



Crawley 2035

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| <p>Ref No:</p> <p><i>Office use only</i></p> |
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Crawley Submission draft Local Plan Representation

Please return your completed representation form to Crawley Borough Council by 5pm on 2 March 2020.

Representations can be made via this form and emailed to forward.planning@crawley.gov.uk or sent via post to: Local Plan Consultation, Strategic Planning, Crawley Borough Council, Town Hall, The Boulevard, Crawley, RH10 1UZ. Alternatively, representations can be made online using the [eform](#) which allows attachments of documents.

This form has two parts:

PART A – Personal details

By law, representations cannot be made anonymously. All representations will be published alongside your name, company name (if applicable), and your client's name/company (if applicable). The Council will use the information you submit to assist with formulating planning policy.

Further information about Data Protection Rights in line with the provisions of the General Data Protection Regulations and Data Protection Act 2018, for example, how to contact the Data Protection Officer, how long information is held or how we process your personal information can be found at www.crawley.gov.uk/privacy. Specific reference to the Local Plan and planning policy related public consultation can be found on: www.crawley.gov.uk/pw/web/PUB351893

PART B – Your representation

Please fill in a separate sheet for each representation you wish to make. You may submit multiple "PART B" sections with a single "PART A" completed.

PART A – Personal details

Please ensure that you complete all fields in 1. If a planning agent is appointed, please enter the Title, Name and Organisation in 1, and complete the full contact details of the agent in 2.

| | 1. Personal details | 2. Agent's details |
|-----------------|-------------------------|--------------------|
| Title: | Ms | |
| First name: | Rita | |
| Surname: | Burns | |
| Organisation: | Gatwick Airport Limited | |
| Address line 1: | Gatwick Airport | |

| | | |
|-----------------|------------------------------------|--|
| Address line 2: | South Terminal, Destinations Place | |
| Town/city: | Crawley | |
| Postcode: | RH6 ONP | |
| Telephone: | | |
| Email: | | |

PART B – Your representation

3. Please tick the document that you would like to make a representation on:

- Crawley submission Local Plan
- Crawley submission Local Plan Map
- Crawley submission Sustainability Appraisal
- Habitats Regulation Assessment Screening Report

4. Which part of the Local Plan does this representation relate to?

| | | | | | |
|------------|--|---------|--------------------|--------|--|
| Paragraph: | | Policy: | See GAL Submission | Other: | |
|------------|--|---------|--------------------|--------|--|

5. Do you consider the Local Plan to be: *(Please tick)*

- | | | |
|---|------------------------------|--|
| 5.1. Legally compliant? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 5.2. Sound? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 5.3. Compliant with the duty to co-operate? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

6. Please give details explaining your response to 5.1, 5.2, or 5.3 below. Please be as clear as possible.

The GAL Formal Submission in response to the Regulation 19 draft Plan considers the soundness of specific planning policies proposed within the draft Plan and requests specific amendments to the proposed text of the draft Plan's policies and supporting text. We consider the draft Plan to be in parts to be unsound, not legally compliant and to have failed under the Duty to Co operate requirements.

GAL consider that there are policies with the draft Plan which are contrary to the national policy requirement to safeguard land at Gatwick for future potential expansion and will provide the supporting evidence at the Examination

In particular GAL strongly objects to the proposed policy SD3 in the draft Plan for designation of the North Crawley Area Action Plan on land which is currently safeguarded for potential future airport expansion and considers the draft plan is unsound in this respect.

If required, please continue your response on an additional piece of paper and securely attach it to this response

- 7. Please set out what modification(s) you consider necessary to resolve the issues you have identified above. You need to state why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to suggest how the wording of any policy or text should be revised. Please be as clear as possible. Any non-compliance with the duty to co-operate is incapable of modification at examination.**

Please see the Formal Representation from Gatwick Airport Limited of March 2nd 2020.

If required, please continue your response on an additional piece of paper and securely attach it to this response

*Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations. **After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues s/he identifies for examination.***

8. If your representation is seeking a modification, do you consider it necessary to participate in the public examination hearings? (Please tick)

No, I do not wish to participate in the examination hearings

Yes, I wish to participate in the examination hearings

9. If you wish to participate in the public examination hearings, please outline why you consider this to be necessary:

Gatwick Airport is nationally significant infrastructure within the catchment of Crawley Borough Council. The policies within the local plan are directly relate to the safe and efficient operation of the airport, the growth of the airport and managing the impacts of the airport on the surrounding community. The airport has a significant positive influence in the socio economic and transport patterns in the borough and the wider subregion and is a key stakeholder in the Gatwick Diamond. GAL wish to participate in the Examination for all policies we have submitted a formal representation on.

In addition, GAL consider that there are policies with the draft Plan which are contrary to the national policy requirement to safeguard land at Gatwick for future potential expansion and will provide the supporting evidence at the Examination

The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the public examination.

If you would like to make a representation on another policy or part of the Local Plan then please complete a separate PART B section of the form or securely attach an additional piece of paper. Copies of the representation form can also be downloaded from the council's website at: www.crawley.gov.uk/crawley2035

Signature

Rita Burns

Date

March 6th 2020

YOUR LONDON AIRPORT



2nd March 2020

Sallie Lappage
Forward Planning
Crawley Borough Council
Town Hall
The Boulevard
Crawley
West Sussex
RH10 1UZ.

Dear Mrs Lappage,

**Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012.
Crawley 2035 Local Plan Review – Draft Submission Local Plan Consultation (Regulation 19) January 2020.**

Formal Response from Gatwick Airport Limited.

Please find enclosed Gatwick Airport Limited (GAL's) representations on the Draft Submission Crawley Borough Local Plan 2020 – 2035 "Crawley 2035" January 2020 ('the draft Plan').

This submission builds on GAL's earlier responses to the Early Engagement Local Plan (Regulation 18, July 2019) and provides our representations to a number of the policies which we consider to be of specific relevance and importance to the operation of the airport, development management and land use planning aspects.

As context and background, Gatwick Airport is the UK's second largest airport and the most efficient single-runway airport in the world. It serves more than 230 destinations in over 70 countries with more than 46 million passengers a year on domestic, short and long-haul point-to-point services. These levels of operation are predicted to grow and we have developed our plans for future growth as part of our recently published Airport Masterplan (July 2019). Gatwick is a major economic driver for the Gatwick Diamond and therefore has a significant influence upon not only Crawley borough and the town, but also the wider London and South East Region. Furthermore, Gatwick is Crawley's largest employer generating over 24,000 on-airport jobs and a further 12,000 jobs through related activities. The airport has excellent public transport links and provides good levels of connectivity for residents and workers in the Borough and surrounding areas.

This response considers the soundness of specific planning policies proposed within the draft Plan and also requests specific amendments to the proposed text of the draft Plan's policies and supporting text.

In preparing this response, we have sought to provide an appropriate level of reasoning and justification for the amendments which are appropriate at this stage. We are willing to participate in the Examination in Public and provide further supporting information and commentary on the draft Plan as currently proposed.

In responding to the draft plan, GAL acknowledges that local plans are required to be sufficiently flexible to be able to accommodate needs not anticipated in the Plan and to allow a rapid response to changes in circumstances (NPPF paragraph 11(a)). The draft Plan addresses the existing airport operation in its single runway and two terminal configuration. However, it is essential that the draft Plan is prepared taking into account the sustainable growth of the airport by making best use of its existing runways.

The Gatwick Airport Master Plan published in July 2019, is an important consideration in the preparation of the Local Plan and GAL have made it clear that we intend to bring forward an application for Development Consent which will enable the routine use of our existing northern runway during the early years of the new Local Plan. Although the proposed northern runway scheme will be subject to a different planning process and not determined by the local planning authority, it is nonetheless crucial that the draft Plan should anticipate this project coming forward and provide the necessary framework in which development may be supported.

Furthermore, with the potential for an additional wide-spaced runway and associated infrastructure (to the south of the current airport boundary) coming forward during the lifetime of the Plan period (to 2035) the draft Plan should demonstrate that it is sufficiently flexible to be able to respond to the changes that will arise should this occur. This also forms a significant material consideration that has direct implications for the draft Plan (NPPF para 22). GAL considers that it is imperative that the Local Plan continues to safeguard the land around the airport for such potential future airport expansion. The requirement to safeguard land at Gatwick is clearly laid down in existing national policy and is required even more so now given the Court of Appeal ruling on 27th February 2020 to declare the Airports National Policy Statement in relation to a new runway at Heathrow as unlawful. GAL strongly objects to the proposed policy SD3 in the draft Plan (Chapter 3) for designation of the North Crawley Area Action Plan on land which is currently safeguarded for potential future airport expansion and considers the draft plan is unsound in this respect.

GAL is keen to engage further with CBC in the next stage of plan preparation and would be pleased to discuss our representations in advance of the preparation of the forthcoming Examination in Public. If you have any further queries, please do not hesitate to contact me.

Yours faithfully,

Rita Burns

Rita Burns
Spatial Planning & Policy Manager
Gatwick Airport Limited

Gatwick Airport Limited: Formal Response to the Draft Local Plan ‘Crawley 2035’ (Regulation 19 Public Consultation)

Introduction

This GAL response is structured as follows:

The response firstly covers ‘Chapter 10: Gatwick Airport’, which is the chapter of most relevance to GAL.

