

SALFORDS AND SIDLOW PARISH COUNCIL

Gatwick Airport Northern Runway Project – Additional Final comment

Salfords and Sidlow Parish Council made our original objection comment on 6 February 2024.

Salfords and Sidlow Parish Council (S&SPC) Councillors have attended and contributed to several examination sessions. S&SPC suggest that the following topics are worthy of further examination because of the potential negative effects on our residents if not fully examined and any conclusions included in the final recommendations to the Secretary of State for their decision on this DCO.

Surface Transport

Examine contribution by GW & NR on any obstacles facing GWR in increasing their Reading – Gatwick North Downs Line train services that could further remove or decrease M25 vehicle traffic and GWR's current early morning train services for passengers departing from Gatwick on early flights from 6.00am

Surface Transport; the previous examination session did not examine road transport serving the airport; this includes local bus services to and from the Airport, variants in frequency and offer of bus services in the mid to late evening for late evening/night time flight arrivals and departures, longer distance coach services and the associated handling facilities for them and local taxi services from the Airport plus negative effects on our local roads capacity if the DCO, if granted, achieves the commercial success that Gatwick expects.

Please see attached document prepared by Surrey County Council titled A23_CrossOakLane_Report_March2023_Final which shows analysis regarding traffic on the A23 in our Parish.

Noise - Aviation & Ground

We request that the proposed session to examine Noise Envelopes takes into account the current debate on Air space route changes especially Route 4 that overflies our Parish. Please see below on Route 4 matters that sets out the Route 4 position from our Parish's perspective.

Route 4

This is the outline of our (SSPC and Plane Justice) concerns about Route 4. We believe its correct route is the pre 2013 route as explained below.

In 2013 NATS published their 'Airspace Change Proposal (ACP) Gatwick PRNSAV SID replications consultation' "to implement P-NAV replications of all SID routes from Gatwick Airport's main runway. ."

The ACP outcome for Route 4 brought aircraft south of where they had been and over parts of both Salfords and Sidlow villages that were not previously overflown. A letter from then CAA Director, Mark Swan, recognises, what he calls a discrepancy, appears to have existed where the ground track doesn't correlate with the NPR centreline. He suggested one cause for this could have been 'magnetic variation changes not being incorporated over the intervening years'.

Ever since the new Route 4 was approved, S&SPC have argued this was wrong. It did not replicate the SID and it should revert to where it was prior to the NATs consultation.

We were not alone and failure to achieve this led, independently, to the formation of Plane Justice (PJ) who were supported by various residents and bodies, including S&SPC.

PJ sought to have Route 4 revert to the pre-2013 route but the CAA/Gatwick Airport refused which led to PJ applying for a Judicial Review. When consent for the Judicial Review was allowed the CAA conceded its April 2017 decision making the, by-then, Gatwick departure Route 4 permanent was wrong and it should be guashed.

PJ explained the CAA was found to be wrong to ignore existing patterns of traffic and the value of leaving the Route in its 2012 location, wrong because the failed to require Gatwick to consult on the design of the Route that was introduced in May 2016 and wrong in saying that magnetic drift was a sufficient reason to move the Route, as their quashed decision had asserted.

A Gatwick blog dated 12 July 2019 says: -

".. the CAA recently instructed Gatwick to review the conventional Standard Instrument Departures (SIDs) for Route 4 as part of the recently initiated airspace change..."

S&SPC reads this to mean that, following the Judicial Review, Gatwick was required to review the Route 4 SIDs.

The blog says, further down: -

"Given the drawn out and already complicated recent history of Route 4 departures, undertaking a further ACP at this stage would create significant confusion to local residents and stakeholders. It has taken two years to get to this point and integrating this conventional ACP into our ongoing airspace change also risks delaying the current process and has the potential to generate understandable frustration among local communities looking for a swift resolution to this matter."

"What happens now?

