**To : Airports Commission Consultation**

**From : CPRE Surrey Aviation Group**

**30th January 2015**

CPRE’s national office in London issues policy guidelines to all its branches across the country on issues of major importance. Obviously, a choice regarding the possible future runway expansion of Gatwick and Heathrow falls into this category. CPRE Surrey recognises that whether a new runway were built at Gatwick and/or Heathrow it would have very serious implications in terms of unacceptable environmental harm, and would inevitably result in significant change to the character of the county, its heritage and much frequented countryside.

We believe that another matter of national significance is also at stake which relates to how the future development of the country is to be planned, and in particular the North/South divide. It is our view that all 3 runway options that are currently proposed are likely to be found to have unacceptable disadvantages. We therefore argue that further options will need to be considered which include whether another runway at either proposed location in the South is really needed, and whether other existing airports with spare capacity to the North of London should be investigated further. It is also conceivable that with the adoption of larger aircraft no new runway will be required at all. It seems sensible to us to use existing airport capacity before increasing it further.

CPRE Surrey has concentrated on Gatwick in this submission as we are not in a position to evaluate the two Heathrow options under consideration from a technical viewpoint. Clearly, safety will be a major consideration here. Health issues relating to noise disturbance and air pollution are also largely outside our sphere of experience. We find it surprising that at this time a parallel consultation is in progress as to whether Air Pollution Monitoring should be continued. Our main priority has to be the nationally important Surrey countryside and all those who value this remarkable rural environment whether as residents or visitors with its spectacular landscapes so close to London.

**1. INTRODUCTION TO THE CPRE SURREY AVIATION GROUP**

CPRE Surrey has the third largest county membership of the Campaign to Protect Rural England after its Kent and Sussex Branches. Nationally CPRE has a membership of over 60,000. The CPRE Surrey Aviation Group was formed in 2004 with the objective of bringing those organisations together which are concerned about all forms of aviation activity that have made Surrey amongst the most overflown counties in the country. The Group meets 3 times per year to review current developments in this context. CPRE Surrey is a member of the Aviation Environmental Forum (AEF), the Gatwick Area Conservation Campaign (GACC), and the Heathrow Area Campaign Against Noise (HACAN), all of whom are represented in the CPRE Surrey Aviation Group. CPRE Surrey is also linked to AirportWatch and is an Advisory Board member of the Surrey Hills Area of Outstanding Natural Beauty (AONB) Partnership. Representatives from CPRE Hampshire, Kent and Sussex often attend Group meetings. The following additional organizations are represented in the CPRE Surrey Aviation Group : Charlwood Parish Council, the Chobham Society, Cudham Residents Association, Farnborough Area Residents Association (FARA), Friends of the Earth (Biggin Hill), the Helicopter Noise Coalition, the Lasham Gliding Society, Nutfield Parish Council, the Ottershaw Society, Salfords & Sidlow Parish Council, and the Staines Society.

**2. CPRE SURREY OBJECTION TO ADDITIONAL RUNWAY AT GATWICK**

CPRE Surrey objects to the proposal for an additional runway at Gatwick on the following factual grounds :

* A two runway Gatwick is forecast to handle 96 million passengers a year; this is bigger than Heathrow’s current passenger capacity
* A second runway would create 20,000 extra airport jobs on top of the existing number of 23,200, to which new and existing firms would add 25,000 more employment nearby
* The buying power of this extra workforce population would increase the employment figure again by 15,000, making a grand total of over 60,000
* As there is only low local unemployment, this job expansion would provoke a large in-migration into the South of England from other parts of the UK, EU and beyond
* More than 40,000 extra houses would be required, which is the equivalent of building another Crawley, plus all the services needed to accommodate this dramatic population growth
* The new airport would only be 100 yards from the urban boundary of Crawley, and 286 business premises would have to be demolished to make way for it
* Three times as many people as now would be affected by aircraft noise, many of whom will require high compensation to be paid them for this new disturbance
* New flight paths over previously peaceful areas in nationally important AONB countryside will destroy its rural tranquillity and character that policy requires to be protected
* The quietness of rural surroundings makes the disturbance impact of overflying aircraft even more annoying than in urban areas where traffic noise is a continuous background
* The economic impact of more noisy overflying on tourism needs to be properly assessed for popular heritage destinations such as Leith Hill and Hever Castle.