Secondly, we provide our response to ‘Chapter 3: Sustainable Development’ and the proposed Policy SD3 which covers the removal of the formerly adopted Policy GAT2 relating to the continued need for the safeguarding of land for potential future airport expansion. We believe that proposed Policy SD3 is clearly contrary to Government planning and aviation policy and is therefore unsound.

The response also covers other policies in the draft plan as follows:

Policy:

DD6: Aerodrome Safeguarding

DD7: Advertisements

EP4: Development and Noise (and Noise Annex)

EC1: Sustainable Economic Growth

EC2: Economic Growth in Main Employment Areas

EC6: Visitor Accommodation

H3d: Upward Extensions

H8: Gypsy, Traveller & Travelling Showpeople Sites

IN1: Infrastructure Provision

IN2: The Location and Provision of New Infrastructure

ST1: Development and the Requirements for Sustainable Transport

ST3: Improving Rail Stations

ST4: Safeguarding a Search Corridor for Crawley Western Relief Road

Chapter 10 Gatwick Airport

Chapter 10 focuses specifically on Gatwick Airport and sets out three local plan policies. GAL's response relates to each of the 3 policies as follows:

- GAL generally supports Policy GAT1 subject to some amendments to specific wording in the policy.
- GAL supports Policy GAT2 Gatwick Airport Related Car Parking
- GAL supports Policy GAT3 Employment Uses at Gatwick.

Policy GAT1: Development of the Airport

1.1 GAL broadly supports GAT1: 'Development of the Airport' subject to suggested changes to specific wording in the policy and the supporting text.

1.2 GAL considers that Policy GAT1 should include the requirement to ensure incompatible forms of development are not permitted on safeguarded land for an additional runway. We also consider that it should be made clear that the remit of Policy GAT1 is to allow for proposed development which is to be determined by the Local Authority and not for applications which would be subject to a separate DCO process. GAL also seeks amendments to the policy in relation to the need for compensation.

1.3 Accordingly we have set out the following proposed amendments to the text of Policy GAT1 and the Reasoned Justification.

Policy GAT 1 - Proposed Amendments

2.1 The text below sets out how GAL considers the policy wording of GAT1 should be reworded including text to be deleted as strikethrough and new text to be inserted in *italics*.

Policy GAT1: Development of the Airport with a Single Runway

Within the airport boundary as set out on the Local Plan Map, the council will support the development of facilities which contribute to the sustainable growth of Gatwick Airport as a single runway two terminal airport provided that:

- i. The proposed use is appropriate within the airport boundary and contributes to the safe, secure and efficient operation of the airport; and
- ii. The impacts of the operation of the airport on the environment, including noise, air quality, flooding, surface access, visual impact, biodiversity and climate change, are minimised, *controlled and managed and*, where necessary satisfactory safeguards are in place to ensure they are appropriately mitigated, and ~~as a last resort fair compensation is secured~~ *where it can be demonstrated that adequate mitigation of impacts is not achievable in relation to biodiversity* as a last resort appropriate and fair compensation *is secured*; and
- iii. ~~Adequate supporting~~ Infrastructure, particularly for surface access, *necessary to support the safe and secure operation of the airport*, can be put in place; and

iv. *Where considered necessary and appropriate, relevant related* benefits to Crawley's local economy and community are ~~maximised~~ *secured*.

The control or mitigation of impacts, *proportionate* compensation *in relation to biodiversity, and any associated* infrastructure and benefits, will be secured through appropriate planning conditions and / or S106 obligations.

Where development to enable sustainable growth at Gatwick Airport will be a Nationally Significant Infrastructure Project, such as the use of the northern runway, i-iv above will be taken into account by the Council in preparing its Local Impact Report.
~~i-iv above will be expected to be met by the airport operator and secured through a s106 Agreement.~~

Any development on land identified for a new runway should not add costs, complexity or be incompatible with the potential future expansion of the airport to accommodate the construction of an additional wide spaced runway (to the south).

Policy GAT1 Supporting Text - Proposed Amendments

2.2 The text below sets out GAL's suggested changes to Paragraph 10.12 and 10.13 of the draft Plan showing text to be deleted as strikethrough and new text to be inserted in *italics*.

Paragraph 10.12. Much of the recent significant growth in passenger numbers at Gatwick Airport, through the use of larger aeroplanes and more flights at "off-peak" times and seasons, has not required new development to support it. The Airport Operator also has permitted development rights for new facilities to support rising passenger numbers. Measures are in place through the S106 Agreement between CBC, WSCC and Gatwick Airport to mitigate some of the adverse impacts of airport growth, and where planning permission is required for new development at the airport, the council will need to ensure that it contributes to the safe and efficient operation of the airport and that *where necessary* its impacts are minimised or mitigated *as appropriate* ~~as required~~, sufficient supporting infrastructure can be put in place, and *related* local benefits are ~~maximised~~ *secured*. The council will also consider the cumulative impact of numerous small developments. Planning conditions and a further S106 Agreement will be sought.

Paragraph 10.13. Sections 14 and 23 of the Planning Act 2008 define Nationally Significant Infrastructure Projects to include the construction, extension or alteration of a runway or building at an airport expected to be capable of increasing by at least 10 million per year the number of passengers for whom the airport is capable of providing air passenger transport services, *or of increasing by at least 10,000 per year the number of air transport movements of cargo aircraft for which the airport is capable of providing air cargo transport services*. Applications for such developments would therefore be determined by the Secretary of State through the Development Consent Order (DCO) process. The Gatwick Master Plan 2019 proposal to use the standby runway would increase capacity by over 10 mppa and would therefore be determined through a DCO process. Gatwick Airport has formally commenced this process with its Scoping Report in September 2019. Submission of the DCO is anticipated in late 2020 with, should it be approved operational use starting in 2026. Maximum capacity

would be reached in 2038. The council would expect the environmental impacts to be *controlled* minimised, and *or* mitigated as *appropriate*, the necessary infrastructure to be provided, and *related* benefits to the local area to be maximised *secured*, and *through* ~~is~~-working with neighbouring authorities to ensure that these objectives are achieved across the wider area.

Policy GAT1 – Justification for Proposed Amendments

3.1 Policy GAT1 (i): No Change Proposed

3.2 Policy GAT1 (ii) as drafted - Proposed Amendments

3.3 To ensure that adverse impacts are appropriately considered GAL suggests that Policy GAT1 paragraph ii) should be amended to read, where necessary, such impacts are “*controlled and managed*” rather than “*minimised*”. This is because, whilst GAL does seek to minimise impacts of development, there has to be a balance between minimising impacts and securing the benefits of development, such that in some cases minimising rather than mitigating impacts of a development might be incompatible with securing and optimising overall benefits and sustainable growth.

3.4 GAL considers that the requirement to provide compensation arises only in relation to unavoidable impacts to biodiversity (NPPF 2019 para 175 points (a) & (c)) and where it is agreed that the mitigation of impacts on biodiversity is not achievable or suitably effective. Whilst GAL fully supports the need for appropriate mitigation measures to control adverse environmental impacts, GAL does not support the inclusion in Policy GAT1 paragraph (ii) of the requirement for the airport to ‘compensate’ for the impacts on environmental aspects relating to noise, air quality, flooding, surface access, visual impact and climate change. GAL considers it should be made clear in Policy GAT1(ii) that the requirement for compensation relates to matters of biodiversity only in line with the requirements of the NPPF.

GAL objects to GAT1 (iii) as drafted - Proposed Amendment

3.5 GAL considers the wording ‘*adequate infrastructure*’ to be ambiguous and should be amended. In line with planning requirements (NPPF para 56), GAL is committed to providing the infrastructure that is *necessary* to ensure the safe, efficient and secure operation of the airport.

GAL objects to Policy GAT1 (iv) as drafted - Proposed Amendment

3.6 GAL considers that in GAT1 (iv) the term ‘*maximised*’ should be replaced with ‘*secured*’ as it may not in all instances be reasonable or proportionate for the related benefits to be maximised.

Nationally Significant Infrastructure Projects - Proposed Policy Text Deletion

3.7 GAL objects to the last paragraph of the policy as NSIPs are not a matter for Policy GAT1. Policy GAT1 addresses proposed development that is within the remit of the LPA to determine. Applications for NSIP developments would be determined by the

Secretary of State through the Development Consent Order (DCO) process. GAL believes the last paragraph of Policy GAT1 should therefore be amended as follows:

“Where development to enable sustainable growth at Gatwick Airport will be a Nationally Significant Infrastructure Project, such as the use of the northern runway, i-iv above will be taken into account by the Council in preparing its Local Impact Report.”

3.8 Furthermore, GAL’s view is that a positive determination of the proposed Gatwick Northern Runway DCO would be highly likely to trigger a partial review of the Local Plan, and that Policy GAT1 will need to be reviewed taking account of the growth of the airport that would be facilitated by that project. However, until a decision on the DCO is known, any reference in the draft Plan to airport growth via an NSIP should reflect the policy contained in the policy document entitled “Beyond the horizon: The future of UK aviation-Making best use of existing runways” (“MBU”) published alongside the Airports National Policy Statement in 2018.

The requirement to safeguard land against development incompatible with a potential future additional runway: Proposed insertion to Policy GAT1

(GAL’s has made detailed comment on the national requirement for the safeguarding of land in its objection to Policy SD3 North Crawley Area Action Plan).

3.9 The Local Plan will have a strategic time horizon to 2035 and therefore the GAT1 policy should be aligned to current national policy which requires land at Gatwick to be safeguarded for the long term potential growth of the airport. GAL has suggested the insertion of new policy wording (as a final paragraph to the policy) in line with the currently adopted local Plan Policy GAT1, in order to reflect the need to safeguard land from development which would be *incompatible* with the potential future expansion of the airport to accommodate the construction an additional wide spaced runway.