After careful consideration, Gatwick has decided not to carry out the requested review and to instead remain focussed on the current ACP on RNAV Standard Instrument Departures.

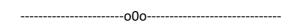
We expect that our decision not to review the conventional SIDS will allow the CAA to draw to a close the 2012 airspace change on Route 4. It would also decouple entirely the two ACPs – making the current Route 4 process more straight forward.

Following a CAA decision on this matter, we anticipate that in due course we will be required to remove the published temporary Route 4 RNAV SIDs currently in place. Airlines will continue to fly Route 4 departures but will need to produce their own flight management system coding pending the completion of the ongoing Route 4 airspace change process; it is not possible to quantify what changes to the flight path that aircraft currently follow will result and the timing of the removal will be determined by the CAA.

It remains our ambition that we can develop and implement new Route 4 RNAV Standard Instrument Departures in the first half of 2021. We believe that, in conjunction with changes enabled by airspace modernisation, Route 4 departures should create less impact on communities. Full details of all our airspace changes can be found on the CAA's airspace change portal; just enter 'Gatwick' into the search function."

The above shows Gatwick Airport chose not to "carry out the requested review" not least because this required "undertaking a further ACP" and, for the other reasons given in the blog.

We, S&SPC, have asked CAA to let us know where they believe the legal route of Route 4 is now.



Previous Comment submitted on 6 February 2024

Salfords & Sidlow Parish Council OBJECT to Gatwick Airport's application to enable dual runway operations at Gatwick Airport through altering the existing northern runway, lifting restrictions on the northern runway's use and delivering the upgrades or additional facilities and infrastructure required to increase the passenger throughput capacity of the airport. This includes substantial upgrade works to certain surface access routes which lead to the airport. The proposed works are predominantly located on the site of the existing Gatwick Airport and the sites of the existing surface access highways routes that lead to the airport. Gatwick Airport is in Crawley, West Sussex and some of the surface access infrastructure is in the county of Surrey.

Salfords & Sidlow Parish Council would be predominantly affected by the increased harm to our residents from the greater number of passenger and flight numbers leading to both larger aircraft, which the dual runway operations would make possible, and concentration of noise on our Parish. This increased harm would be from both noise and air pollution.

Gatwick aircraft affect residents of the civil parish of Salfords & Sidlow when using Route 4. Due to the prevailing winds about 2/3 of take offs are to the west with about half of these being on Route 4.

For many years aircraft on the Route 4 SID flew well north of the NPR centre line and the 2013 Airspace Change Proposal made it clear that PRNAV routes would replicate the SIDs, the legacy route. This is not what was done. While we recognise this application does not deal with changes to the Routes we are understandably concerned that Route 4 will continue to fly south of the legacy route. Most of the centreline of the straight part of Route 4 NPR, after the turn, is over our parish and that route has brought aircraft over more of the residents of Sidlow is directly over the centre of the village of Salfords.

Gatwick Airport should not benefit at the expense of increased harm to people on the ground. Any increase in flying to and from Gatwick Airport should keep to the principal that there should be no increase in the number of people affected, there should be no newly overflown people. Likewise, there should be no increase in the noise inflicted on people on the ground. With this as our principle, the Parish Council questions how there can be no new people overflown when many of the aircraft over our Parish are able to be vectored at 4000 ft plus so this is not in control of Gatwick or this DCO application. This in turn means that Councillors cannot understand how Gatwick Airport can state they will be remaining at guaranteed current noise levels when they don't have any current legal requirements in place over the parish. This means that neither of these can be guaranteed - assurances may be given but cannot be relied on which is unacceptable.

Gatwick established a Noise Management Board expressly recognising the need and indeed requirement for the current aircraft configuration to significant reduce the negative impact on those overflown and nearby. Gatwick has worked hard with airlines and relevant bodies for six years and has achieved very little in noise reduction. In a conversation recently they advised us that aircraft had become 30% less noisy over the last 30 years due to technological advances. Gatwick now asks to increase the noise levels over us with heavier bigger aircraft flying more often, a 40-50% increase in volumes, wiping out much of the benefits claimed to date. They allege that this is ok because Noise Management measures are being developed which will wipe out any incremental damage.