**3.  SURREY HILLS AREA OF OUTSTANDING NATURAL BEAUTY**

CPRE strongly objects to the 3 options for runway development on environmental grounds. If allowed to proceed, they will result in greatly increased overflying of nationally important Surrey countryside in both an Area of Outstanding Natural Beauty (AONB) and an Area of Great Landscape Value (AGLV). The Surrey Hills AONB covers 25% of the county area. A review of its boundaries is to be undertaken by Natural England and is expected to recommend expansion to absorb the county designation of AGLV into the AONB.

We maintain in particular that a second runway at Gatwick would harm and undermine both the AONB and AGLV rural environment when planning policy requires that it should be protected, conserved and enhanced. CPRE was present at the Surrey Hills Board meeting on 21st January at which it was resolved that its concerns on this subject should be submitted to the Commission.

**The National Planning Policy Framework 2012** states that “Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas...” (paragraph 115). Planning policies and decisions should aim to...identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason” (paragraph 123). “By encouraging good design, planning policies, and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation” (paragraph 125).

The NPPF also includes Chapter 9 “Protecting the Green Belt”, Chapter 11 “Conserving and enhancing the natural environment” and Chapter 12 “Conserving and enhancing the historic environment”. All these contain additional relevant planning policies that are material considerations in this context. Development of the new runway at Gatwick would harm the Green Belt whose openness and permanence would be undermined.

**The Statutory Surrey Hills Management Plan 2014 – 2019** has just been published by the Board of the Surrey Hills AONB Partnership of which CPRE is an Advisory Member. Local Authorities have a statutory duty to adopt the plan and public bodies must have a duty of regard to the purposes of AONB designation and its Management Plan policies. Relevant policies include the following :

**a. Recreation & Tourism**

RT3 “Significant viewpoints will be identified, conserved and enhanced. The Planning authorities will seek to protect and safeguard access to significant views.”

RT6 “The quiet enjoyment of the Surrey Hills will be protected.”

**b. Land Use Planning**

LU1 “In balancing different considerations associated with determining planning applications and development plan land allocations, great weight will be attached to any adverse impact that a development proposal would have on the amenity, landscape and scenic beauty of the AONB.”

LU2 “Development will respect the special landscape character of the locality, giving particular attention to potential impacts on ridgelines, public views, tranquillity and light pollution.”

LU5 “Development that would spoil the setting of the AONB, by harming public views into or from the AONB, will be resisted.”

**c. Farming**

F1 “Farming as a viable and sustainable enterprise, within and adjacent to the AONB, will be encouraged and supported...”

**d. Historic & Cultural Heritage**

HC3 “Development proposals will have due regard to the locally distinctive character of rural settlements and the setting of historic buildings.”

**e. Transport and Traffic**

TT4 “Major transport schemes will have due regard to the national AONB designation and measures will be taken to reduce any impact on the Surrey Hills landscape.”

The Districts which are Core Funding Partners of the Surrey Hills AONB are Guildford, Mole Valley, Reigate & Banstead, Tandridge and Waverley. Other Partners include DEFRA, the National Trust and Surrey County Council. Advisory Partners in addition to CPRE include Natural England, the CLA, the NFU, the Surrey Wildlife Trust, and the Surrey Association of Local Councils.

**4. WHAT WOULD A SECOND RUNWAY AT GATWICK MEAN FOR SURREY?**

**a. Loss of tranquillity and air quality**

+ Double the number of aircraft on existing flight paths to and from Gatwick

+ Almost double the number of Gatwick flights over Surrey alone

+ More concentrated flight paths, causing intense aircraft noise nuisance for those unfortunate enough to live underneath

+ More night flights between 11.0 pm and 7 am

+ More planes, more road and rail traffic congestion, more air and light pollution

**b. Loss of countryside to new housing**

+ Up to 40,000 new houses and more business buildings of all types in addition to the expansion predicted in the current Local Plans

