

Crawley 2037

Draft Crawley Borough Local Plan 2021 – 2037

June 2021

Regulation 19 Consultation

Representation on behalf of the Wilky Group



GatwickGreen

WHERE THE FUTURE WORKS

Policy GAT2
Safeguarded Land
June 2021



Crawley

Local Plan

Ref No:

Office use only

Crawley Submission draft Local Plan Representation

Please return your completed representation form to Crawley Borough Council
by 5pm on 17 February 2021.

Representations can be made via this form and emailed to strategic.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 [here](#).

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	Mr
First name:	Sally	Simon
Surname:	Fish	Fife
Organisation:	Wilky Group	Savills
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Address line 2:	Lower Road	Priors Walk
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Telephone:	01483 230320	01202 856912
Email:	Sally.fish@Wilky.co.uk	sfife@savills.com

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: Other:

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

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

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

Please see attached response and appendices

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 attached response and appendices

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:

The Planning Inspectorate's procedure guide for Local Plan Examinations (Feb 2021) states at para 3.10 that a representor has a right to appear at Hearings where a change to the Plan has been sought.

Policy GAT2 safeguards land for an additional wide-spaced runway south of Gatwick Airport, including land east of the Airport required for airport-related surface car parking. TWG does not put forward any evidence on the principle of safeguarding, but instead provides evidence to support the Council's case in allocating Gatwick Green on land safeguarded in the adopted Local Plan. TWG is also seeking important changes to the policy to provide for the access to Gatwick Green to be provided within Safeguarded Land to ensure a resource and land-efficient approach to this infrastructure, and to amend the extent of the Safeguarded Land – and as a consequence the extent of the Gatwick Green allocation under Strategic Policy EC4 – to address information provided by Gatwick Airport Ltd and in relation to a number of mapping errors. It is therefore considered that the representation raises important and significant planning matters in support of the integrity of the Council's economic strategy and the provision of highway infrastructure related to the future runway proposals and Gatwick Green in a resource and land-efficient manner. These matters justify the attendance of TWG at the Hearings.

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/localplanreview

Signature



Date

29/06/2021

**Draft Crawley Borough Local Plan 2021 - 2037
January 2021**

Regulation 19 Consultation

Representation on behalf of the Wilky Group

Policy GAT2: Safeguarded Land

June 2021



1.0 Introduction

- 1.1 This representation is submitted on behalf of The Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. It relates to Policy GAT2 Safeguarded Land in the draft Crawley Borough Local Plan, 2021 (DCBLP).
- 1.2 TWG owns about 48 ha (119 acres) of land east of Gatwick Airport as shown the plan at **Appendix 1**. The land has been promoted by TWG as a strategic employment opportunity known as Gatwick Green (the Site). The Site is proposed for allocation as a Strategic Employment Location (SEL) of 47 ha (116 acres) in the DCBLP under Strategic Policy EC4 as a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8. The extent of the SEL allocation is identified on the plan at **Appendix 1**.

Background

- 1.3 These are TWG's representations made in the light of the updated DCBLP 2020, which was published following the advice from the Planning Inspectorate to Crawley Borough at the Advisory Visit in April 2020: the advice was that the Local Plan had to include a strategy to address Crawley's employment needs and that the removal of safeguarding could not be regarded as certain. Accordingly, the representations revise TWG's position, given the changes in the draft Plan and the revised / updated evidence base since the original representations were made.

Scope of representation

- 1.4 This representation does not address the principle of Safeguarded Land for a possible additional wide-spaced runway at Gatwick Airport. Instead, it focuses on its extent under Policy GAT2 as identified on the draft Local Plan Map and its interface with Gatwick Green.
- 1.5 Land use planning and aviation evidence is provided to demonstrate that Gatwick Green can be developed in a manner that is fully compatible with, and not prejudicial to, the future development of an additional wide-spaced runway at Gatwick Airport.
- 1.6 The representation also contains detailed evidence to support minor adjustments to the DCBLP to ensure that a land and resource-efficient approach is taken in the planning of

shared highway access infrastructure, whilst also correcting some mapping errors in relation to the extent of the Safeguarded Land as shown on the draft Local Plan Map.

Executive Summary

- 1.7 TWG supports Gatwick Green being removed from the extent of the Safeguarded Land, as identified under draft Policy GAT2, and provides evidence to demonstrate that Gatwick Green can be developed in a manner that is fully compatible with, and not prejudicial to, the future development of an additional wide-spaced runway at Gatwick Airport. The representation includes airport planning evidence by Mott MacDonald to support the case being made.
- 1.8 The Aviation Policy Framework (APF¹) and the National Planning Policy Framework (NPPF, 2019) provide national aviation and planning policy to guide the future expansion of airport infrastructure. The APF states that airport master plans should be subject to wide consultation with local authorities, the community and stakeholders, allowing the future development airports to be considered in the local plan process. Airport Master Plans should contain sufficient information and drawings to identify any additional land requirements, which under the NPPF must be based on 'robust' evidence to identify any infrastructure that is 'critical' to the scheme so as to minimise long-term uncertainty and blight.
- 1.9 Gatwick Airport Ltd (GAL) prepared the Gatwick Area Master Plan in 2019² (GAMP). The GAMP is a key document where the evidence and justification for safeguarding is expected to be found. The Council should therefore expect to see the robust evidence that supports the extent of the Safeguarded Land in the GAMP. However, whilst the GAMP includes a conceptual layout for an additional runway, this is not underpinned by any evidence to support the extent of land safeguarded for surface parking east of Balcombe Road (c 92 ha or 227 acres).
- 1.10 The evidence therefore supports the Council's decision to remove some of the historically Safeguarded Land indicated as surface airport-related car parking related to a future additional wide-spaced runway to allow the allocation of Gatwick Green. The Council's decision is based on the conclusion that surface parking does not represent an efficient use of this land, and given anticipated proposals by GAL for more land-efficient car parking and sustainable surface access.

