

I'm a Horley Town, and Reigate & Banstead Borough, Councillor for Horley East & Salfords. I am writing here in a personal capacity.

I have grave concerns about this project, and airport expansion in general (from an environmental and climate change perspective), but for this representation I am focussing on the impacts, both positive and negative, on Horley, Salfords and Sidlow, and their residents.

My comments broadly fall as follows:

- Overstated benefits:
 - ◆ Jobs & economic benefits
- Understated detriments:
 - ◆ Construction phase impacts:
 - Noise
 - Relocation of residents
 - Traffic
 - Air pollution & wider health impacts
 - ◆ Expansion impacts:
 - Surface access
 - Traffic and roads
 - Nuisance parking / ASB
 - Water
 - Air quality
 - Noise
 - Site boundaries & green spaces
 - Health & wellbeing
- Poor engagement with, and understanding by, local residents:
 - Inadequate consultation
 - Overly dense and technical information:

Horley lies to the north of Gatwick Airport so is both indirectly and directly affected by operations and development in and around the airport site. The southern part of Horley, which has some shared boundaries with the airport and will therefore be directly, physically impacted, will in particular suffer as a result of this expansion.

Salfords and Sidlow will be more indirectly impacted, and will also particularly suffer from the noise of additional flights and potentially any changes to flight paths.

Many residents currently welcome Gatwick expansion because they believe the stories about economic revival, and have no real idea about the scale of the impacts. Horley residents have long felt like they live in the 'neglected' end of the borough so the promise of growth and jobs is attractive, especially in these times of economic struggle. The detriments have been well hidden, the consultation process was inadequate, and the information provided impenetrable and overwhelming for most people. Hence I strongly feel that residents have not been given adequate chance to form a fact-based opinion on this expansion, and do not know what is potentially coming their way,

Overstated benefits

Jobs and economic benefit

- A variety of claims about the number of jobs that will materialise as a result of the expanded airport and the construction works have been bandied about (in part by those with a direct interest in the application being approved). As a result there is a widely held idea that jobs for Horley will number in the thousands.
- We need a detailed (and honest, based on reliable modelling) breakdown of jobs by type and location i.e. how many are direct on-airport, how many are predicted for Horley, what sort of jobs these will be, what salaries etc. in an accessible format that people can easily understand.
- Salary and security is really important as house prices (rental and purchase) are high here and many of the 'new' jobs will not pay well enough to enable employees to afford to live locally. How can GAL ensure wages are high enough for employees to be able to afford to live locally?
- Procurement of contractors for construction works - how many will be local - what guarantee is there for this? I know from experience that teams are nearly always brought in from elsewhere. How will GAL ensure construction jobs are kept for local people? Also need to bear in mind many of these roles will be on a temporary basis.
- Teams brought in for the construction period will need to live somewhere, and those on the lower waged new roles will need affordable housing - how are we going to accommodate this? We already have a shortage of affordable housing, and Horley is bursting at the seams with current and proposed new builds as it is (without the accompanying necessary infrastructure) - we don't really have room for more houses, especially as most of the remaining available land is green belt and on flood plain. (areas of land directly adjacent to the build site in Horley, and a little further along in Charlwood have been earmarked for housing schemes which themselves will massively negatively impact the local area without the added impact of the expansion)
- The 'needs case' for jobs in the area is questionable; unemployment rates in Reigate and Banstead are low, and the airport can't fill the vacancies it already has. People don't want these insecure, low paid roles. The airport was a big employer historically in Horley, to some degree it still is, but since the pandemic many people haven't flocked back to the airline industry. It treated them very badly and they want more security. There are far better areas on which to focus in terms of providing long-term, highly skilled (and paid) roles in the broader 'green' industry. This work is crucial to the UK achieving its Net Zero goals (as opposed to airport growth which is actively working against it).
- There are no proposed targets or monitoring in relation to economic benefits, nor any way of ensuring that these will be delivered locally, and those most impacted will be the most benefited/compensated.
- More broadly, the case for airport jobs (both need and provision) hangs around the projected baselines and 'needs case' in terms of numbers of passengers/flights anticipated. These numbers are unreliable. There have been many concerns raised about the modelling which I won't go into here; suffice to say that a 'local benefit' case based on dubious (and likely significantly inflated) figures is not a strong case.
- It was interesting at the Open Hearing how many businesses, from as far afield as London and Brighton, spoke about the benefits they believed they would receive from

expansion, whilst obviously not worrying about any of the consequences. I would like to hope more weight is given to the comments and concerns of those directly impacted by the proposal.