Policy GAT2: Gatwick Airport Related Parking

4.1 GAL support draft Plan Policy GAT2 and the reasoned justification set out Paragraphs 10.16 to 10.19 of the draft Plan.

4.2 GAL support draft Plan Policy GAT3 as it appropriately restricts all future new and replacement airport-related parking to within the airport boundary, demonstrating the continued need for a sustainable approach to surface transport access to the airport.

Policy GAT3: Employment Uses at Gatwick

5.1 GAL support Policy GAT3 and reasoned justifications set out in paragraphs 10.21 and 10.22 as drafted.

5.2 GAL considers that Policy GAT3 in the draft Plan reflects the position promoted by GAL to include scope for land and buildings within the airport boundary to be used for non-aviation related uses.

Chapter 3: Sustainable Development

Policy SD3: North Crawley Area Action Plan

GAL Objection to Policy SD3: North Crawley Area Action Plan

6.1 GAL strongly objects to the proposed Strategic Policy SD3: North Crawley Area Action Plan which seeks to designate land to the north of Crawley and to the south and east of Gatwick Airport (including land currently safeguarded for a second runway under Policy GAT2 in the adopted Crawley Local Plan) in the form of an Area Action Plan (AAP).

6.2 GAL considers that the proposed Policy SD3 is contrary to and inconsistent with both current and emerging aviation policy and national planning policy.

6.3 GAL's position is that the current Policy GAT2 in the adopted Crawley Local Plan should be continued and that the land around Gatwick should remain safeguarded for an additional runway.

6.4 The following sections explain the historical background to the safeguarding of land at Gatwick for a new runway and the relevance of current and emerging aviation and national planning policy.

6.5 We then set out the grounds for objecting to Policy SD3 with reference to the national policy position and in light of GAL's Airport Master Plan published in 2019 and end with our conclusion.

Historical Background to Safeguarding Policy

6.6 There is a long history of safeguarding of land at Gatwick dating back to 2003. The policy position can briefly be summarised as follows:

Air Transport White Paper (2003)

6.7 The origins of the Government's requirement to safeguard land at Gatwick for a second runway derive from the 2003 Air Transport White Paper (ATWP).

6.8 In relation to Gatwick, the ATWP recognised that in 1979 the British Airports Authority had entered into a 40 year agreement with West Sussex County Council which prevented the commencement of the construction of a second runway at Gatwick before 2019. The Government concluded that it would be highly undesirable to overturn the legal agreement unless there was no alternative way to provide for the identified need for additional runway capacity. The ATWP concluded that alternative options did exist at Stansted and at Heathrow.

6.9 The Government nevertheless recognised the strong case for a second, wide spaced, runway at Gatwick, and given the uncertainty about whether the Heathrow runway option could be brought forward, it required that land should be safeguarded for a wide spaced runway and associated facilities at Gatwick for development after

2019 in the event that it became clear that the conditions necessary to support Heathrow could not be met.

Gatwick Interim Masterplan 2006 - defining the safeguarded land

6.10 Whilst the ATWP included an indicative plan of the land that may need to be safeguarded for the second runway, BAA undertook more detailed studies, as part of the preparation of its Gatwick 2006 Interim Master Plan, to refine the boundary of the land that would be safeguarded. Drawings 7 and 8 of the Interim Masterplan show the land to be safeguarded. It reflects a runway separation distance of 1,035m from the existing runway, which is the minimum separation needed for independent mixed mode operations, together with the need for the range of facilities that would be expected to be needed to support the operations of an expanded airport, including a third terminal and associated facilities between the existing and 2nd runway.

6.11 The area of safeguarded land was subsequently adopted in the Crawley Core Strategy (and referred to in Policy G2) and is now identified in the 2015 Crawley Local Plan (and referred to in Policy GAT2).

Current Aviation Policy

6.12 In 2011 the Government commenced the process of preparing a new policy framework for UK aviation. This led to a draft Aviation Policy Framework ('APF') being published in July 2012 and the final APF in March 2013. Section 5 relates to 'Planning' and explains that in preparing their local plans, local authorities are required to have regard to policies and advice issued by the Secretary of State. This includes the Aviation Policy Framework, to the extent it is relevant to a particular local authority area.

Paragraph 5.9 of the Aviation Policy Framework states:

“Land outside existing airports that may be required for airport development in the future needs to be protected against incompatible development until the Government has established any relevant policies and proposals in response to the findings of the Airports Commission, which is due to report in summer 2015.”

6.13 In late 2012, during the preparation of the APF, the Government also set up the Airports Commission ('AC'). Included within the AC's brief was the requirement to examine the nature, scale and timing of any requirements for additional airport

capacity to allow the UK to maintain its position as Europe's most important aviation hub.

The Airports Commission Process

6.14 In its Interim Report the AC concluded that there was a clear case for one net additional runway in London and the South East, to come into operation by 2030. The option of a second full length, wide spaced, runway at Gatwick was one of three options shortlisted for detailed study by the AC (alongside two different options for an additional runway at Heathrow).

6.15 The AC completed its work with the publication of its Final Report and recommendation to Government in July 2015. Whilst the AC recommended in favour of the North West Runway option at Heathrow, the option put forward by GAL was regarded as a credible option for expansion, capable of delivering valuable enhancements to the UK's aviation capacity and connectivity.

Airports National Policy Statement (June 2018)

6.16 The Government spent 18 months undertaking further work and studies to inform its view on the way forward and in October 2016 announced its preference for the Heathrow runway option recommended by the AC. Government did confirm at that time that the 2013 Aviation Policy Framework (APF) would remain the Government's policy document on all issues beyond the specific matter of an additional runway at Heathrow Airport, until such time as it is replaced by an Aviation Strategy.

6.17 In February 2017, Government commenced consultation on a Draft Airports National Policy Statement and in June 2018 the Government laid the final NPS before Parliament. It was designated by the Secretary of State for Transport on 26th June 2018. It is however, important to note four points:

- That the designated NPS looks ahead to 2030 (para 1.21) and its scope is limited to the provision of the third runway at Heathrow (para 1.40) – other Government policy on airport capacity and wider aviation issues are to be covered in government's emerging Aviation Strategy - 'Future of UK Aviation' strategy which looks ahead to 2050 (para 1.38) (see below).
- That all major airports in the south east of England are expected to be full by the mid 2030s and that four of the five main London airports will be full by the mid 2020s (para 2.12)
- That the policies set out in the 2013 Aviation Policy Framework still apply (NPS para 1.38)
- That the NPS is the subject of several legal challenges and is currently awaiting a judgement in the Court of Appeal. If the NPS is considered unlawful, depending on the grounds the Government may need to look again at alternative options, including a second runway at Gatwick.

In the process of preparing these representations, a judgment was issued in the Court of Appeal on Thursday 27th February that the designation of the Airports NPS is

unlawful and therefore has no legal effect. Whilst the Government confirmed it would not appeal the ruling, Heathrow Airport indicated it would seek leave to appeal to the Supreme Court. Therefore, it is not certain, at this moment, what will happen except for the ruling we have from the Court that the Airports NPS, as it currently stands has no effect. However, despite this ruling, the Judge's did not question the need case for additional runway capacity in the UK, rather they have given the Government the opportunity to reconsider the Airports NPS.

Emerging Government Policy

'Aviation 2050 - The future of UK aviation' (December 2018)

6.18 Alongside finalising the Airports NPS the Government also started to prepare a UK wide Aviation Strategy setting out a long term strategy to 2050 and beyond. In December 2018, the Government published its draft Aviation Strategy, "Aviation 2050: The Future of UK Aviation".

Whilst Government's forecasts show that demand for aviation will continue to grow in the period to 2050, the Government believes that:

"The partnership for sustainable growth which the government is proposing is a long term policy framework which will need to be flexible enough to respond to new information, developments and changing circumstances, while providing sufficient long term confidence for the industry and communities." (para 3.9)

6.19 In relation to whether there is a need for further runways, para 2.12 states that all major airports in the South East of England are expected to be full by the mid 2030s and that four out of five London airports will be full by the mid 2020s (para 2.12). Para 3.13 goes on to explain that the Government believes that any new framework for growth could accommodate additional runways beyond 2030 if a needs case is proven and suitable conditions are met in respect of sustainability. As part of this the Government proposes to ask the National Infrastructure Commission to include airport capacity in future national infrastructure assessments to determine whether there is a needs case for further runways. Paragraph 3.14 explains that if a need is identified, the Government has options for how to reach a decision on location. It states:

"At this stage the governments preferred approach is an NPS to set out the criteria but not name specific airports, so leaving it to industry to determine whether and when to bring forward applications."

6.20 In terms of safeguarding of land for growth, para 3.66 of the draft Aviation Strategy acknowledges that several airports currently safeguard land for future

developments which could be in a mix of airport, council and private ownership. Para 3.66 then goes on to state that:

“It is prudent to continue with a safeguarding policy to maintain a supply of land for future national requirements and to ensure that inappropriate developments do not hinder sustainable aviation growth” (para 3.66).

6.21 Paragraph 3.66 also refers to the fact that the National Planning Policy Framework has restated the Government’s commitment to “identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice”. It states:

“The government believes that this [the NPPF] provides sufficient guidance for local authorities to consider the future needs of airports and their associated surface access requirements, when developing local plans.”