¹ The Aviation Policy Framework, DfT, March 2013

² Gatwick Airport Master Plan 2019, Gatwick Airport Ltd, July 2019

- 1.11 Indeed, GAL is already planning more land-efficient parking solutions through its Development Consent Order (DCO) for the continuous use of the emergency runway. The continued sterilisation of Gatwick Green for future car parking would represent an unnecessary, inefficient and inappropriate use of a key strategic site needed to meet the clear and urgent economic needs of the Borough.
- 1.12 The evidence also demonstrates that the highway requirements related to Gatwick Green and the additional wide-spaced runway can be accommodated in the Safeguarded Land between the Gatwick Green allocation and the M23 spur road – this represents a resource-efficient solution with significant benefits for TWG and GAL. These matters have been the subject of discussions between TWG’s transport consultant and Gatwick Airport Limited (GAL). Some minor adjustments to the DCBLP are proposed to allow for the joint use of this strip of Safeguarded Land.
- 1.13 The evidence shows that in all other respects, Gatwick Green can be developed to be mutually compatible with the future development of an additional wide-spaced runway. The evidence also supports three minor adjustments to the extent of Safeguarded Land on the Local Plan Map, which are proposed to address some mapping errors that have arisen in the definition of the Safeguarded Land and the Gatwick Green allocation.

2.0 Extent of Safeguarded Land

Introduction

- 2.1 TWG provides evidence to demonstrate that the removal of Safeguarded Land from Gatwick Green under draft Policy GAT2 and identified on the Local Plan Map is justified. Evidence is also provided to demonstrate that Gatwick Green can be developed in a manner that is fully compatible with, and not prejudicial to, the future development of an additional wide-spaced runway at Gatwick Airport. TWG also proposes some minor adjustments to the Safeguarded Land to reflect GAL’s requirements and TWG’s landownership, and to policy wording to ensure that Gatwick Green can be fully developed in a land and resource-efficient manner which offers mutual compatibility with an additional runway in terms of highway / access infrastructure. The representation includes airport planning evidence by Mott MacDonald to support the case being made.

Safeguarding under national policy

- 2.2 The Aviation Policy Framework (APF, 2013) provides current Government policy on aviation. The APF recommends that airports continue to prepare Master Plans to address the future development and expansion of airports (paras 4.11-4.12). In preparing local

plans, local authorities are required to have regard to policies and advice in the APF, along with other relevant planning policy and guidance (para 5.6). Airport Master Plans should, *inter alia*, include any long-term land requirements associated with future airport development (para B.5) and that this should be clearly identified on a safeguarding map (para 5.8) to minimise long-term uncertainty and non-statutory blight (para B.5). However, the responsibility for safeguarding land for future expansion rests with local planning authorities based on guidance in the National Planning Policy Framework (NPPF). Similar guidance is contained in the UK Government's Aviation Green Paper, known as the draft Aviation Strategy (AS, 2018 – para 3.66), though this is not formal Government policy.

- 2.3 The National Planning Policy Framework (NPPF, 2019) provides for the protection of sites and routes for future transport. The policy is contained at para 104(c)), which states that planning policies should:

"(c) 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;" (Savills emphasis)

- 2.4 The Aviation Policy Framework (APF³) reiterates the above policy from the NPPF at paragraphs 5.8-5.9, and goes on to state that Airport Master Plans should provide a clear statement of intent to enable future development of an airport to be given due consideration in local planning processes. It also requires that there should be wide consultation with local communities, including with local authorities. Furthermore, Airport Master Plans should contain sufficient information and drawings so that they may be clearly understood by the lay person as well as professionals and that any additional land should be clearly identified to minimise long-term uncertainty and non-statutory blight.
- 2.5 Gatwick Airport Ltd (GAL) prepared a Master Plan in 2019⁴ (GAMP).. The Council should expect to see the robust evidence that supports the extent of the Safeguarded Land shown in the GAMP.
- 2.6 National policy contains two tests for the inclusion of safeguarding in local plans (para 104 (c)), namely that the extent of the safeguarding must be based on robust evidence of its need and that it must relate to infrastructure that is critical to the development of the infrastructure so as to widen transport choice and realise opportunities for large scale development. The above tests are particularly important for the future of Crawley given the historic conflict between providing for unmet employment needs and safeguarding

³ The Aviation Policy Framework, DfT, March 2013

⁴ Gatwick Airport Master Plan 2019, Gatwick Airport Ltd, July 2019

land for airport infrastructure. The NPPF is clear that any inclusion of safeguarding policies in a Local Plan is, in the first instance, a matter for the local plan-making authority to consider and justify. In the context of the policy and guidance contained in the NPPF and the APF, the need for any land to be safeguarded must be tested through the plan-making process.

- 2.7 Any safeguarding must therefore be justified by robust evidence of need and the area should be no bigger than that which is critical to serve the purpose of the scheme, i.e. related to required operational airport infrastructure. TWG has long made the case that there is no justification for safeguarding all the land to the east of Balcombe Road as shown on Plan 21 of the GAMP (**Appendix 2**) for surface car parking as indicated on Plan 20 of the GAMP (**Appendix 3**). Safeguarding of the Site owned by TWG and comprising the Gatwick Green allocation is not considered to be justified by any 'robust' evidence in the GAMP. The GAMP does not establish that the Gatwick Green land is 'critical' to serving the purpose of delivering an additional wide-spaced runway. The Council should expect to find the 'robust' evidence for the extent of safeguarding in the GAMP, but in relation to the significant provision for surface airport-related car parking, no such evidence is presented. The Council were therefore right to conclude that the case for safeguarding all the land east of Balcombe Road had not been made. No other evidence to explain and justify the extent of current safeguarding has been seen.
- 2.8 Land east of Balcombe Road has been blighted by safeguarding since about 2004, which has had the effect of preventing the Council from allocating a strategic employment site and meeting its identified needs within the Crawley area. Gatwick Green has been consistently promoted for employment use by TWG throughout this period with its potential acknowledged through the Area of Search (AoS) in the adopted CBLP 2015 (Policy EC1) and the Area Action Plan (AAP) in the DCBLP 2020 (proposed Policy SD3).

The extent of safeguarding for airport car parking – planning policy considerations

- 2.9 Having properly considered and applied the safeguarding policy tests set out above, the Council has responded positively to the long-standing need for strategic employment land by allocating Gatwick Green for strategic employment development under Strategic Policies EC1 and EC4. The DCBLP therefore included an area of Safeguarded Land for a future additional wide-spaced runway at Gatwick Airport, but with 47 ha of previously Safeguarded Land excluded to accommodate an industrial-led Strategic Employment Location known as Gatwick Green.