Understated detriments

Construction phase impacts

Noise from the construction phase:

- A concrete crusher is planned to be located off the northern perimeter road - again, very close to Horley residents. There is no detail about this plant in the application even though the noise from its operation could hugely impact people residing nearby. Has an assessment been done to model noise levels and range? Have the hours of operation been defined?
- There is also scant detail in Code of Construction Practice about the two construction sites (size, layout, materials and machinery, perimeter treatments etc.). All these elements could impact on levels of noise (and other nuisance) suffered by local residents.
- High levels of road/vehicle noise from increased traffic, especially from large construction vehicles, which will pass nearby to and through certain residential areas. How will residents be protected from these adverse impacts?
- General construction noise, occurring on a daily basis and sometimes through the night, will massively impact residents living in the Riverside and Gardens Estate areas. This will potentially go on for decades. Noise insulation schemes will not be suitable for / available to everyone, or be sufficient, and will not help during summer months when residents want to open their windows (this also generates a risk of overheating).

Relocation of residents:

- How many residents, living closest to the construction site, will be relocated and when will this process commence? we need much more detail on how this is going to be done, where residents will be moved to; for how long etc.? How will the impacts on travelling to work/school etc. from a different possibly more remote location, and being uprooted from their community, be mitigated? How is the decision to relocate being made - what parameters/thresholds are being used? Who is covering the various associated costs?
- How is this being communicated to residents? What other options are being offered to residents? Beyond health & safety considerations can residents opt to stay and be compensated by other means? I must reiterate - residents have not been made sufficiently aware that they may be forcibly relocated and subject to a highly stressful experience.

Construction traffic:

- How will GAL ensure the requirement for construction traffic to use the M23 is enforced? For example, there is currently no access to the south terminal / M23 spur from the Balcombe Road construction compound - via which route is this traffic going to go? How are GAL going to stop large lorries going down small residential roads to

avoid traffic? The use/creation of access roads through residential areas in xx xx will put massive pressure on the infrastructure, cause noise and congestion problems, and pose a danger to people living there.

- The new road infrastructure is scheduled to complete after the airport construction works - so we will at this point already have the increased traffic but we will not have the increased capacity. Is GAL waiting until the end to do this work because it does not have confidence in its predicted figures?
- There is little information about works to the bridge over the Balcombe Road which look to be substantial. The Balcombe Road is a busy road and a main route in and out of Horley - how long will works take and what mitigations are proposed against the huge, and potentially lengthy, disruption that will be caused? What are the planned diversion routes? What impacts will these have on residents and infrastructure?

Air pollution & wider health impacts during construction:

- Dust impacts - there is no mitigation plan for construction dust - this is essential to prevent harm from air pollution related disease to residents. The presence of high levels of dust will also cause a cleanliness nuisance in the area and adversely impact the natural environment (in fact there is no air quality action plan for the project at all).
- Air pollution will be greatly increased with the onslaught of construction vehicles through the town, with the potential addition of pollution from the various industrial processes taking place on site.
- More people passing through always means more litter (and potentially more fly-tipping of construction waste, another big problem here), which is detrimental to public health, as well as the environment.
- Riverside Garden Park and Church Meadows, the only publicly accessible open spaces in South Horley, will be heavily impacted by construction works and not be (fully) accessible to the public for much of this time, depriving local residents of the only places where they can exercise and enjoy nature. Seeing their beloved parks destroyed, and not being able to utilise these crucial amenities, will be very detrimental to the mental and physical well being of local people.