6.22 It is clear therefore that emerging Government policy continues to support the need for the safeguarding of land around airports established historically by the ATWP and more recently by the Aviation Policy Framework. Government believes it is sensible to continue to safeguard land adjacent to airports so that sustainable aviation growth can be protected for future national requirements.

Other planning policy considerations in relation to safeguarding

National Planning Policy Framework (February 2019)

6.23 The National Planning Policy Framework (2019) requires transport issues to be considered from the earliest stages of plan making so that significant development should be focussed on locations which are or can be made sustainable. Paragraph 104 sets out that planning policies should:

“identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development”

Paragraph 104 e) states planning policies should

“provide for any large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements”

6.24 The NPPF is aligned with national aviation policy and reinforces the need to protect sites for large scale transport development and provide for their expansion. The robustness of Gatwick’s proposal for a second full length, wide spaced, runway

at Gatwick is evidenced by the Airport Commission's report, as is the criticality of further runway capacity.

GAL's Objection to Policy SD3

Removing safeguarding at Gatwick is inconsistent with and contrary to both existing and emerging Government Aviation Policy

6.25 The Council recognised in its Regulation 18 consultation draft local plan that, until the final Aviation Strategy is published, the Aviation Policy Framework 2013, makes it clear that land outside existing airports which may be required for airport development in the future needs to be protected against development which would be incompatible with the potential development of future runways. The final Aviation Strategy still has not been published and there are no other material factors that suggest that the Council's approach to safeguarding land should change.

6.26 Government policy on safeguarding remains unchanged unless and until the Government's 'Future of UK Aviation' strategy policy has been adopted. Claims that the national policy framework on aviation and airports has fundamentally altered since the current Crawley local plan lack any foundation; there has been no suggestion that safeguarding of land at Gatwick for a possible new runway is no longer required.

Removing safeguarding at Gatwick is inconsistent with and contrary to existing national planning policy.

6.27 The NPPF (para 104) makes it clear that local planning policies should provide for large scale transport facilities and furthermore should identify and protect sites which could be critical in developing national infrastructure. The difficulties in securing approval for airport expansion projects are well known, and to place additional burdens through removing long established safeguarding policy would impact the sustainability of development and is unnecessary, inappropriate and potentially damaging to the national and regional economy as well as the local economy.

Gatwick's commitment to and development of a second runway scheme was considered credible by the independent Airports Commission.

6.28 Gatwick Airport recognises that whilst the Airports National Policy Statement identified Heathrow as the preferred location for the next new runway in the south east in the period to 2030, it did not make any statement in relation to the safeguarding of land. The present policy position is therefore contained in both the existing the Aviation Policy Framework and in the emerging Aviation Strategy. However, in participating in the Airports Commission process and by being shortlisted as one of 3 possible sites for the next new runway, it was acknowledged by the Airport Commission that Gatwick presented both a plausible and a credible option for expansion – capable of delivering valuable enhancements to the UK's aviation capacity and connectivity. This confidence in Gatwick's capability was derived, to a

large extent, by the level of detailed design work undertaken to demonstrate that a second runway with associated facilities and surface access improvements could be adequately delivered at Gatwick. Moreover, the contention that GAL's plans for a second runway lack justification is without merit. As noted earlier, the safeguarded land policy position has its origins in the 2003 ATWP based on the information that was available at that time. Subsequently, GAL undertook a major consultation exercise in 2014 as part of the Airports Commission process at which time the expanded boundary was explained (Plan A page 60 GAL Report of Consultation July 2014).

6.29 The Gatwick Airport Masterplan 2019 recognises the need to safeguard land for a new runway at Gatwick in the longer term, and that the land currently safeguarded to the south of the existing runway is the only location where a new runway could be delivered. If that land is now allowed to be made available for other development, there would be no other equivalent or equally preferable option available for locating a new wide spaced runway at Gatwick. Removal of safeguarding would therefore severely compromise the Airport's ability to grow as planned in the longer term and reduces the Government's options for how best to make a decision on long-term need in the future (a specific point that was raised in paragraph 3.12 of the draft Aviation Strategy, December 2018) especially if that is likely to result in the need for a new runway in the South East after 2030.

Removing safeguarding policy would be at the very least premature

6.30 Even as far back as the ATWP (2003), the Government recognised the strong case for a second, wide spaced, runway at Gatwick, and given the huge uncertainty about whether the Heathrow 3rd runway option could be brought forward by 2030 as envisaged, especially so in the light of the Court of Appeal judgement, the land safeguarded at Gatwick for a wide spaced runway and associated facilities should be protected more so than ever. This uncertainty surrounding delivery of the new 3rd runway at Heathrow remains and for this reason, safeguarded land at Gatwick should not be compromised.

6.31 Whilst the Airports Commission finally recommended in favour of the North West Runway option at Heathrow, it concluded that the option put forward by GAL was a credible option for expansion, capable of delivering valuable enhancements to the UK's aviation capacity and connectivity. Land safeguarded at Gatwick must therefore

continue to be protected should Government policy on Heathrow change in light of the requirements of the Court of Appeal ruling.

6.32 Any decision that compromises the safeguarded land at Gatwick until the new runway at Heathrow is delivered or until the Government categorically state that it is no longer required for long term safeguarding is premature.

The Council states that the Area Action Plan approach outlined in Policy SD3, rather than identifying allocations in this Local Plan, is considered to be pragmatic.

6.33 The Councils approach is confusing, wholly inappropriate and is not pragmatic. Indeed, the approach outlined in Policy SD3 generates confusion and uncertainty for all over the future of the land within the safeguarded area especially in light of the Government's clear position on safeguarding and the Council's intention to commence work on the AAP only after the Plan has been adopted.

6.34 The Council acknowledges that making a decision as to whether any of the AAP land is available to meet some of the Borough's housing need (or for that matter, any other land use) critically relies on understanding the appropriate noise contours to be applied in the future, but that is not possible until the extent of future growth at Gatwick has been established (paragraph 3.27). This is absolutely correct and underlines exactly why the approach is not pragmatic, it simply creates uncertainty until future growth at Gatwick is fully understood. The prudent course would be to continue with safeguarding in accordance with Government policy until such time that there was a policy change and there is certainty as to the future of the Heathrow North West Runway and the future growth of Gatwick.

The land currently safeguarded at Gatwick Airport must not be included in the 'Area of Search for a Western Link Road'

6.35 Until Government confirms its position regarding safeguarding of land at airports through the Aviation Strategy, the land safeguarded at Gatwick Airport must continue to be protected from inappropriate development which would include the Crawley Western Link Road. This strategic road development is required to deliver the development planned in the Local Plan. It should therefore be delivered on land where availability is certain during the Plan period. This is not true of safeguarded land at Gatwick.

The land currently safeguarded at Gatwick Airport is not required to satisfy employment land needs

6.36 The draft Plan has identified a shortfall in employment land of approximately 21 hectares through the Plan period up to 2035 and therefore employment land needs will be considered alongside the requirement for safeguarding for future airport expansion under an Area Action Plan. GAL believe that the Councils unmet employment land requirements can be sufficiently satisfied elsewhere in the Borough

or in adjacent districts which would not prejudice the land which is currently safeguarded by national policy.

6.37 GAL considers that existing employment sites in the borough could be used more efficiently by means of intensification, redevelopment and design improvements. Vacant employment sites do already exist within the borough, and the Manor Royal Economic Impact Study (2018) clearly identifies significant scope for accommodating new development across a number of sites in this main employment land area.

6.38 It is crucial that the Council uses Article 4 Directions to prevent the further loss of employment sites to residential development via Permitted Development Rights. The Council has continued to lose valuable employment sites due to the conversion of office buildings to residential accommodation via the prior approval process, and the draft Plan should proactively seek means to resist such loss of its existing employment land stock.

6.39 Local planning authorities are bound by the statutory Duty to Cooperate when making plans and especially on strategic matters that cross administrative boundaries. GAL considers that employment land opportunities could be further realised through the Council's Duty to Co-operate and by working with the adjoining authorities of Mole Valley, Tandridge and Reigate and Banstead. The Horley Strategic Business Park has been allocated with the specific purpose of assisting Crawley Borough Council in meeting its unmet employment needs. This presents a significant opportunity for the Council to work with Reigate and Banstead Borough Council to jointly deliver a large-scale employment site and other similar opportunities should be explored. Through positive duty to cooperate arrangements Crawley's unmet employment need could also be satisfied in part within the wider North Western Sussex Area. The forthcoming Burgess Hill 'Hub' for instance could offer Crawley a potential option to meet its unmet industrial land needs.

6.40 If land currently safeguarded was released for employment land and development that is incompatible with the development of a future runway were to be realised this would mean the land would potentially be lost for potential airport expansion. In fact, the Council's proposed removal of the safeguarded land would mean the loss of the significant positive employment opportunities that would arise from such a nationally significant infrastructure scheme being realised, which would not only be detrimental to the economy of Crawley but also to the economies of their neighbouring local authorities and the wider Gatwick Diamond.

6.41 The national economic benefits of growing aviation are stated in the Draft Aviation Strategy and in the NPS. These national economic benefits are key to why the Government has retained control over airports policy at a national level and why a local AAP is not the right approach for considering the wider economic direction of the draft Plan. The proposed approach in the draft Plan to remove the safeguarding and the subsequent potential loss of land that could accommodate a further runway at Gatwick is likely to cause considerably greater economic damage to the region and to the nation in the long term than if the land is unavailable for other employment development especially if other short and medium term options exist. If the consequence of this is that some of the borough's unmet employment land need is jointly delivered in neighbouring authorities through the Duty to Cooperate then that

position is considered by GAL to a pragmatic and acceptable approach for the draft Plan to adopt.