- 2.10 The Council set out its approach to planning for Gatwick Airport in Topic Paper 2⁵ - in addition to addressing the future needs of the airport, it set out the strategy to bring forward new employment land/floorspace through the allocation of Gatwick Green, cross-referencing its economic evidence contained in Topic Paper 5⁶. Taking account of the Inspector's advice at the Advisory Visit in April 2020, the Council considered the extent of safeguarding rather than the principle of it. In doing so, it took account of the long-standing constraint safeguarding had imposed on the Borough's land supply; the findings on the need for more employment land contained in the Economic Growth Assessment (EGA), and the need to accommodate a Strategic Employment Location (SEL) at Gatwick Green (Topic Paper 2, paras 2.3.4, 3.3.1, and 3.4.1). The DCBLP therefore retained safeguarding based on an amended land take, enabling a SEL to be allocated whilst safeguarding from development the land that would be required to accommodate a possible southern runway and associated infrastructure (para 3.3.5).
- 2.11 Savills' assessment of the Industrial and Logistics (I&L) market⁷ supports the Council's assessment of employment land need contained in the Council's North West Sussex Economic Growth Assessment Focused Update for Crawley (EGA CU), and the Council's approach of expressing this need as a **minimum** in policy.
- 2.12 Topic Paper 2 went on to conclude that the land to be allocated for Gatwick Green was not needed for the runway or related highway connections, but only for a large area of surface car parking. In light of the evidence, the proposed extent of surface car parking east of Balcombe Road (c 92 ha or 227 acres) did not represent an efficient use of land given that there are more land-efficient approaches through decked and robotic parking, which the airport is adopting and are in line with the airport's Surface Access Strategy.
- 2.13 The evidence therefore supports the Council's decision to remove some of the historically Safeguarded Land indicated as surface airport-related car parking related to a future additional wide-spaced runway to allow the allocation of Gatwick Green. The Council's decision is based on the conclusion that surface parking does not represent an efficient use of this land given proposals by GAL for more land-efficient car parking and sustainable surface access.
- 2.14 GAL is already planning more land-efficient parking solutions. It is promulgating a Development Consent Order (DCO) for the continuous use of the emergency runway, which includes decked parking arrangements to free up land for other critical land uses

⁵ Topic Paper 2: Gatwick Airport, Crawley Borough Council, January 2021

⁶ Topic Paper 5: Employment Needs and Land Supply, Crawley Borough Council, January 2021

⁷ Appendix 3 to representation on Strategic Policy EC1 – Savills on behalf of TWG

to enable capacity to be increased from c 50 mppa (million passengers per annum) to c 74 mppa, an increase in capacity of 50%.

2.15 In addition to the long-standing unmet need for employment land, the Council has more recently acknowledged the need for employment land to address the economic impacts of the COVID-19 pandemic. Whilst not referenced in the DCBLP, the Crawley Economic Recovery Plan⁸ notes one of five 'Flagship Interventions' to secure a diverse and resilient economy as unlocking "*sufficient suitable employment land to drive recovery*". This intervention is embodied in Strategic Policy EC4 of the DCBLP, which allocates Gatwick Green. The allocation has been made in light of long-term economic circumstances, but has since gained a further purpose to assist in addressing the impacts of the COVID-19 pandemic, recognising that retaining the Site for possible long term airport-related surface car parking would represent "*an inefficient use of the land*" in the context of:

- a. The Airport's plans for decked and robotic parking to serve its short-term expansion plans under its planned Development Consent Order (DCO)⁹.
- b. The increasing switch to more sustainable modes of transport under its Surface Access Strategy (para 3.4.1, Topic Paper 2: Gatwick Airport, January 2021).

2.16 As previously stated, there is neither a critical need for, nor any robust evidence to support, the continued safeguarding of Gatwick Green for additional airport-related car parking.

2.17 On behalf of TWG, Mott MacDonald's aviation team has undertaken a preliminary assessment of the need for airport-related surface long-stay car parking to serve the future additional wide-spaced runway at Gatwick Airport. The assessment considers whether there is a likely to be a need for 47 ha of airport-related surface car parking which would be lost to Gatwick Green, together with alternative approaches to accommodating future parking requirements – the assessment is contained in **Appendix 4**. The purpose of this work is to test the Council's assessment that the land in question would represent "*an inefficient use of the land*" when set against the context of the Airport's stated plans for decked parking, robotic parking, and higher yielding and more land-efficient valet parking products, along with the success already achieved in increasing use of more sustainable modes of transport.

⁸ Crawley's "One Town" Economic Recovery Plan, First Draft, Crawley Borough Council, February 2021

⁹ Your London Airport, Gatwick, our northern runway: making best use of Gatwick | Environmental Impact Assessment Scoping Report Volume 1: Main Text, GAL, September 2019 (paras 4.36 and 5.2.42)

- 2.18 The conclusion of the assessment is that there is very unlikely to be a need for the scale of surface car parking that would be displaced by Gatwick Green, and that any unmet need could be comfortably accommodated through alternative parking solutions within the existing operational area and the remaining Safeguarded Land identified under Policy GAT2. GAL is planning and trialling alternative intensive parking solutions and so the full extent of land safeguarded for additional surface car parking is most unlikely to be required in the future. The continued sterilisation of Gatwick Green for future car parking would represent an unnecessary, inefficient and inappropriate use of a key strategic site needed to meet the clear and urgent economic needs of the Borough.
- 2.19 The policy in the NPPF requires **robust** evidence to justify safeguarding any land, and no such evidence has been provided in the GAMP with respect to the parking areas shown over Gatwick Green. TWG considers that the Council is correct in its decision that safeguarding Gatwick Green for surface car parking represents an inefficient use of land. In terms of the policy tests in the NPPF, namely the sustainability assessment of alternatives and the tests of soundness, the use of the Site as a Strategic Employment Location (SEL) as opposed to surface car parking is wholly justified. Surface car parking is, therefore, inefficient and the alternative use as a strategic employment site is justified not only through identified existing employment land needs, but also as a result of the ongoing economic difficulties associated with the COVID-19 pandemic.
- 2.20 The Council has assessed the alternative options in its Sustainability Appraisal¹⁰ (SA/SEA). This evaluated three options: (1) safeguarding land as shown in the GAMP, (2) do not safeguard any land, and (3) safeguard land with an amended boundary to allow for strategic employment provision. Option 3 was selected as the most sustainable option as it responded to national policy to retain safeguarding, but with an amended boundary to accommodate Crawley's unmet employment land needs in the form of a SEL at Gatwick Green. This approach enabled land south of the airport required to accommodate the physical land take of a possible wide-spaced runway and its operations to be retained. The approach is summarised in the DCBLP as the justification for allocating Gatwick Green under Strategic Policy EC4 (para 9.53):

“The council does not consider parking to represent an efficient use of the site, particularly given the significant employment needs of Crawley borough, and is of the view that the airport could accommodate parking more efficiently through decked and robotic parking and other efficiency measures, should it be demonstrated that additional on-airport parking is required having regard to the airport's surface access obligations stated in the S106 legal agreement.”

