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SURREY

Ted Beresford Knox,
Head of Planning,
The Planning Department,
Crawley Borough Council,
Town Hall,
Crawley RH10 1UZ

8th September 2009

Dear Mr. Knox,

**Gatwick North terminal Expansion
Planning Application CR/2009/0326/FUL**

CPRE Surrey considers that this application is of more than local significance and should be called in for decision by the Secretary of State with a public inquiry. This is unless either your council decides to refuse the application or attaches conditions which ensure that there is no increase in noise, air pollution, or road traffic (other than increased use of public transport) and there are tighter controls on waste and water usage.

We fully support the detailed objections made by GACC. Our main objections are;

1. Prematurity/Lack of Need

- The application is premature because there has been a sharp downturn in the number of flights and passengers from Gatwick and there is no indication that the old levels will be reached in the short term.
- The Secretary of State has announced that he wishes to see high speed trains taking over from short haul flights in order to help reduce air pollution and the rate of climate change. The Conservative party have expressed similar views.
- The airport is up for sale and it is quite likely that the new owners will have different ideas on how they wish to run the airport.
- It would seem that one of the reasons behind the application, apart from the extra passenger capacity, is to allow an increase in retail floor area which, we contend, is unnecessary.
- We understand that the companies using Gatwick have reservations on the proposal because it is likely to result in higher airport charges and landing fees to help finance it.
- To conclude the airlines don't want it, the residents over a large distance don't want it and, with the cut back in flights, certainly in the short term, there is existing capacity. Therefore, there is no case at the present time for the proposed terminal expansion and so we suggest that it is premature and could be determined on this basis.

2. Pollution and climate change

- There will be an increase in pollution from vehicles on the M23 and other roads serving the airport, such as the A217. We note that 40% of non-transfer air passengers should use public transport but this target has

never been achieved. There should be conditions requiring measures to increase the use of public transport and improvements to the rail services to provide more cross country connections.

- The planes will increase the amount of pollution, including higher concentrations of NO2.
- There will also be a significant increase in the amount of CO2 resulting from the extra flights which will be generated if the number of passengers increases to 40,000. (This has been calculated as 360,000 tonnes of CO2 per annum and much of this will be at high altitudes which will be 2 to 4 times more damaging.) This increase in CO2 emissions is not in line with government targets for 2050. We appreciate that the Inspector at the Stanstead Inquiry decided that climate change issues should not be taken into account but, as information is available for emissions caused on taxiing, take-off and landing at Gatwick, we would have thought it is now a relevant consideration which should be covered by condition.

3. Flooding and water

- The issue of increased flooding and runoff has not been resolved. Certainly, the removal of part of the North Terminal bund would be unacceptable.
- The proposed increase in the number of passengers could lead to an increased demand of over 100,000 cubic metres, and this is in an area which is 'seriously water stressed'. In addition, despite the likely harmful effects of climate change, 36,000 new dwellings are proposed in the Gatwick sub-region in the 20 years up to 2026, putting even greater pressure on existing supplies.
- There should be no overall increase in water use and greater efforts must be made to increase recycling rates.

4. Waste

- The target for recycling waste is too low and a condition should require a higher target.

5. Safety

- The main Brighton railway line intrudes on the Gatwick Public Safety Zone. Already there have been a number of near misses. A government circular 2/2002 states that there should be no new transport infrastructure developments within the PSZ – so why has this application even be permitted?

6. Noise

- The application underestimates the increase in numbers of flights over the existing
- It doesn't take into account the likely hood of larger noisier aircraft
- It underestimates the number of people who will suffer noise above the 55 Lden contour
- We recognise that the applicants appreciate that there will be an increase in both air noise and ground noise, but for the reasons above, they have underestimated the extent of the increase.

7. Economic implications

- There can be little doubt that that Gatwick creates a net loss to the economy because of the large net outflow of tourists. Greater efficiencies in the airport sector have also resulted in a downturn in the number of employees.

We agree with GACC that the **2008 legal agreement** requires strict environmental conditions if the second Principal Objective is to be met. Therefore, we request that the application be refused, but if the Council is minded to grant permission, the conditions set out in the GACC letter be applied.

Yours sincerely,



Gillian Hein Vice-chairman CPRE Surrey