6.42 GAL believes that the draft Plan has not fully recognised the significant employment opportunities at Gatwick Airport. GAL considers that there is significant potential for the further use of both buildings and land at the airport to both widen the employment uses at the airport and potentially assist with meeting the Council's need for additional employment space. Gatwick is a highly sustainable location with easy access to central London and Brighton and more locally via local, regional and national train and bus networks, which will continue to be improved significantly within the Plan period to 2035.

Gatwick's Master Plan provides an appropriate level of detail on the land required for future airport expansion

6.43 The Gatwick Airport Master Plan 2019 provides illustrative plans (Plans 20, 21, 22 on pg. 168-170) of the land required for a future additional runway. The Airports NPS includes at Annex B a drawing of the proposed Heathrow third runway scheme which has been prepared to a level of detail that is comparable to GAL's additional runway plan. GAL considers that if such level of detail is sufficient for use in the NPS, it must be sufficient for current safeguarding purposes. Furthermore, the NPS does not support a specific detailed scheme and much of its evaluation of comparisons was based on illustrative schemes.

6.44 GAL undertook an extensive consultation exercise during its submissions to the Airports Commission at which point interested parties including the Council had the opportunity to question the amount of detail or the range of options considered. Safeguarding is undertaken only when there is a possible long term need in the national interest and before plans can be finalised for an extensive and robust consultation process. GAL considers that the NPS / DCO process which requires consultation on illustrative plans would be the appropriate time for a more detailed analysis of land uses associated with a potential future runway to be undertaken.

Conclusions:

6.45 GAL strongly objects to the inclusion of Strategic Policy SD3: North Crawley Area Action Plan and requests that the current adopted policy regarding safeguarding, as set out in Policy GAT2: Safeguarded Land in the adopted Crawley Local Plan is continued in the emerging Local Plan.

6.46 Government is yet to conclude its Aviation Strategy and there has been no suggestion by Government that safeguarding of land at Gatwick for a possible runway is no longer needed. On the contrary, it remains a requirement of national policy to safeguard land for future airport expansion and it would be contrary to Government policy in relation to national infrastructure to remove safeguarding. Therefore, the approach should not be to promote the preparation of the AAP on adoption of the Local Plan; instead, the correct approach should be for the Council to reflect the current Government position on safeguarding land at the airport by continuing to apply the

approach set out in Policy GAT 2 in the adopted Local Plan and to commit to a Local Plan review should Government policy change.

6.47 GAL considers that it would be imprudent of the Council to discontinue with the standalone safeguarding policy given that the development consent order for the Heathrow third runway project has not yet been made, that the scheme is not clear of legal challenges, and it has not yet been demonstrated that the project is going to proceed, is deliverable or even buildable. This means that the Government may in the future invite Gatwick (and other airports) to bring forward proposals for an additional runway. To not continue to apply the requirements of adopted Policy GAT2 compromises the safeguarded land at Gatwick and until the new runway at Heathrow is confirmed through grant of a DCO and then implemented, the lifting of safeguarding from the draft Plan is plainly premature.

6.48 GAL strongly consider that the currently adopted Policy GAT2 needs to be continued in the draft Plan to protect the safeguarded area from development that would materially add to the challenges that come with bringing forward nationally significant infrastructure and add to the complexity, cost and timescale for efficiently and speedily preparing a Development Consent Order application, securing consent, and subsequently bringing the project into operation.

Chapter 5 Design and Development Requirements

Policy DD6: Aerodrome Safeguarding

7.1 GAL support the need for a standalone policy in the draft Plan on Aerodrome Safeguarding but GAL considers the need for amendments to strengthen and clarify the supporting introductory text and wording of Policy DD6.

Paragraph 5.46: Proposed Amendment

7.2 Aerodrome safeguarding differs to the principle of safeguarding land for a possible additional runway to the south of Gatwick Airport. Instead, it relates to how a development could impact on *aerodrome and flight* safety. Aerodrome safeguarding assesses, for example, the height and design of proposed development or construction equipment that might be used (such as cranes) which could create a potential risk to ~~the airport~~ *safe flight operations* through impacts on ~~radar~~ *navigational aids, Instrument Flight Procedures (IFPs), infringement of the Obstacle Limitation Surfaces (OLS) and creating a 'physical' obstacle or the creation* of building induced turbulence. It also considers the potential risk to aviation created by large landscaping schemes, ~~lighting designs and new water bodies which could attract birds hazardous to aviation~~ *SUDS, the creation of wetlands and water bodies and building design such as the incorporation of large areas of flat/shallow pitched roofs. All have the potential to attract birds hazardous to aviation and in turn increase the birdstrike risk to the aerodrome. Other factors to be taken into consideration are lighting design and renewable energy schemes to ensure that they will not be distracting to pilots and ATC and there is no impact on radar or glint and glare. The Public Safety Zone (PSZ) also needs to be taken into consideration as this limits any development within that zone.*

Policy DD6 Aerodrome Safeguarding: Proposed Amendment

7.3 Development will only be supported if it is consistent with the continued safe operation of Gatwick Airport. Where required, the Local Planning Authority will consult with the ~~airport~~ *aerodrome* operator and/or the operator of technical sites (e.g. radar stations) on relevant proposals in the aerodrome safeguarded areas. Statutory consultation responses may require that restrictions are placed on the height or detailed design of buildings, structures or other developments to avoid impacts on the ~~airport-aerodrome~~, including those relating to navigational aids, *Instrument Flight Procedures (IFPs)* or on developments which may increase bird strike risk, create building-induced turbulence or including lighting that could pose a hazard to the safe operation of the ~~airport~~ aerodrome. Proposals that cannot be mitigated to the satisfaction of the statutory consultees are considered to be a hazard to aircraft safety and will be refused.

Policy DD7: Advertisements

8.1 GAL supports the inclusion of Policy DD7 (e) as it identifies the important need for aerodrome safeguarding to be considered.

Chapter 16 Environmental Protection

Policy EP4: Noise and Development

9.1 GAL broadly supports Policy EP4 but considers the policy requires minor amendments.

9.2 Policy EP4 as drafted does broadly promote the achievement of the objective of preventing new noise sensitive development in areas with an unacceptable noise impact. We therefore broadly support the position the draft Plan adopts in relation to noise when considering an application or an allocation of a site for a noise sensitive development, subject to our further comments below regarding the need for noise mitigation to be met by the developer and for the correct technical noise thresholds to be applied in Policy EP4.

GAL Comments:

9.3 Whilst GAL supports the inclusion of a policy in the draft Plan that specifically considers noise generating and noise sensitive development and the inclusion of a technical 'Noise Annex' that explains how the policy will be applied in relation to sound levels from transport sources, we do consider that the specific values applied relating to aircraft noise are not consistent with the evidence from research.

9.4 GAL suggest that the noise threshold levels align with recent government policy for LOAEL and significant community annoyance specifically for aircraft noise. Government guidance is clear that LOAEL for aircraft noise is Leq 16-hour day 51dB and Leq 8 hour summer night 45dB (Consultation Response on UK Aviation Policy: A framework for balanced decisions on the design and use of airspace, October 2017, Section 2 paragraph 2.72). It is GAL's view that these values should be accurately reflected in the draft Plan.

9.5 Since 2014 noise policy has been interpreted by various local planning authorities, a public inquiry inspector, the Mayor of London and the Secretary of State for Transport, in the following applications for new airport infrastructure:

- Birmingham International Airport Runway Extension, 2014;
- London City Airport Development Plan, 2015-2016; and
- Cranford Agreement Secretary of State's Decision, February 2017.

9.6 In the Cranford case the inspector noted *'the parties do not differ about the SOAEL for aircraft noise: it is 63dB LAeq, 16 hours (or its equivalent if other metrics are considered). Noise impacts at that level require to be avoided.'*

9.7 However, the draft Plan Policy EP4 part 'A. Noise Sensitive Development' (para 4) states:

'For aviation transport sources the Unacceptable Adverse Effect is considered to occur where noise exposure is above 60dB LAeq 16hr.'

9.8 GAL note this policy wording is under the heading 'Noise Sensitive Development', and whilst we would support planning policies to ensure that new housing is not permitted above this level of aircraft noise, we do not agree that such levels are

unacceptable in a broader sense. GAL considers that, in line with best planning practice, the draft Plan should continue to promote policies which seek to locate new noise sensitive development in locations removed from existing noise generating sources, such as the airport.

9.9 The draft Policy EP4, under the heading 'A. Noise Sensitive Development' (para 2), states:

'Noise sensitive uses proposed in areas that are exposed to significant noise at the Lowest Observable Adverse Effect (LOAEL), or the Significant Observable Adverse Effect (SOAEL) from existing or future industrial, commercial or transport (air, road, rail and mixed) sources will be permitted where it can be demonstrated that good acoustic design has been considered early in the planning process, and that all appropriate mitigation, through careful planning, layout and design, will be undertaken to ensure that the noise impact for future users will be made acceptable....'