This is not ok; those technological advances are to reduce the current level of impact further, for residents benefits, not to simply maintain noise at todays levels. We know the advances are not certain, require extensive complex negotiations and evaluation and that any material successful advances will take a generation to implement as Gatwick, Aircraft Manufacturers, and Government Bodies have aptly demonstrated to date. Gatwick's failure to address the shortcomings of its Noise Management work, or the reasons it considered its creation essential is little short of negligent.

We believe there a direct conflict with national planning policies in ignoring Heathrow 3rd runway; the economic impact assessment is woefully overstated as a result, further it uses assumptions which have been proved discredited in overstating income, job creation and understating environmental cost. It ignores the displacement of tourism revenue being delivered freely to other countries.

The proposed additional passenger numbers have been double-counted from other airport applications in the South-East. Collectively they would require a significant north-south further shift on already heavily burdened Motorways and trunk roads, with overwhelming increase in traffic in the sky between Heathrow and Gatwick. Residents are already impacted by aircraft being depressed on Route 4, by holding patterns at Heathrow; increasingly blamed on weather and French air traffic control. Nothing proposed will do anything but compound this problem bringing a significant burden to all residents.

The Parish will also be affected by a greater amount of Gatwick parking on our local streets and cul de sacs, which already takes place on many of our roads, especially around the train station as it is a few stops from Gatwick

Salfords & Sidlow Parish Council OBJECT to Gatwick Airport's application.



Gatwick Airport



6 February 2024

Dear Sirs

Relevant Representation of Salfords and Sidlow Parish Council (registration identification No. 20044989)

Salfords and Sidlow is a civil Parish within the borough of Reigate and Banstead in Surrey. The parish occupies most of the rural area between Reigate/Redhill and Horley. Salfords village lies approximately 3 miles south of Redhill astride the A23. Sidlow Village lies to the west of Salfords, South of Reigate on the A217. The Parish Council represents a population of about 3,500 of which 2,700 are electors.

Gatwick Airport is about 3 miles south from both villages and Routes 3 and 4 fly over the Parish. We are impacted by its operations both on the ground and in the air. Many residents work locally either at the Airport or in other businesses as well as reside here. This written statement considers views raised during the last year since the application for a second runway was first issued.

The Council objects to the application due to the significant harm to our residents from increases in noise and air pollution. This comes from both the increase in passenger numbers written into the expansion proposals travelling through the parish using surface transport, and the associated increase in aircraft using the airport and flying overhead. There is little economic benefit likely to arise for are residents; we already have near full employment and there is pressure for new housing from the existing community. There's a significant further impact of the huge construction effort required for a new runway, associated infrastructure and additional road improvement schemes required. None of these are addressed adequately in the application from Gatwick Airport despite our raising these along with other councils during the "consultation" period to date. We address each of these in turn:

Surface transport Rail and Road: quantum and pollution

Gatwick acknowledges it has a congestion problem around and at the airport.

Our Parish has the A23 (London to Brighton road) passing through Salfords whilst the A217, (Sutton, via Reigate to near Gatwick where it joins the A23 to serve the Airport), passes close to the Sidlow part of our Parish and both roads, at peak times are often at a standstill so increasing journey times and disrupting good timekeeping for local buses. All too often for local comfort the



M23 is shut, usually following traffic incidents and disrupted motorway traffic then uses the A23 and A217 adding further congestion to these roads.

In the case of the A23 this added traffic often obstructs and so prevents emergency ambulances travelling to and from East Surrey Hospital Accident and Emergency department keeping to their target times for emergency patients; the Golden Hour for heart attack and stroke victims comes to mind.