- 2.21 The analysis outlined above is reflected in Topic Paper 2 on Gatwick Airport.

¹⁰ Crawley Borough Council Local Plan Review | Sustainability Appraisal / Strategic Environmental Assessment, Draft Report, For the Submission Local Plan, January 2021

The extent of safeguarding for airport car parking – airport masterplanning considerations

2.22 More detailed evidence in this representation demonstrates that the Council's analysis is correct such that there is an overwhelming and sound case in support of Policy GAT2. That evidence is contained in the assessment by Mott MacDonald (**Appendix 4**), which can be summarised as follows:

- The Aviation Policy Framework recommends that airports continue to prepare Master Plans as a clear statement of intent so that this can be given due consideration in local planning processes.
- The National Planning Policy Framework (NPPF) states that there must be 'robust evidence' to identify and protect sites and routes 'critical' to developing transport infrastructure.
- An Airport Master Plan should provide the robust evidence to justify the requirements for safeguarded land for infrastructure that is critical to the expansion of the airport. No other evidence to explain and justify the extent of current safeguarding has been seen.
- The GAMP does not include analysis or justification for the extensive area indicated for surface long-stay car parking between Balcombe Road and the M23, instead referring to preceding Master Plans, that also do not include these details.
- Two trends have dominated car parking requirements at Gatwick Airport: (1) the significant improvement in public transport mode shift, from private cars to rail, and (2) additional car parking required to support growth in air traffic has been accommodated within existing airport owned land through intensification of parking density. Driven by GAL's own innovative parking initiatives and sustainable transport targets, these trends will continue so as to support anticipated growth over the next 15 years.
- There is no robust evidence available to justify the extent of surface parking that was initially indicated over 15 years ago. Any analysis should have been published as a part of the Airport Master Plan and should have been updated over time to take into account these well established and continuing trends of mode share shift to sustainable public transport and parking density / automation.

2.23 Consistent with these findings and foreshadowing Policy GAT2 and the allocation of Gatwick Green, paragraph 3.20 of the DCBLP 2020 stated that *"the indicative plans for a southern runway provided in the Gatwick Airport Masterplan show a large area for surface car parking, indicating an inefficient use of valuable land in a constrained borough with high development needs. A more consolidated approach could potentially open up opportunities for other developments"*. In removing Gatwick Green from safeguarding, the Council recognised not only the historic and current evidenced need for employment land release, but also the urgent need to provide economic development opportunities in the face of an unprecedented economic downturn in the local economy arising from the

COVID-19 pandemic. The impacts of the pandemic are borne out by two Centre for Cities assessments in April 2020¹¹ and January 2021¹², which set out a very bleak view of the economic impacts on Crawley:

“Crawley for instance – the most vulnerable city or large town according to our classification – has the highest share of employees in the aviation and aircraft manufacturing industry of any city. Around 18 per cent of its workforce is employed in the aviation industry and related sectors compared to an average of around 1 per cent across British cities. The result is that over half of all of Crawley’s jobs are at risk of being either furloughed or lost completely.”

“The economic impact of the pandemic has hit places that were doing okay before Covid — places where levelling up wasn’t an issue. London, Slough and Crawley are among the hardest hit. Some, like London, should bounce back quickly once it is safe to lift restrictions. But for others, where the economic damage has hit key industries like aviation there could be ‘levelling down’”.

2.24 In light of the above economic considerations, TWG notes the Council’s approach to the principle of safeguarding and supports the general extent of Safeguarded Land under draft Policy GAT2 and as shown on the draft Local Plan Map, but subject to (1) minor adjustments to take account of three mapping errors relating to TWG’s land ownership, and (2) an adjustment in respect of the extent of safeguarding south of the M23 spur road as explained in the remainder of this representation. These matters are addressed in more detail below.

3.0 Compatibility between highway infrastructure associated with Gatwick Green and the additional wide-spaced runway

3.1 Between the Gatwick Green allocation and the M23 spur road is a strip of Safeguarded Land retained to accommodate highway infrastructure required for the possible additional wide-spaced runway at the Airport and owned by TWG. This highway infrastructure comprises the following:

1. Two slip roads (that merge into one) intended to connect the diverted A23 to Junction 9 on the M23, following an alignment close to the existing M23 spur road.
2. The diversion of Balcombe Road to the east to follow the M23 and to re-join the diverted A23 to the south.

3.2 In addition to the above, TWG intends to create highway infrastructure for the Gatwick Green site, parallel and close to the M23 spur road – this intention was noted in the

¹¹ <https://www.centreforcities.org/blog/what-does-the-covid-19-crisis-mean-for-the-economies-of-british-cities-and-large-towns/>

¹² [Cities Outlook 2021, Centre for Cities, January 2021](#)

- Development Framework Plan submitted as part of TWG's representation on Policy EC1 of the DCBLP 2020. The adjoining Gatwick Green allocation requires access from Balcombe Road forming an east-west access road within this Safeguarded Land to serve storage and distribution development: this would result in the potential for three roads to be constructed in broadly the same corridor and running parallel to the M23 spur road. This could be reduced to two roads with a more efficient approach. TWG has given consideration as to how the highway infrastructure for Gatwick Green could be accommodated within the Safeguarded Land in a more efficient manner and without prejudicing the future provision of the slip roads to serve the proposed additional runway.
- 3.3 As part of this consideration, it has become apparent that the Safeguarded Land as shown on the draft Local Plan Map requires amendment to address a mapping error so as to fully accommodate the GAL future highway infrastructure. **Appendix 5** contains a plan that shows the full extent of the land that needs to be safeguarded based on information provided to TWG by GAL. The plan also shows how the highway infrastructure for Gatwick Green can be accommodated in the revised Safeguarded Land. To avoid a land and resource-inefficient outcome, the Gatwick Green access road has been designed to coincide with a logical alignment of a diverted Balcombe Road within the Safeguarded Land, which could, in the future, form part of the diverted Balcombe Road and be upgraded as required by GAL. The access road has been designed with limited intersections so as to ensure it can perform satisfactorily as the diverted Balcombe Road. The slip roads could be accommodated within the amended Safeguarded Land.
- 3.4 The accommodation of these highway requirements have been discussed with GAL with a view to reaching an agreement that these arrangements meet the needs of both parties. Periodic engagement with GAL has identified matters which may usefully be resolved prior to the Examination in Public of the DCBLP. These matters remain under discussion pending further clarification of the position which GAL wishes to adopt on each matter.
- 3.5 In the absence of an agreement with GAL, TWG is clear that the proposed arrangements are technically feasible and viable from a transport planning and highways perspective. TWG considers that this arrangements represent pragmatic, workable and resource and land-efficient solutions which should be embodied into policy in the DCBLP. It allows TWG to utilise the land it owns in the most efficient manner whilst not prejudicing the Airport's long term access plans. Further, it avoids the duplication of roads, thereby reducing the carbon footprint of the proposals, provides room for additional landscaping (as a buffer to the M23 spur) and would assist in reducing the cost of the future Airport highway infrastructure to the benefit of GAL.
- 3.6 These arrangements can be accommodated via minor changes to the DCBLP:

