



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 quashed.

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.

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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 overflowed 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 overflowed 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 significantly reduce the negative impact on those overflowed 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 today's 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 is 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.



The Village Hall

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



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