From our local experience as residents, we know that our roads and trains, at peak times, are often at capacity and this application simply assumes that the existing infrastructure can cope, save for some proposed works immediately at the entrance to the airport.

It must be noted that Gatwick station has had recent capacity improvements; these include a new platform plus re-modelling/enlargement of the station buildings at airport level plus the fitting of additional lifts and escalators to link platforms with the airport level part of the station.

All these are designed to speed up passenger movement through the station plus to and from the airport. These station improvements should encourage aviation customers to use rail for their journeys to and from the Airport.

Ideally the Airport should be encouraging airlines to sell tickets with rail travel, at advantageous prices, included. Sceptics might think that the Airport would prefer aviation passengers to travel by car to financially benefit from the car parks fees income.

Rail

Capacity may be divided into track capacity i.e., how many trains each hour can be provided along a specific route and the passenger capacity of individual trains. This will depend on the capacity of the rolling stock used and its configuration for airport services noting the tensions of seating layout for comfort version numbers carried and seats removed to provide luggage space. An example of this passenger numbers carried vs luggage space are the three carriage diesel units used by GWR on their Reading – Gatwick Airport services.

There are plans to complete electrification of the North Downs line but, apparently the Rail Safety and Standards Board is anti 3rd rail electrification quoting the Electricity at Work Act as the basis of its safety concerns.

Network Rail has said, as part of its Croydon Area Remodelling scheme – CARS – that the Croydon area is the busiest, most congested and most complex part of the country's rail network. The lack of capacity at East Croydon station and the complex series of junctions north of Croydon, the Selhurst triangle, delays trains across the Brighton Main Line and the wider network every time an incident occurs. It also means that journey times will always be constrained, and we won't be able to run the additional trains needed to meet passenger demand or serve new destinations, in the future.

Network Rail has, as part of its CARS work already identified 'pinch points' or 'bottlenecks' in the tracks that serve the airport and has published plans on ways to remedy these but, to date, there is no Government funding to let Network Rail execute these works following the Government's 2020 Spending Review. The identified pinch points are East Croydon station where the need for an extra platform has been identified, the nearby Selhurst junction and Norwood Junction Station. Selhurst junction is where trains from East and West Croydon stations are routed towards London terminals, specifically Victoria and London Bridge plus Thameslink trains travelling via London Bridge towards Bedford, Cambridge and Peterborough and providing links at St. Pancras with Eurostar services.

Other potential pinch points are at Purley Station where trains to and from the Caterham and Tottenham Corner branches join and leave the Brighton Main Line. Stoats Nest junction near



Coulsdon allows trains to move between the fast Quarry Route and slow Redhill Route lines. Pre-COVID Networks Rail signallers were handling four Gatwick Express trains each hour to and from the Airport and London Victoria through these bottlenecks.

More recently Network Rail has found a track path for a 2nd Reading - Gatwick Airport service via Redhill and are working on finding further track paths for trains to and from Tonbridge, Kent and Gatwick and again via Redhill.

We invite the Inspectors to discuss with Gatwick their assumptions for modelling the increase in Rail passengers and the associated knock-on to their assumptions on road use.

Roads

Our residents already experience an impact on roads and trains serving our Parish, from Gatwick activities. The airport management has been working to reduce emissions on their property by increasing drop off and parking charges. This has had an impact seen on the residential roads of our Parish in increased parking of vehicles particularly around Salford's train station, and passengers then travelling into the airport by train/bus saving themselves money but clogging up residential roads around the Parish and so increasing the pressure on the road network. Whilst emissions may have reduced at the airport, they have obviously increased around the airport locally. Gatwick increased drop off charges by 20% only a few weeks ago.

We therefore invite the inspectors to obtain accurate evidence to show how this increase has affected traffic overall: we believe this simply continues the move of vehicles to the wider area, increasing pollution in the surrounding parishes.