1. The strip of Safeguarded Land should be adjusted to reflect that on the plan at **Appendix 5**.
 2. A policy response to facilitate the dual use of the Safeguarded Land in this area – details are set out later in this representation.
- 3.7 Whilst the former is a matter for the Council to address via Minor or Main Modifications to the draft Local Plan Map, the latter is being promoted by TWG and will require adjustments to two policies in the DCBLP to ensure that the Gatwick Green highway infrastructure can be accommodated in the Safeguarded Land. Based on investigations by TWG’s transport consultants, this infrastructure can be accommodated in the Safeguarded Land without prejudicing the provision of the longer-term highway proposals associated with the additional runway at Gatwick.
- 3.8 Such a policy approach has been adopted in other Local Plans to address situations where future possible infrastructure requirements need to be accommodated alongside planned urban development proposals in a compatible manner. The benefit of this approach is that it avoids the need to overlay the two designations, which would be unnecessary and overcomplicate the Local Plan Map, making it difficult to interpret. Details of the proposed changes are noted in the conclusions to this representation. TWG considers that these changes to policies GAT2 and EC4 would be acceptable in soundness terms.

4.0 Compatibility of Gatwick Green and a future additional wide-spaced runway

- 4.1 The technical assessment by Mott MacDonald (**Appendix 4**) also addresses the wider compatibility between Gatwick Green and the proposed additional wide-spaced runway and related infrastructure. The assessments conclude that the Gatwick Green allocation is considered to be compatible with the future development of the airport for the following reasons:
- It would not block or prevent any critical infrastructure (such as runways, railways or terminal buildings) that are required to safeguard for an additional wide-spaced runway to the south of the existing airport.
 - It would not hinder sustainable aviation growth at Gatwick Airport and is therefore fully compatible with any policy requirement to safeguard land for future national requirements.

- The site can be developed so as to be fully compliant with the land use requirements for PSZs¹³, as described in the DfT's Circular 'Control of Development in Airport Public Safety Zones' published in March 2010, in terms of the types of buildings and infrastructure proposed and the intensity of people within the individual third party risk contours.
- Gatwick Green can be designed so as to be fully compliant with all other aspects of Aerodrome Safeguarding that need to be considered to protect flight safety from the airport, i.e. in relation to heights of all buildings, bird strike hazard, cranes, lasers, glare and confusing patterns of lights. These will be taken into account and continue to be addressed as the scheme is developed through its design lifecycle.
- Gatwick Green would be compatible with the Airport's short-term expansion plans for the use of the standby runway under GAL's proposed DCO application.

4.2 The evidence contained in **Appendix 4** therefore demonstrates that Gatwick Green can be developed in a way that is entirely compatible with an additional wide-spaced runway, to allow:

- Future access to the retained surface airport-related car parking areas adjoining Gatwick Green.
- Future access to Gatwick Green and airport related car parking from the A23 diversion under the additional runway scheme.
- Highway infrastructure for Gatwick Green which is not prejudicial to the future provision of the additional runway highways.
- An access road for Gatwick Green within the Safeguarded Land between the Gatwick Green allocation and the M23 spur road that can form part of the division of Balcombe Road required for the additional runway scheme, upgraded as required.
- Land uses within the Gatwick Green site located within the Airport's existing Public Safety Zone (PSZ) that are compatible with the uses / activities permissible in the PSZ under current aviation regulations/guidance.
- The development of Gatwick Green without it conflicting with the aerodrome safeguarding requirements¹⁴.
- The development of Gatwick Green without it conflicting with any of the requirements under the Development Consent Order (DCO) proposals for the use of the standby runway.

Discussions between TWG and GAL

4.3 **Appendix 6** contains a statement setting out the scope of matters discussed between TWG and GAL relating to access to Gatwick Green and safeguarding for the delivery of

¹³ Public Safety Zones relating to operational airport runways

¹⁴ ODPM/DfT Circular 01/2003 'Safeguarding of aerodrome & military explosives storage areas' Direction 2002

a wide-spaced second runway to the south of Gatwick. The discussions focused on points of technical detail on five key areas relating to the interface between the surface access infrastructure required to serve Gatwick Green and the proposed additional wide-spaced runway south of Gatwick. No agreement has been reached between the parties, but some progress has been made and parties intend to continue discussions with intent to arriving at a Statement of Common Group (SoCG) prior to the DCBLP Examination.