9.10 The Noise Policy Statement for England (NPSE), at paragraph 2.24, suggests that reasonable steps to mitigate noise impacts should be considered above LOAEL, not above SOAEL. GAL therefore propose the following amendment to the wording of Policy EP4;

Policy EP4 - Proposed Amendment

'Noise sensitive uses proposed in areas that are exposed to significant noise ~~at~~ above the Lowest Observable Adverse Effect (LOAEL), or ~~at~~ the Significant Observable Adverse Effect (SOAEL) from existing or future industrial, commercial or transport (air, road, rail and mixed) sources will be permitted where it can be demonstrated that good acoustic design has been considered early in the planning process, and that all appropriate mitigation, through careful planning, layout and design, will be undertaken to ensure that the noise impact for future users will be made acceptable....'

9.11 GAL supports the principle to avoid new housing in areas of excessive aircraft noise, and to ensure that if new housing must be permitted within the airport's LOAEL zones it should only be permitted if appropriate mitigation is included within the design, as indicated in the ProPG: Planning & Noise – New Residential Development (May 2017).

9.12 GAL considers that Policy EP4 should make it explicitly clear that the costs associated with the noise mitigation measures required for making a proposed noise sensitive development acceptable for future users in terms of the existing noise levels or known potential future noise contours are a cost to be fully met by the developer. GAL therefore requires the insertion of the following policy wording to Policy EP4 to form the final paragraph under part D. Mitigating Noise Impact

'All responsibility for undertaking appropriate mitigation lies with the planning applicant to ensure that the impacts of existing noise or known potential future noise sources are acceptable on the use being applied for by the applicant.'

Crawley Local Plan Noise Annex

9.13 GAL notes that paragraph 4.1.9 of the Noise Annex refers to aviation noise and repeats the incorrect levels for LOAEL and SOAEL and which are inconsistent with current government guidance and therefore should be revised.

9.14 Noise Annex Table 1 states the proposed LOAELs, SOAELs, Unacceptable Adverse Effects Levels. New housing in areas above LOAEL (Leq 16-hour day 51dB and Leq 8 hour night 45dB) should therefore only be permitted if adequate mitigation is included in the design. Professional Planning Guidance: Planning & Noise – New Residential Development (May 2017) is referred to in government guidance (PPG-Noise Paragraph: 015 Reference ID: 30-015-20190722 Revision date: 22 07 2019, <https://www.gov.uk/guidance/noise--2>) and it would therefore be appropriate for the draft Plan to reflect such levels and guidance in the Noise Annex Table 1, including the Lmax levels which are relevant for aircraft noise.

9.15 The Lmax levels quoted in the Noise Annex also appear to have no basis. For example, the SOAEL Lmax during the day is stated as 70dB whereas at night it is a range of 60-82dB. It cannot be the case that higher levels at night than during the day would be appropriate for new housing development.

9.16 Paragraph 4.1.6 of the Noise Annex refers to Figure 1 noise contours for a wide spaced second runway. It also notes that the figure will be updated by the Council should these contours be updated. GAL welcomes the commitment to update these as airport proposals come forward such as the Northern Runway proposal.

9.17 Paragraph 5.5 of the Noise Annex under the heading Noise Impact Assessment notes:

'In all cases, the best practical means (or 'all reasonable steps') of mitigation will be required to mitigate noise impact to an appropriate level, and in liaison with Crawley Borough Council Environmental Health'.

Whilst Best Practical Mean is defined in noise related law, it is not clear what the 'all reasonable steps' test entails with regard noise mitigation and this needs further clarification in the draft Plan.

Technical Appendix: Supporting Evidence in Relation to Noise from Transport Sources.

9.18 The Technical Appendix does not provide direct or adequate support for the values given in Table 1. The technical sources of data detailed in the supporting evidence has been superseded and therefore requires updating, for example, Section 5 Noise from Aviation Transport Sources does not refer to the most recent government consultation on aviation strategy (e.g. Consultation Response on UK Aviation Policy: A framework for balanced decisions on the design and use of airspace, October 2017, Section 2) that clearly state for example government policy on LOAEL values.

Chapter 8: Infrastructure Provision

Policy IN1: Infrastructure Provision

10.1 Gatwick supports strategic policy IN1 Infrastructure provision and specifically the permitted development of infrastructure, which relates to Gatwick's growth ambitions. GAL considers the Councils approach to developer contributions through CIL and s106 is appropriate, providing that s106 agreements accurately reflect the nature and challenges of the development consistent with the NPPF tests.

Policy IN2: Location and Provision of New Infrastructure

11.1 Gatwick generally supports strategic policy IN2 and the provision of new or improved infrastructure in appropriate locations where the facilities are required and the provision of community facilities alongside housing. GAL welcomes paragraph 8.13 identifying the need to support the development of transports hubs.

Chapter 9: Economic Growth

Policy EC1: Sustainable Economic Growth

GAL object to Policy EC1 as drafted.

12.1 GAL object to new employment development on land currently safeguarded by national policy for future potential airport expansion. (*GAL's has made comment on employment land delivery in its objection to Policy SD3 North Crawley Area Action Plan*).

12.2 The draft Plan has identified a shortfall in employment land of approximately 21 hectares through the Plan period up to 2035 and therefore employment land needs will be considered alongside the requirement for safeguarding for future airport expansion under an Area Action Plan – proposed Policy SD3. GAL strongly disagrees with this proposal in the draft Plan and believe that the Councils unmet employment land provision can be sufficiently satisfied by other planning mechanisms such as article 4 directions or the duty to co-operate and which would not prejudice the land which is currently safeguarded by national policy.

12.3 GAL considers that existing employment sites in the borough could be used more efficiently by means of intensification, redevelopment and design improvements. Vacant employment sites do already exist within the borough, The Manor Royal Economic Impact Study (2018) clearly identifies significant scope for accommodating new development across a number of sites in this main employment land area.

12.4 Local planning authorities are bound by the statutory Duty to Cooperate when making plans and especially on strategic matters that cross administrative boundaries. GAL considers that employment land opportunities could be further realised through the Councils Duty to Co-operate and by working with the adjoining authorities of Mole Valley, Tandridge and Reigate and Banstead. The Horley Strategic Business park has been allocated with a specific purpose of assisting Crawley Borough Council in meeting its unmet employment needs and it presents a significant opportunity for the Council to work with Reigate and Banstead Borough Council to jointly to deliver a large scale employment site. Through positive duty to cooperate arrangements Crawley's unmet employment need could also be satisfied in part within in the wider North Western Sussex Area.

12.5 The proposed approach in the draft Plan to remove the safeguarding and the subsequent loss the employment opportunities associated with a potential future NSIP at Gatwick is likely to be of considerably greater economic damage to the catchment of Crawley, than the economic benefits of delivering the employment land burden in during the lifetime of the Plan.

Policy EC2: Economic Growth in the Main Employment Areas

13.1 GAL specifically objects to the further development of employment areas, (such as Lowfield Heath), on the land currently safeguarded by national policy for a potential future runway at Gatwick Airport. (*GAL has made comment on employment land delivery in its objection to Policy SD3 North Crawley Area Action Plan*).

13.2 GAL notes the recognition in the draft Plan of the strategic importance of the airport as a Main Employment Area in the development and economic growth of Crawley and the wider sub region. However, GAL believes that the draft Plan has not fully recognised the significant employment opportunities at Gatwick Airport. GAL considers that there is greater potential for the further use of both buildings and land at the airport to widen the employment uses at the airport and potentially assist with meeting the Council's needs for additional employment space

Policy EC6: Visitor Accommodation

14.1 GAL supports that visitor accommodation outside of the airport boundary will only be permitted where it can be demonstrated that proposals will not be serving visitor needs associated with travelling to and from the airport and or related to off airport car parking.

14.2 However, GAL objects to the requirements in Policy EC6 for new visitor accommodation within the airport boundary to be required to undertake the sequential test, and accordingly seeks amendments to the wording of the policy and reasoned justification.

14.3 GAL's representation to Policy EC6 therefore:

- Presents the evidence that hotels on airport serve a particular airport passenger need, which is supported by an Airport-Related Employment Land Study being carried out on GAL's behalf by Lichfields.
- Acknowledges the provisions of the NPPF which defines hotels as a town centre use but identifies that it is clear that hotels serving the Airport are more sustainable by being at the Airport;
- Justifies therefore the exclusion of hotels at the Airport from the sequential test.

GAL Comments on Policy EC6 Visitor Accommodation

14.4 Policy EC6 of the draft local plan provides that hotel and visitor accommodation will be supported in Crawley Town Centre, but where hotel development is proposed outside of the Town Centre, it will be necessary to demonstrate through the use of the sequential test, that no sequentially preferable sites are available. As it stands, this policy test would apply to any hotel proposal that came forward at Gatwick Airport.

14.5 GAL objects to proposed Policy EC6 because there is clear evidence that hotels on-airport serve a particular airport-related passenger need and that this need is best served by being located within the airport boundary. Clearly, the NPPF identifies hotels as a main town centre use. However, local plans should provide a positive vision for each area which for Crawley includes Gatwick Airport.

14.6 A local policy that requires hotel proposals meeting an on-airport need to be subject to a sequential approach (and thereby make it more difficult and/or less certain to provide airport-related hotel accommodation on or close to Gatwick) is not consistent with the NPPF taken as a whole in that it would not be:

- Planning positively to meet development needs (para 11) or helping build a strong, responsive and competitive economy by ensuring that sufficient land of

the right types is available in the right places to support growth, innovation and productivity and coordinating the provision of infrastructure. (para 8)

- Taking account of local business needs and wider opportunities for development (para 80)
- Recognising and addressing the specific requirements of different sectors (para 82)
- Addressing transport issues, including:
 - Ensuring patterns of movement are integral (para 102);
 - actively managing patterns of growth, by focusing significant development on locations which are or can be made sustainable by limiting the need to travel (para 103);
 - supporting an appropriate mix of uses across an area and within larger scale sites to minimise the number and length of journeys needed (para 104 a);
 - have policies prepared with the active involvement of other transport infrastructure providers and operators, so that strategies and investments for supporting sustainable transport and development patterns are aligned (para 104 b); and provide any large-scale transport facilities that need to be located in the area (including airports) and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy (para 104 e).