Buses

Gatwick South terminal is well served by public transport buses during the working day and early evening, typically 24 – 25 buses each hour serves this terminal in each direction. However, the mid to late evening position is less good with some routes to Epsom, Sutton and Caterham ceasing to run and on other routes buses are less frequent often moving to an hourly frequency. But Metrobus do operate a few 24-hour all-day services presumably funded by the Airport.

This bus company works to commercial principles so routes with low patronage are not operated. Not a solid encouragement to get people out of their cars.

Gatwick has during the consultation for the application reduced the estimate of passengers using train transport to 55%, leaving 45% confirmed as road users. The M23 is one of the country's busiest motorways with 180,000 people recorded as using it daily before the implementation of smart motorways in 2020. Regular breakdowns result in traffic using the A23 and A217 through the Parish as main diversionary routes. This has effects on our residents, and local traffic levels. Traffic is already heavy on these roads on non-motorway closure days.

It is vital that this traffic on this road stays moving given that the nearest major hospital the East Surrey is in Redhill, just north of our Parish. Even now, there are occasions when ambulances get caught up in heavy or stationary traffic on this trunk road.

We are not aware of any proposals to restrict any additional traffic and we invite the inspectors to seek evidence that pricing restrictions at the airport will mitigate the impact of the additional traffic on our Parish.

We are advised that the application assess the impacts using a "future baseline" of movements, which distorts the future impact from the current numbers seen annually where Gatwick is



operating back at 2019 levels 0— we invite the inspectors to ask Gatwick for an assessment of the impacts using 2023 data to see if their assumptions hold up.

The application assumes an increase in cargo transport carrying over 220,000 tonnes: the equivalent of over 8,000 three axle lorries, using local roads with no calculation of the impact on air quality.

We invite the inspectors to discuss the impact of the additional freight given the lack of capacity to onward transport it on the railway network.

Construction traffic

Construction traffic brings its own problems; this was recognised, for the building of the M25 by using a railhead at Merstham to bring in heavy aggregate style materials.

We are not aware of Gatwick considering such a proposal even with the Brighton Line railway passing nearby and extensive sidings located south of the station where freight traffic could be stabled for unloading new materials and the removal of bulk waste from the site.

Transport Secretary, Mark Harper, said in his December 2023 statement of encouraging more freight by rail that for example, just one train can replace up to 129 heavy goods vehicles (HGVs) and a tonne of freight moved by rail produces about a quarter of the carbon emissions it does by road.

Please could the Planning Inspectors seek clarity as to how such traffic can be minimised, or roads returned to their previous conditions, plus assessing how residents will be impacted during the construction period. We echo the concerns of Horley Town Council and Reigate and Banstead Borough Council in this matter.

Aircraft noise; general

Gatwick has recognised the detrimental impact of noise of the aircraft on the surrounding Parishes and has worked closely with the Noise Management Board (NMB) to reduce this since 2016, but with relatively small impact in that timeframe. The recent NMB review concluded that workplan initiatives don't align with a three-year term... i.e. that any small tweak to reduce noise requires significant engagement, testing, and a review process which includes various government agencies. It can have an impact, just not quickly. Significant reductions in noise have come from manufacturers making changes to engines and airframes. Since 2000, improvements have according to the CAA been incremental at best. Improvements currently resulting from the final replacements of older aircraft with the current range of quieter aircraft are stated by the industry to be at the rate of 0.1-0.2 decibels per annum... or taking 15-30 years to achieve a perceptible reduction of only 3 decibels per aircraft.

This is particularly of importance to the northern side of Gatwick operations, including our Parish, where the sky is crowded with aircraft from Heathrow as well as Gatwick at less than 10,000 ft. Heathrow traffic regularly results in aircraft flying route 4 through the Parish being kept to lower altitudes, rather than continuously climbing, thus having a much louder impact than the Gatwick data in isolation would present. This noise impact is probably best assessed in Sidlow on the corner of the route 4 turn where residents get the increased impact of the accelerating departures from the runway, the turn and the exit from the turn.