5.0 Minor adjustments to the Safeguarded Land and the allocation for Gatwick Green – amendments to the Local Plan Map

- 5.1 The site plan submitted as part of TWG's representations on the DCBLP 2020 (March 2020) contained three mapping errors with regard to the land owned by TWG. Two small parcels of land north west of Rivington Farm and adjacent to Royal Oak House owned by TWG were erroneously omitted from the land shown on the plan as being owned by TWG. In addition, the Council has in error omitted a parcel of land owned by TWG from the allocation – this relates to a parcel of land fronting Peeks Brook Lane north of Royal Oak House. It was Crawley Borough Council's intention to allocate all of the land owned by TWG under Strategic Policy EC4 (except the Safeguarded Land south of the M23 spur road), but owing to the mapping errors, parts of the land near Rivington Farm and Royal Oak House were omitted from the allocation and inadvertently included as Safeguarded Land. The parcels of land are shown on the plans at **Appendix 7**.
- 5.2 This error only affects 5,589 sqm (0.56 ha) of land – the inclusion of these areas would result in a very minor loss of Safeguarded Land. Based on the evidence provided by Mott Macdonald on the need for Safeguarded Land for airport-related surface car parking (**Appendix 4**), it is considered that loss of these small areas of future surface car parking would not prejudice the future development of an additional wide-spaced runway and associated surface access requirements. It is therefore proposed that in order to effect an efficient use of land resources and the proper and effecting planning of the area, the draft Local Plan Map should be adjusted to correct these mapping errors.
- 5.3 There is also a discrepancy between the land safeguarded between the Gatwick Green allocation and the M23 spur road as detailed in para 3.3 above. This has resulted in a mapping error in respect of the amount of land required to be safeguarded south of the M23 spur road to accommodate all of GAL's future additional runway related access infrastructure. The result is that the Safeguarded Land in this area is not sufficient to accommodate all the surface access infrastructure associated with the possible additional wide-spaced runway, comprising new slip roads from the M23. The revised extent of this Safeguarded Land is shown on the plan at **Appendix 5**. It is therefore

proposed that the draft Local Plan Map should be adjusted accordingly to correct this additional mapping error.

6.0 Conclusions

- 6.1 It is concluded that against the tests of soundness at para 35 of the NPPF, **Policy GAT2 is sound** as it effectively reconciles the immediate need for critical economic development in Crawley Borough and the long term possibility of an additional wide-spaced runway at Gatwick Airport. This is a sound and positive approach to policy, which is justified by the Council's evidence contained in Topic Paper 2 (Gatwick Airport), Topic Paper 5 (Employment Needs and Land Supply) and the SA/SEA, and so is effective and consistent with national planning and aviation policy.
- 6.2 Whilst Policy GAT2 is sound, there are some minor changes to policy to ensure that the efficient and effective use of land resources is achieved. These minor changes are referred to in this representation.
- 6.3 It is therefore considered that the following two amendments should be made to the DCBLP to ensure that Gatwick Green's highway infrastructure can be accommodated in the Safeguarded Land between Gatwick Green and the M23 spur road in a way that is fully compatible with the future highway infrastructure required to serve the possible additional wide-spaced runway:
1. **Strategic Policy EC4 (Gatwick Green) should include a clause that allows for the required highway infrastructure to encroach into the Safeguarded Land between the Site and the M23 spur road**, on the proviso that it is designed and implemented so as to provide part of the future diversion of Balcombe Road and that the highways would not prejudice the future provision of motorway slip roads associated with the possible future additional wide-spaced runway. A proposed change to Strategic Policy EC4 is addressed in Savills representation on behalf of TWG on Policy EC4.
 2. **Policy GAT2 (Safeguarded Land) should include a provision that states that any highway infrastructure associated with the Gatwick Green allocation under Strategic Policy EC4 can be accommodated in the Safeguarded Land between the Site and the M23 spur road**, on the proviso that such infrastructure must not prejudice the future provision of motorway slip roads associated with the possible future additional wide-spaced runway.
- 6.4 In addition, the following amendments should be made to the Safeguarded Land on the Local Plan Map.
3. **Amend the Safeguarded Land on the draft Local Plan Map between Gatwick Green and the M23 spur road so as to accommodate the proposed spur roads from Junction 9 on the M23** to serve a future possible additional wide-spaced runway – the extent of the Safeguarded Land is as show on the Plan at **Appendix 5**. As a consequence, some small parcels

of land would be removed from / added to the land allocated as a Strategic Employment Location (Gatwick Green) on the draft Local Plan Map under Strategic Policy EC4.

4. **Amend the Safeguarded Land on the draft Local Plan Map** to exclude the small parcels of land owned by TWG on the plan at **Appendix 7**. As a consequence, these parcels of land would be included in the area allocated as a Strategic Employment Location (Gatwick Green) on the draft Local Plan Map under Strategic Policy EC4.

- 6.5 In relation to the proposed changes to the DCBLP at 1 and 2 above, revisions to Policy GAT2 have been made and are attached at **Appendix 8**.