14.7 The Aviation Policy Framework 2013 (APF) (para 1.20) describes airports as being “cities in themselves, creating jobs and fuelling opportunities for economic rebalancing in their area”. The APF also sets out that airports act as focal points for business development and employment (para 1.22). Airport-related hotel provision has a role to play to meet this objective.

14.8 Taken as a whole, it is clear that whilst the NPPF identifies hotels as a main town centre use and seeks to have the sequential approach applied, this provision sits alongside other policy requirements that, if there is an acknowledged need for hotel provision to meet the needs of a specific airport, justify a local policy approach that supports the provision of new hotel accommodation at that airport, with benefits to sustainability. The draft Plan policy implicitly recognises the need for a nuanced approach in its approach to hotel provision at Manor Royal which allows for hotels in the Main Employment Area where it is demonstrated that the development will cater specifically for the business needs of Manor Royal.

14.9 In connection with Gatwick’s proposed Northern Runway Project GAL has commissioned Lichfields to carry out a study of Airport-Related Employment Land requirements, associated with the current Northern Runway Project growth plans. This study comprises:

- Defining a Functional Economic Market Area (FEMA) – that is defining an area where demand for hotel space is currently focused and may be focused in the future.
- Identifying a ‘current state’ picture of where hotel activity is sited and the amount of land it occupies – on and off the airport campus. Key to this exercise was

quantifying the number of hotels and hotel beds associated with the airport and the degree of that relationship as an airport-related employment use.

- Calculating a ‘future state’ – that is whether there is future demand for hotels, associated with the future growth of the airport, as well as whether there is a need for on airport hotels. This exercise included a review of market trends and benchmarking of hotel provisions at other comparable airports.

14.10 Although at the time of preparing this representation the study is still to be fully completed the evidence gathered already confirms:

- **Hotels serving the needs of airport users are airport-related**

14.11 Hotels located within the Gatwick Airport Boundary and in close proximity to the airport - are an airport-related employment use. They form an integral part of Gatwick’s operational requirements, serving the needs of a wider range of airport users, from passengers and aircrew using the airport to airport contractors and business users attending business events at the airport. This reflects the APS finding that Airports are “cities in themselves”.

- **Airport users prefer an on-airport hotel location**

14.12 The closer a hotel is to the airport, the greater the relationship between the hotel and the airport (that is, the proportion of hotel customers who are airport users), and this demand is at its greatest for hotels within the Gatwick Airport Boundary. Whilst there is also clear take-up of off-airport hotels by airport passengers, this is less than if the hotel is on or in close proximity to the airport, linked by an airport bus service. Demand significantly drops away the further away the hotel is to the airport.

- **Accessibility is important for airport related hotels:**

14.13 The shorter the transport connection, being the travel time by car or by public transport to the hotel, the greater the relationship between the hotel and the airport (the proportion of hotel customers that are airport users). There is a growing trend for terminal-linked hotels at other comparable airports. The availability of direct transport links (either public transport and airport shuttle service) is also critical, if an off-airport location is to hold an advantage over an on-airport location. However, on-airport hotels enable customers to walk to check-in facilities within ten minutes, which is unlikely to be possible even with good public transport links.

- **There is demand for a certain type of airport-related hotel:**

14.14 Airport users typically seek a certain type of airport-related hotel. These hotels are typically bigger (greater average room size, providing availability and choice), are hotels rather than guesthouses, and are often 4 star and above.

Current work is indicating that future growth at Gatwick – with or without the Northern Runway Project – will generate additional demand for hotel accommodation for users of the Airport. This is a development need for which the Local Plan should provide a positive response that recognises the patterns of travel and supports the operation of the Airport.

14.15 Gatwick has an ambition to actively provide for its future hotel needs to support its growth. Sites within the Gatwick Airport Boundary are the preferred location for any future hotel provision. An on-airport location will support Gatwick’s role in the local and

national economy, its operational requirements, and will also meet the needs of airport users (by way of proximity, accessibility and type of airport-related hotels required) – as demonstrated by the Airport-Related Employment Land Study. As such, GAL strongly objects to a policy that makes meeting this need more difficult, could result in less effective and sustainable outcomes (in the form of extra transport trips). As an alternative, GAL requests that the draft Plan includes a policy that excludes on-airport hotels from the sequential text and makes explicit provision for them.

14.16 GAL has reviewed the policy approach at other airports and identified a number of examples where new hotel provision on-airport is specifically provided for by local plan policy without requiring proposals to be assessed against application of the sequential approach. These include at Stansted, Luton, Manchester and Southend.

Proposed Amendments to Policy EC6 and Reasoned Justifications

14.17 GAL objects to new visitor accommodation within the airport boundary being subject to a sequential test where a planning application is required. Therefore, GAL proposes that the policy text is amended:

Visitor Accommodation supporting text - Proposed Amendment

9.69 Crawley is home to a number of hotels and other forms of visitor accommodation. These are located throughout the borough but are particularly concentrated in the Town Centre and at Gatwick Airport. Hotels are identified by the NPPF as a main town centre use, and as such should be located in sustainable town centre locations in the first instance.

9.70 a study of Airport-Related Employment Land has confirmed that hotels located within the Gatwick Airport Boundary serve a particular operational airport need (by passengers, aircrew and other airport users) and that this need is best served by being at the airport.

9.70 Hotels can also provide supporting facilities for Manor Royal, but it will also be necessary to demonstrate that the development will support the business function of Manor Royal, particularly given the evidenced business land supply constraints in Crawley and the need to maximise the use of the Main Employment Areas for business-led economic growth.

9.71 Local Plan Policy GAT2 outlines that the provision of airport-related parking will only be permitted within the Gatwick Airport boundary and must be justified by a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport. This applies to the provision of vehicle parking at hotels.

Policy EC6 - Proposed Amendment

'Hotel and visitor accommodation will be supported in the Town Centre *and within the Gatwick Airport Boundary.*

Where hotel development is proposed outside of the Town Centre *and outside of the Gatwick Airport Boundary*, it will be necessary to demonstrate, through the use of the sequential test, that no sequentially preferable sites are available.

Where hotel and visitor accommodation is proposed in Manor Royal Main Employment Area, this will be permitted where it is demonstrated that the development will cater specifically for the business needs of Manor Royal, including through the provision of business support facilities and staff amenities as per the requirements of Local Plan Policy EC3 (Manor Royal).

Where new hotel and visitor accommodation is located outside of the Gatwick Airport Boundary (in off-airport locations), parking provision shall be solely for the use of staff and guests in residence of the development and shall not be block parked or used by for any other purpose, including as off-airport car parking'.

Reasoned Justification - Proposed Amendment

9.72 Hotels represent a main town centre use, and support Town Centre vitality and viability. The Town Centre is the preferred location for hotel and visitor accommodation, as it is here where linkages with shops, restaurants and other main town centre uses can best be facilitated. *Gatwick Airport is the preferred location for hotels serving an operational airport need.* Where hotel and visitor accommodation is proposed in edge-of-centre or out-of-centre locations *(with the exception of on-airport locations)*, it will be necessary for applicants to demonstrate that the requirements of the NPPF sequential test are satisfied.

9.73 Where hotel and visitor accommodation is proposed in Manor Royal, applicants will be required to demonstrate how the development will provide business facilities and amenities for Manor Royal staff to ensure that the development supports the principal business function of Manor Royal. Given the recognised absence of a dedicated business hub at Manor Royal, there is scope for a hotel development, if carefully planned to incorporate an appropriate range of business-supporting facilities, to provide the business hub function that is currently lacking. To steer the type of business supporting facilities that may help to achieve this, applicants should refer to Local Plan Policy EC3 and its supporting text. The onus will be on the applicant to incorporate the necessary features into their scheme that would clearly demonstrate the complementary nature of the proposal to Manor Royal. Applicants are also encouraged to liaise with the council and Manor Royal BID at an early stage to scope the type of facilities needed to enable any hotel proposal to appropriately support the Manor Royal business function.

9.74 Airport parking should be located within the airport boundary and, therefore, Policy EC4 contains the appropriate text to ensure consistency with the approach of Local Plan Policy GAT2.

Chapter 12 Housing Delivery

Policy H3d: Upward Extensions - Proposed Minor Amendment

15.1 GAL support broadly Policy H3d in the requirement for new upwards extensions to have been agreed with Gatwick Airport to ensure that the proposal complies with the safety needs of Aerodrome Safeguarding. However, GAL do consider the policy requires a minor amendment at Policy H3d (i)

Policy H3d (i) - Proposed Policy Amendment:

GAL request the following amendment

'..... Gatwick Airport Ltd in relation to aerodrome safeguarding & [NATS En Route LTD in relation to technical sites safeguarding](#)'.

Policy H8: Gypsy, Travellers and Travelling Showpeople Sites

GAL object to Policy H8 as drafted.