Expansion Impacts

Surface access:

- Local transport links rail, road (bus and car) will not be able to support the proposed growth in passenger and staff numbers from this expansion. Local feeder roads will not benefit from any improvement or capacity building but will be heavily impacted.
- GAL claims it wants to encourage sustainable transport but there are no plans to expand rail capacity or fund improvements to infrastructure (which will be impacted by increased usage). The heavily used commuter trains from Horley to London, for example, will almost certainly be pushed beyond capacity.
- Similarly, there is no proposed investment in new/improved bus services.
- GAL's predicted future passenger numbers for Gatwick is comparable with that at Heathrow at Heathrow (a 5-terminal airport) but comparable infrastructure improvements are not proposed.

Traffic and roads:

- Horley often has major congestion issues along its main roads, such as the A23 Brighton road and the B2036 Balcombe Road, which will be heavily impacted by the construction works. As well as causing stress and delays, this will increase noise and air pollution in residential areas.
- The modelling/design for traffic flow shows a bias, in as much as more traffic than should will end up being directed towards Horley.
- There will be land take and a permanent acquisition of rights around certain roads, e.g. Woodroyd Avenue, relating to access for construction. This is not common knowledge! These are in residential areas constituting key access points for those in South Horley. In addition, a service road used for bins collections etc. for the local flats will be commandeered, with resulting significant impacts on residents in the immediate vicinity.
- There is also an access road proposed which will encourage construction vehicles to use the residential Balcombe Road route.
- It is hard to imagine how the town and its roads will operate during the construction works of the Longbridge Roundabout, which is a major roundabout and often a bottleneck for traffic (any delays here cause major problems in Horley and beyond). Disruption to this site, and at the site of the bridge works, will cause immense problems, for a long time period.
- Roads in Horley, as in the rest of Surrey, are heavily used and suffer greatly from potholes and other damage. A sustained influx of heavy construction vehicles is going to greatly increase this damage - who is going to cover the cost of remediation?
- We also have a big problem with speeding along these 'main' yet residential roads in Horley. A large number of big vehicles travelling at excess speed, carrying heavy loads, through residential areas, is a great worry which has not been addressed, especially as we are trying to encourage more active travel in our town.

Nuisance parking / ASB:

- Horley is significantly, and increasingly, impacted by inconsiderate and dangerous parking related to the airport, for example, airport passengers trying to avoid parking fees by parking in residential roads. This will only get worse with expansion; GAL may be planning more designated parking spaces but people do not want to pay for these.
- Nuisance parking has knock-on impacts, such as littering and anti-social behaviour. This comes particularly from taxis and hire vehicles which park illegally and whose drivers have been reported urinating in resident parking bays and abusing residents (there has been a recent serious case in Povey Cross Road where a resident was assaulted). Many of these vehicles are carrying passengers to/from the airport, so we can expect a big increase in such problems following expansion.
- We may also expect ASB and other related problems (such as the well-documented increase in prostitution and other illegal behaviours) that can result from a high influx of non-local construction and other workers into an area. Nothing has been proposed by GAL to address any of these issues.

Water:

- Horley Sewage Treatment Works (HSTW) are at/beyond capacity and regularly 'overtop' raw sewage directly from storm tanks onto public land (this is completely illegal - not the same as permitted discharge into rivers). HSTW 'permitted' discharge levels are also extraordinarily high, and measured water quality very poor, in local rivers (River Mole and tributaries, such as the Gatwick Stream which runs through Riverside Park). Thames Water advise they have plans to bring the site up to permit-level compliance by ~2027 but these works will not increase capacity to accommodate any future growth.
- There are under construction and proposed housing developments in the area which cannot be accommodated by current TW capacity at local sites, and Gatwick's expansion will greatly add to this pressure. This great concern has not been adequately addressed by GAL.
- Horley is in a water stress area and it is not at all clear from the proposals how the increased demand for water, resulting from expansion, will be met.
- The timing of the proposed flood risk mitigation works will result in a period of increased flooding risk to properties in certain areas around Longbridge. It is unclear what the impacts will be on local ecology, in an area which already experiences frequent and significant flooding.