Appendix 1

Site Plan





GatwickGreen

WHERE THE FUTURE WORKS

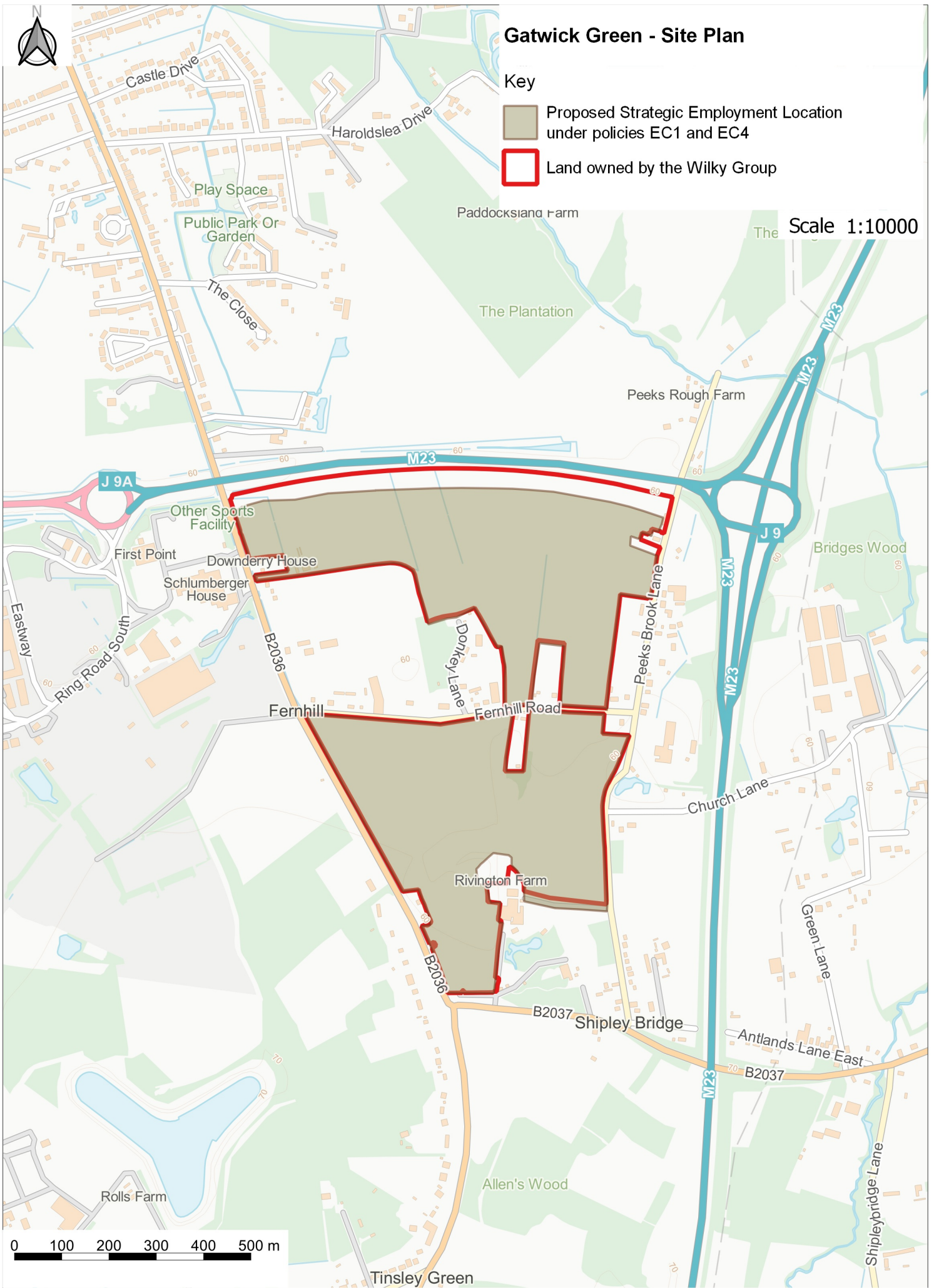


Gatwick Green - Site Plan

Key

-  Proposed Strategic Employment Location under policies EC1 and EC4
-  Land owned by the Wilky Group

Scale 1:10000



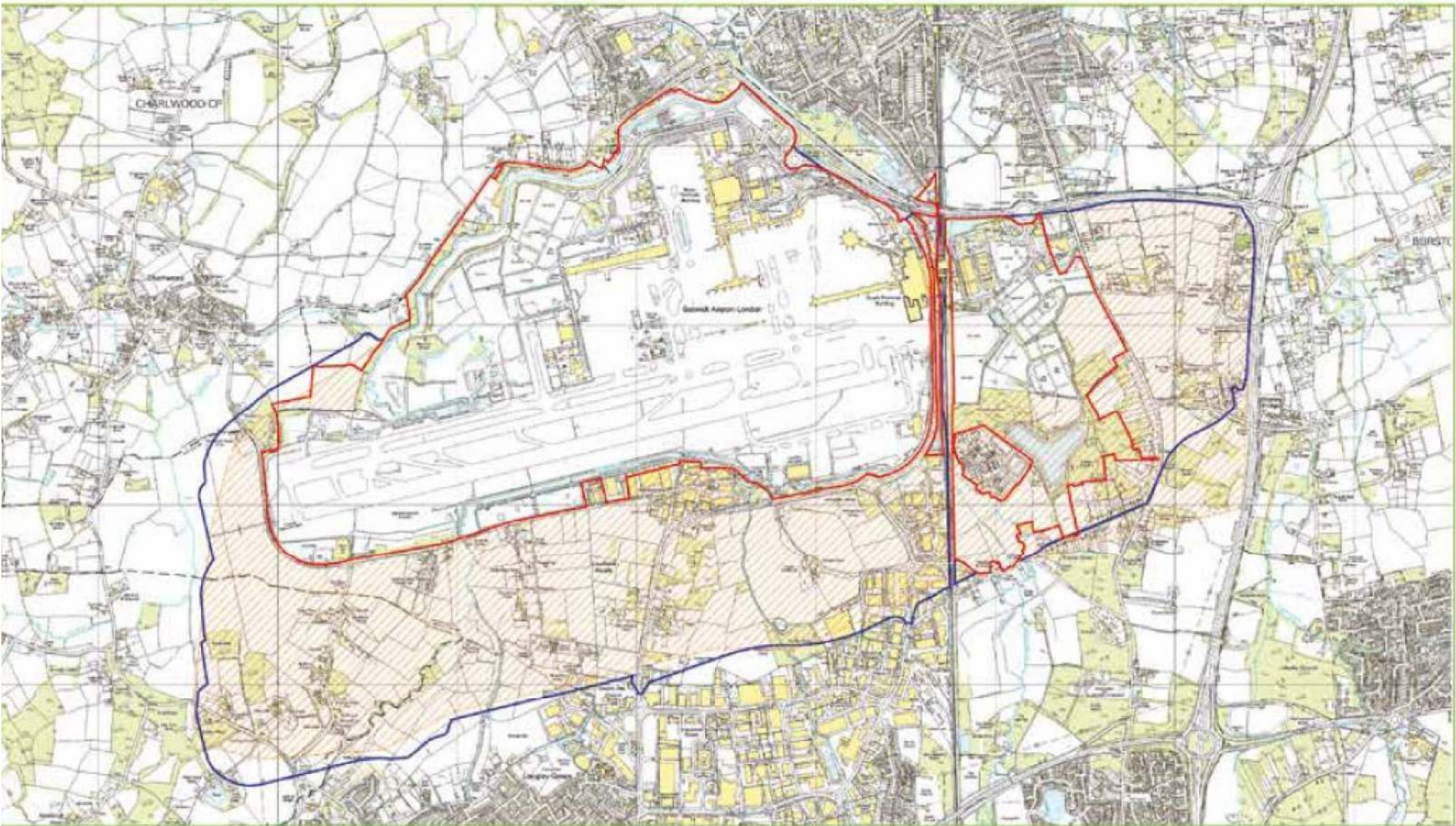
Appendix 2

Plan 21 from Gatwick Airport Master Plan, 2019



GatwickGreen

WHERE THE FUTURE WORKS



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PLAN 21 - Safeguarded land Additional Runway