We invite the Inspectors to add Sidlow to its list of site inspections preferably once the



Gatwick summer season has commenced to understand the impact over the rural community which has little surface noise competing and therefore accelerating aircraft have a greater impact.

The application argues that manufacturers will introduce quieter aircraft. This indeed has been Gatwick's position with the Noise Management Board to result in reduced noise in the future, based on the current flights. Gatwick suggests in the application that this will allow them to significantly increase the number of flights a day without impacting residents. These two goals are incompatible: increasing flights increases noise overall even with slightly quieter planes. The manufacturers goals of reducing the noise emissions for residents will be completely subsumed by the increase in flight numbers. The reductions in noise from aircraft cannot be guaranteed by Gatwick, as the manufacturers are not under their control yet it forms a core plank of its assertion on noise. We invite the inspectors to investigate the basis on which this assertion can be relied upon. A reasonable outcome would be that residents should see a reduction in noise year on year regardless of any increase in flight numbers at Gatwick, and that their interests would count as much and more than the Gatwick management wish to operate a larger number of aircraft.

Aircraft noise; nighttime

Gatwick is not able to control its separation of flights sufficiently to adhere to its nighttime quotas because of many factors outside of its control, but which include weather restrictions, other countries strikes, and industrial action (see any quarterly Gatwick activity report). The WHO statistics acknowledged by govt show night flying has a greater impact on residents' health than daytime. Gatwick freely reports that it maxes out its quota in summer when residents are more likely to have windows open. In the recent govt night flight consultation Gatwick airlines show improvements in reductions of noise for residents.

We invite the inspectors to learn more about how Gatwick intends to remain within the current quota regime, and how noise has impacted residents in 2022-2024.

Aircraft emissions

Gatwick claims to never breach air quality limits but can only do this if it ignores downstream emissions from the aircraft it enables to land and take off. Even the govt airport commission in 2015 concluded 51,000 people would have worse air quality if Gatwick expanded to two runways. A study at Gatwick in 2018/9 concluded that the number of ultrafine particles 500 metres downwind from Gatwick was greater than that at the kerb of Londons busiest roads.

There is no ongoing work by Gatwick to assess the impact of all the airport operations on air quality for residents. An expansion of northern airport operations will exacerbate pollutants where pollution is already extreme and where no responsibility is taken, and the impact ignored in favour of the economic benefit brought to the airport owner. Our Parish sitting as it does only a few miles, will see every resident impacted with no relief.

We invite the inspectors to discuss with Gatwick the likely impact of the increased pollution on residents, and to seek Gatwick assistance in measurement of such pollution for future control.

Ancillary issues

The inspectors will be aware that there is not a surplus of available workforce locally. Developers are already making noises for large housing applications to provide new housing for the new staff Gatwick has identified will be required. There is no infrastructure being provided for these: local authorities are expected by Gatwick to provide these, schools, amenities, etc without recompense



at a time when the Local Authorities are hugely financially constrained. Gatwick claims to be community minded, but not to provide the infrastructure for its new employees.

We do not agree with the assessment of the financial impact to the local economy., given Gatwick's calculations ignore the permissions already granted to Heathrow. A significant element of the income assumption is in effect double-counted from the Heathrow data and will increase GDP without the harmful impacts on Gatwick residents.

We invite the inspectors to discuss the source of their income estimates with Gatwick.

Gatwick has placed significant reliance on industry reductions of noise, Co2 emissions and NOx. There are targets set by the industry for 2050, but the industry body Sustainable Aviation confirms that any one of the target attainments would be challenging but to achieve all three will require ingenuity and clear understanding of the inter-dependencies. The CAA acknowledges that there is likely to be a trade-off between noise and emissions in the short term. Even if the inspectors are minded to grant the application, we would urge a requirement to demonstrate the reductions in noise, and emissions to non-new detrimental impacts.

Yours faithfully

Claire Minter
Clerks to Salfords and Sidlow Parish Council