central London. We therefore consider that an assessment on ultra-fine particles should be included in the revised ES as part of the DCO application having regard to any emerging policy and legislative change in this regard.

We understand that the WHO published revised guidance on air pollution in September 2021, which recommends a reduction in annual average nitrogen dioxide concentration to 10ug/m³. Given that levels around the airport are anticipated to be significantly above this level, we request that GAL undertake further assessment and mitigation to address the revised WHO guideline value, particularly in light of the Government's commitments at the recent COP26.

Other Matters – Climate Change

At its Full Council meeting held on 10 December 2019 Horley Town Council declared a [Climate Emergency](#) that requires urgent action.

The recent COP26 Meeting reaffirmed the UK's commitment to tackling climate change. The Glasgow Climate Pact '*recognizes that limiting global warming to 1.5 °C requires **rapid, deep and sustained reductions** in global greenhouse gas emissions, including reducing global carbon dioxide emissions by 45 per cent by 2030 relative to the 2010 level and to net zero around mid-century, as well as deep reductions in other greenhouse gases*' (our emphasis).

The PEIR acknowledges that the GAL proposals will result in higher overall greenhouse gas emissions, which would appear contrary to the UK Government's climate change ambitions of achieving carbon zero by 2050.

The GAL proposals appear to place significant reliance on Sustainable Aviation Fuel (SAF) and we would question how achievable this is – will a supply of SAF be in place to meet demand? Notwithstanding this, the use of SAF raises its own climate change concerns as the majority are from plant-based sources associated with the potential destruction of rain forests to create more land for crop growing alongside competing for land growing crops for human consumption.

If Gatwick's air traffic expands at the rate suggested in the PEIR, Gatwick's CO₂ emissions will contribute to a significant proportion of the Government's total aircraft CO₂ emissions for the whole of the UK. This seems contrary to the Government's "Levelling Up" Strategy whereby concentrating so much air traffic south of London could impact the economic and environmental sustainability of other UK airports, especially northern ones, if the broader Government target for aircraft CO₂ emissions is to be taken seriously.

Furthermore, it could be argued that not all CO₂ emissions are equally important or valuable - if the UK Government are serious about achieving carbon net-zero by 2050, is there a justifiable need to be generating CO₂ on non-essential short-haul flights vs. CO₂ emitted to heat homes or for food production.

Conclusions

Horley Town Council supports the build back of Gatwick Airport and associated economic benefits associated with this. We would, however, question the demand forecast for such levels of passenger

growth and whether airlines will grow back above pre-Covid levels, so thereby query the need for the Northern Runway proposals.

Under permitted rights GAL have forecast that over 62 million passengers can be accommodated by more intensive use of the main runway. This alone could be considered a significant increase over the 2019 passenger numbers.

Historically the Town Council has supported Gatwick's growth based upon a one runway/two terminal approach and this remains the case.

From the information provided as part of this DCO consultation process, we formally **object** to the proposed Northern Runway development, inter alia, on the following grounds:

- An increase in flood risk, significantly impacting the residents of Horley;
- Inappropriate flood mitigation resulting in the loss of valuable amenity space at Church Meadows;
- Insufficient level of information regarding sewage and wastewater capacity;
- Unacceptable adverse noise impacts to Horley residents from additional aircraft and construction operations;
- Insufficient level of information and inappropriate noise mitigation measures being considered;
- Concern regarding the level and routing of construction traffic having an adverse impact on the local road network;
- Insufficient level of information regarding construction phasing;
- Concern that new road infrastructure and mitigation measures are only being proposed after increases in passenger numbers;
- Air pollution from aviation, construction and operational phases adversely impacting Horley residents;
- Concern about greenhouse gas emissions and wider impacts on climate change; and
- Insufficient justification for airport expansion in light of travel pattern changes following Covid-19 and the national and international commitments on carbon reduction.

The Council re-iterates its policy and support of Gatwick continuing to grow as a two terminal and one runway airport.

Ultimately the planning balance will fall between the environmental impacts versus the economic/employment benefits of the proposed development.

We trust our comments will be taken into account as you progress your DCO application and we look forward to hearing the outcomes of the NRP consultation in due course. The Town Council would be happy to discuss any matters arising from our consultation response.

Yours faithfully



Joan Walsh
Town Clerk
Horley Town Council