Air quality:

- Aircraft are a major source of ultra-fine particles; Horley already has concerningly high levels of UFPs - using WHO guidelines, the number of hours 'high' UFP exposure in Horley is currently greater than that at the kerb of a major road in London. GAL has not included any assessment of UFPs in the application. How will they protect the residents in these areas from even worse air pollution?
- South Horley is covered by an Air Quality Management Area which includes Riverside Garden Park (which lies directly along the very busy main A23 London Road), so already has issues with air pollution.
- The modelled air quality data GAL provides is misleading because it does not take into account the recent and increasing improvements derived from reduced road vehicle emissions (which are, in effect, masking the negative impacts of the other air pollution sources). Other areas in the borough with AQMAs, such as Hooley, have seen dramatic improvements in air quality due to a reduction in vehicle emissions - Horley residents deserve similar improvements.

Noise:

- A large housing estate has been built under one of the NPRs and is not protected by the current AIP regulations (like the rest of Horley).
- All of Horley suffers from airport noise - aircraft overhead and taxiing on the runway - this will now significantly increase and the assessments and mitigations, such as the noise envelope, are wholly inadequate.
- There is now no sound barrier proposed along the A23 boundary with Riverside Park. How is GAL proposing to protect against the already significant traffic noise experienced by visitors to Riverside park, which will only increase with an extra lane, more traffic, more flights, and the removal of the crucial treeline along the main road?

Site boundaries and green spaces:

- The removal of a significant tranche of green space along the side of Riverside Garden Park facing the A23, with established vegetation and mature woodland, will have a dramatically adverse impact on the park, ecologically, visually, and auditorily - these trees act as a sound, sight and 'psychological' barrier against the very busy A23 London Road, and their removal will totally spoil the park. This area will take 25-30 years to recover but no mitigation has been proposed to reflect this fact.
- Access through Riverside Park to the airport will be halted during construction works - this is currently a very popular walking/cycling commuting route.
- Another popular, and historic, green site, Church Meadows, will be lost for recreational uses and fundamentally harmed (with areas lost) during the surface access works.
- Both of these important green sites have been omitted from the project site description.
- Grass verges will also be lost, resulting in a less rural appearance in what is already a heavily urbanised area
- GAL has not quantified the numbers of trees and amount of habitat that will be lost; the plans lack critical detail on protection for trees and ancient woodland buffer zones.
- Ecological impacts will extend beyond the project site boundary and the approach taken by GAL should address this.
- It appears that GAL are proposing construction sites on land that is beyond the red line of the planning application, including in/near Riverside Garden Park and north of the South Terminal roundabout. We need clarification on exactly what areas are being proposed for what, including larger scale accurate maps showing details of the specific proposed land take, layout alterations, tree removals etc.

Health & wellbeing:

- An Equality Impact Assessment (EqIA) has not been undertaken for the project, which seems extraordinary, given its size and scope. This lack means that people are not currently protected against being disadvantaged or discriminated against during the construction or operation phases of the proposal.
- The way GAL has looked at health impacts completely misses the harm caused to people living adjacent to the A23 London Road once it has been widened and the tree line removed - it does not even include a map of the area!

Poor engagement with, and understanding by, local residents

Inadequate consultation:

- I have conversed with many residents about the proposal. Most were not even aware there was a consultation, or had a vague awareness but were not aware of how to attend/engage. A significant number didn't even know there was an expansion planned, and most did not really have any understanding at all about what the project entailed.
- Those who did attend the 'burger van' event said that the detail was minimal and those hosting could not answer their questions.
- Most residents found the information difficult to 'make sense of' in real terms, and lacking in crucial detail.

- The maps were totally rubbish!

Overly dense and technical information:

- Conversely, the documentation provided by GAL on the Planning portal is/was far too detailed/technical/confusing for most 'laypeople' and there is way too much for any average mortal to wade through.
- Residents need supporting through this process so they have sufficient detail, with honest, directly applicable representation of how things will affect them, in a format they can understand and with the facility to easily ask questions (and get answers). This has not really happened and I feel many people are not able to make an informed decision or effectively engage in the process, and will seriously lose out as a result.
- The maps are still rubbish!