16.1 Gatwick supports the need for the inclusion of a policy in the draft Plan which makes provisions for the allocation of a Gypsy, Traveller and Travelling Show People Sites.

16.2 However, Policy H8 as drafted is considered by GAL to be in conflict with both the national policy requirement to safeguard land around the airport, the Noise Policy Statement for England and the proposed Policy EP4 Noise of the draft Plan.

GAL Comment:

16.3 GAL submit that any form of new residential accommodation and housing including Gypsy, Traveller and Traveller Showpeople sites should not be permitted (this objection extends to include granting of temporary permissions) on the land currently safeguarded by national policy for future airport expansion as this could compromise the expedient delivery of a nationally significant infrastructure scheme in the national interest. *(GAL provides significant details of the need for land to be safeguarded from incompatible forms of development such as housing in its representation objecting to Policy SD3).*

16.4 In addition and central to GAL's objection to Policy H8 is that the noise thresholds for permanent and temporary Gypsy, Traveller and Traveller Showpeople sites, as proposed in Policy H8 point (a) are set at thresholds that are too high and as such will fail to ensure that the future sites will offer suitable living environments for the travelling community.

16.5 The following noise criteria are identified in Policy H8 criterion (a):

Gypsy, Traveller and Travelling Showpeople Sites

| | |
|--|---|
| Permanent Sites | Not permitted in locations exposed to existing or predicted noise levels >57dBA |
| Long Term Temporary Sites (up to one month) | Not permitted in locations exposed to existing or predicted noise levels >60dBA |
| Temporary Sites | Not permitted in locations exposed to existing or predicted noise levels >66dBA |

16.6 GAL is unclear about the distinction between ‘*long term temporary sites of up to one month*’ and ‘*temporary sites*’ but considers that the noise thresholds for any temporary site as is proposed in Policy H8 will lead to unacceptable impacts on occupants of any such sites. GAL’s view is that the effects of noise on health and quality of life (for example sleep disturbance) occur from short term exposure as well as long term exposure.

16.7 Policy EP4 of the draft Plan states new housing above the unacceptable noise level of Leq 60dB for aircraft noise should not be permitted. It goes on to say that new housing can be developed in noise levels above the Lowest Observable Adverse Effect Level (LOAEL) or Significant Observable Adverse Effect Level (SOAEL) ‘*where it can be demonstrated that a good acoustic design has been considered early in the planning process, and that all appropriate mitigation, through careful planning, layout and design, will be undertaken to ensure that the noise impact for future users will be made acceptable*’. Design measures to mitigate aircraft noise are available for new build housing, such as property sound insulation however, unlike ‘bricks and mortar’ housing, it is not possible to attenuate the noise in caravans, mobile homes and prefabricated accommodation to the same degree. This means that the noise thresholds need to be lower for such accommodation.

16.8 The national policy position is to avoid significant adverse impacts from noise. It also explains that at noise levels from air traffic sources should be mitigated and reduced to a minimum to avoid such significant adverse effects. GAL therefore considers that Policy H8 should reflect this position and that new traveller sites should not be permitted above the LOAEL, which in government policy is Leq 16hr 51dB for daytime and Leq 8 hr 45dB for night-time for aircraft noise in order to ensure residents do not experience adverse effects from noise.

Policy H8 - Proposed Amendment of Policy H8 (a):

“Policy H8

.....

Criteria for Assessing other Proposals

Proposals for a new permanent or transit Gypsy, Traveller and Travelling Showpeople site will only be considered suitable if the proposed site:

*a)is not subject to existing or predicted air, road and/or rail noise in excess of **Leq 16hr 51dB for daytime and Leq 8 hr 45dB for night-time for aircraft noise.** ~~57 decibels for permanent sites, 60 decibels for long term temporary sites up to one month, and 66decibals for temporary sites~~*

... [continue with other criteria ((b) to (f))]

Reasoned Justification – Proposed Amendment

Paragraph 13.46

16.9 The supporting text at paragraph 13.46 would need to be updated in line with GAL's comments on the appropriate noise thresholds to be applied for traveller sites as follows:

However, caravans offer a much lower level of acoustic attenuation than bricks and mortar accommodation and exposure, even for short periods, can affect health. Therefore, in the interests of the health of inhabitants, sites will not be permitted if noise exposure would, during the lifetime of any permission, be in excess of 51 dBA Leq.

Chapter 17 Sustainable Transport

Policy ST1: Development and Requirements for Sustainable Transport

GAL support Policy ST1 with amendment.

17.1 GAL broadly supports Policy ST1 but considers that the policy requires amendment with the insertion of the new policy wording and set out as the penultimate paragraph of the policy:

‘ST1 c)

The development is required to ensure that any needs and impacts on existing major infrastructure, including upon Gatwick Airport as nationally significant infrastructure, are taken in to account when preparing Transport Statements and Transport Assessments for development’.

Policy ST3: Improving Rail Stations

GAL objects to Policy ST3

18.1 Policy ST3 notes that “developments at or within the vicinity of railway stations will be expected to enhance the specific roles of the individual stations” and “...at Gatwick Station, support its function as an airport-related interchange...”.

However, the further statement in Policy ST3 (a) “...and provide opportunities for broadening the function of the station as an interchange for surface travellers using rail, coach, Fastway and other buses” is not supported by GAL unless qualified with the insertion of the following new additional policy wording to Policy ST3 (a):

Policy ST3 (a) - Proposed Amendment

*“at Gatwick Station, support its function as an airport-related interchange and provide opportunities for broadening the function of the station as an interchange for surface travellers using rail, coach, Fastway and other buses **without detriment to the safe and efficient operation of the airport**”*

18.2 Due to its geographic location relative to residential and employment areas within the borough, Gatwick Airport station is unlikely to be the nearest or most convenient local station for new development except where development is close to or contiguous with the airport boundary. As part of our responsibilities for the safe and secure operation of the airport GAL will not be in a position to support any developments that rely on access to Gatwick Airport station without assessment of the full impacts on the safe and secure operation of the adjoining airport terminal, access routes that require use of airport assets or land including permitted rights of way, or prior agreement with GAL to secure the improvement or enhancement of access routes within the GAL estate. This includes an assessment of the capacity of Gatwick Airport station as well

as its entries and exits taking account of the anticipated demand from proposed development.

18.3 The re-development project at Gatwick Airport station noted in paragraph 17.19 reflects the needs of current rail passengers and the future needs of airport-related travel by staff and passengers, noting GAL's commitment towards sustainable travel. The investment does not assume an increased role or for "*broadening the function of the station*" as stated. The improvements are being funded by Network Rail, DfT and GAL. GAL has provided further investment to improve accessibility from the bus stops on the A23 adjacent to South Terminal. There has been no additional investment or support from Crawley Borough Council or West Sussex County Council to improve access routes to Gatwick Airport station, or justification for its role as an interchange serving the local population. By contrast, investment has been made for improving access to Crawley station and Three Bridges station.

Policy ST4: Safeguarding of a Search Corridor for a Crawley Western Relief Road

19.1 GAL object to the Search Corridor as shown in the draft Plan for the Crawley Western Relief Road as it encroaches on the safeguarded land identified for potential future airport expansion. (*GAL has made comments on the Crawley Western Relief Road in its representation in objection to Policy SD3*).

Policy ST4 - Proposed Amendment

GAL proposes the wording of Policy ST4 should be amended as follows:

"The design and route of the Crawley Western Relief Road must take account of its impact on residential properties close to the route, the flood plain, the rural landscape, local biodiversity, heritage, ~~and~~ heritage landscape assets and visual intrusion and must not encroach on the land safeguarded for the future potential expansion of Gatwick Airport."

GAL Comment:

19.2 GAL considers that it must be made clear in Policy ST4 and the supporting text that the Crawley Western Relief Road (CWRR) must not compromise the land that is currently safeguarded by national policy for potential future airport expansion. The land currently safeguarded at Gatwick Airport must continue to be protected from inappropriate development which would include the Crawley Western Link Road. This strategic road development is required to deliver the development planned in the Local Plan. It should therefore be delivered on land where availability is certain during the Plan period. This is not true of the safeguarded land. GAL considers that the search corridor should therefore be re-drawn and focused in the area immediately south of the safeguarded land area.

19.3 In addition, GAL consider that there is a significant risk that the implementation of the Crawley Western Relief Road will increase traffic on the A23 north of County Oak and create considerable additional demand at North Terminal Roundabout and

South Terminal Roundabout. Both of these junctions are managed by Highways England and in the case of South Terminal Roundabout is part of the Strategic Road Network (M23 Jn 9a). The policy makes no statement regarding its impact on access for the airport (including whether a new highway would undermine efforts to support bus and rail access from west Crawley and Horsham) or access to the Strategic Road Network. Traffic using the new route to access areas in the centre and north of Crawley will affect the flow of traffic travelling north-south along the A23, potentially creating increased congestion.

19.4 Without evidence and mitigation of the impacts of such changes in traffic flow on the safe and efficient operation of Gatwick Airport as nationally significant infrastructure, and the impacts of drawing more traffic to M23 Jn9 it is not possible to support consideration of a possible alignment for the new highway. It should be noted that the imminent completion of the M23 Smart Motorway Project has the potential to impact the distribution of traffic and the full effects on the wider transport network, including the strategic routes to the east and west of Crawley as well as routes through the town centre should be established. Gatwick Airport will be undertaking its own traffic modelling with respect to its Northern runway proposals and will require assurances that the delivery of the Crawley Western Relief Road will not have negative impacts on the operation and accessibility of the airport.