+ New schools, hospitals, clinics and other community amenities – if the investment funding can be found

+ Widespread urbanisation, more pressure on local services, and a heavy loss of Metropolitan Green Belt open space

+ Harm to nationally important countryside in the Surrey Hills and the destruction of heritage communities such as Charlwood

+ Loss of 14 hectares of ancient woodland, valued farming land, and high quality landscape which will be lost for ever

**c. Road & Rail Chaos**

+ Over 136,000 extra vehicles on our roads every day

+ More frequent gridlock on the M25 and M23 will be the inevitable result

+ More congestion will follow on A roads, villages and country lanes

+ Over 110,000 more passengers on train lines which already are notorious for delay and overcrowding

+ Lack of investment will mean standing room only!

**5. WHY IS GATWICK THE WRONG PLACE FOR A SECOND RUNWAY?**

+  Gatwick is not an aviation hub and handles very little freight in addition to passengers

+  It is South of London and as a result less accessible to reach for those living in other parts of the country

+ Good planning requires a more even distribution of development in the UK with less emphasis on the crowded South East with its existing full employment

+ The Cross Rail investment is already in place which will be a major advantage in terms of London communications that Gatwick cannot match

+ The proposed HS2 development suggests that other airports with spare capacity which are North of London should be investigated further

+ As Gatwick Airport has paid no corporation tax for the past 4 years, and specialises in low price tickets for the tourist business, viability problems seem likely to increase

**6. FUTURE ECONOMIC CONSIDERATIONS AFFECTING AIRPORT CAPACITY NEED**

+  Since airlines pay no fuel tax or VAT, air fares are made artificially cheap and overseas travel subsidised even after air passenger duty is taken into account

+  If airlines were made to pay comparable tax to road companies, the demand for air travel is likely to diminish as ticket prices rise in cost

+  When larger aircraft are used in future, the number of passengers per plane will increase, and the number of flights may reduce affecting airport capacity need

+  Airlines specialising in low cost travel will have to pay more to airports such as Gatwick where high investment of all kinds is necessary to compete and remain viable

+  Heathrow has a major advantage because this is where the airlines wish to invest in landing “slots”; other airports in this country will always be at a competitive disadvantage

unless massive infrastructure investment is made which will be difficult to justify

+  Problems are arising in connection with airspace over Surrey and the South East; how will this be handled if capacity at Gatwick is doubled and increased at Heathrow?

+  It is hard to reconcile the likelihood that the UK will have to pay an air pollution penalty to the EU in connection with climate change without passing on extra cost to the air travel sector in this context

**7. LOCALISM**

CPRE is well aware of the emphasis placed on Localism with regard to planning policy. We have attended many meetings where the future of Gatwick has been discussed at length and a number of CPRE Surrey members have spoken to a wide audience on this topic including local MPs, County and District Councillors, Parish Councils, Residents Associations and Amenity Groups. It is apparent that a very substantial body of local opinion objects to the runway proposal and does not agree with the arguments advanced in its support. We are aware that Kent and West Sussex Councils, Mole Valley District, Crawley and Horsham have all voted against the Gatwick expansion proposal. CPRE Surrey was also present at the Commission’s conference in Crawley in December at which Surrey County Council presented its assessment of the Gatwick and Heathrow runway options and indicated those points on which further analysis is required.

CPRE Surrey endorses the Consultation response of the SE Region Transport Group.

**8.  CONCLUSION**

We therefore urge the Howard Davies Commission to review whether an additional runway is needed at all at Gatwick or Heathrow. We believe that existing spare capacity at other airports should be considered first before further investment is made. We are not convinced that additional expansion in runways at airports in the South of England should be contemplated at all, given the imbalance in the structure of economic development in the UK and the existing infrastructure problems with which we are familiar in Surrey. The building of the HS2 is partly in order to encourage new investment elsewhere to the North. The road and rail infrastructure serving Gatwick from London is not adequate. The opening of Cross Rail gives Heathrow the advantage in this context. Planning the improvement of the North Downs rail route from Reading to Gatwick via Guildford is still only at a preliminary stage and will be a complicated and expensive project requiring a great deal of time and money.

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