 Existing Airport Boundary	 Proposed Additional Runway Airport Boundary	 Land Currently Safeguarded For The Additional Runway	 N
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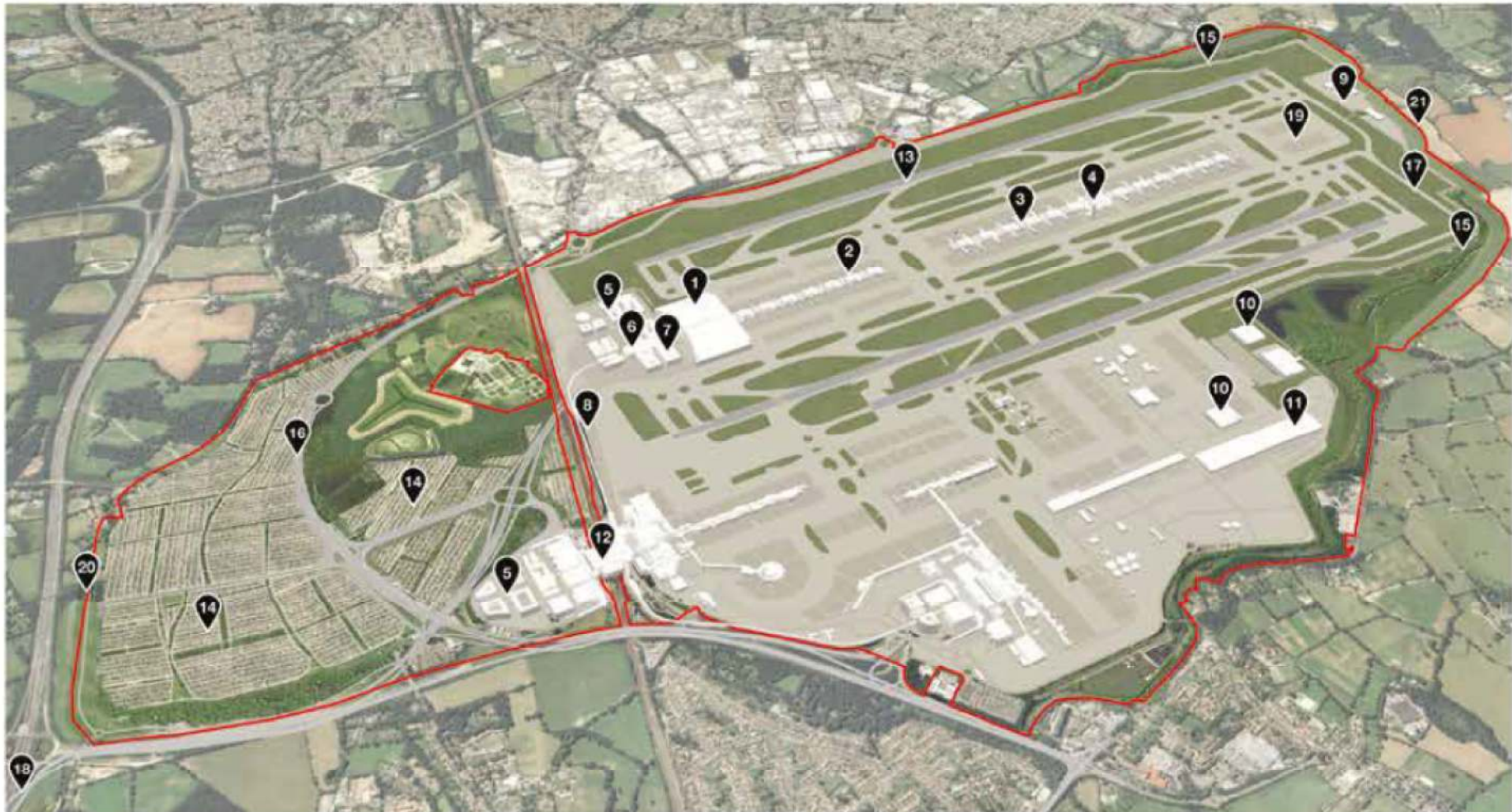
Appendix 3

Plan 20 from Gatwick Airport Master Plan, 2019



GatwickGreen

WHERE THE FUTURE WORKS



- | | | |
|-------------------------|--------------------------|----------------------------|
| 1 New Terminal Building | 10 New Hangar | 19 New Remote Stands |
| 2 Contact Pier | 11 New Cargo | 20 Gatcombe Road diversion |
| 3 Remote Pier | 12 Gatwick Gateway | 21 River Mole diversion |
| 4 New Control Tower | 13 New South Runway | |
| 5 Offices | 14 Long Stry Clock Poles | |
| 6 Carpark | 15 New Noise Barrier | |
| 7 Hotels | 16 AOD Diversion | |
| 8 People Mover System | 17 End Around Taxiway | |
| 9 Support Accomodations | 18 New M23 Sliproad | |
- Airport Boundary


PLAN 20 - Airport Layout Additional Runway

Appendix 4

Gatwick Green: Safeguarding - Mott MacDonald



GatwickGreen

WHERE THE FUTURE WORKS

1 Introduction

1. Crawley Borough Council released the Draft Crawley Borough Local Plan (DCBLP / Plan) for consultation on 6 January 2021, for responses by 30th June 2021. This statement forms an appendix to representations by Savills on behalf of the Wilky Group (TWG) to Policy GAT2 (Safeguarded Land), which relates to (1) land designated in the Plan as safeguarded for the potential future development of an additional wide-spaced southern runway for Gatwick Airport, and (2) the deletion of land previously safeguarded to accommodate the allocation of Gatwick Green as a comprehensive industrial-led development of predominantly storage and distribution uses.
2. In this statement, Section 2 provides an Executive Summary. Section 3 addresses the importance of Airport Master Plans and what they should contain given they are required for land-use planning purposes. Section 4 assesses the need for, and alternatives to, the land safeguarded for airport car parking related to a potential future wide-spaced southern runway. Section 5 will focus on compliance of Gatwick Green with aerodrome safeguarding requirements for operational flight safety. Section 6 addresses compatibility with the Airports DCO expansion proposals. Section 7 provides overall conclusions.
3. This appendix has been prepared by Mott MacDonald's airport planning team, supported by transport planners who specialise in airport surface access within an Integrated Transport Division. Both the airport and transport planning teams are very experienced in providing airport masterplans and surface access strategies to airports of all sizes. They operate in a global market and have a track record of working for some of the busiest and most complex international hub airports. This includes providing both airport and transport planning services to Singapore Changi Airport, New York JFK Airport and London Heathrow Airport on major airport masterplans and new terminal development projects within the last 5 years.

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2 Executive Summary

4. Crawley Borough Council has published the DCBLP with an area of Safeguarded Land under Policy GAT2 for a future additional wide-spaced runway at Gatwick Airport. The Plan also allocates 47 ha of previously Safeguarded Land to accommodate an industrial-led Strategic Employment Location (SEL) known as Gatwick Green to meet the long-standing unmet economic needs of the Borough.
5. The Council set out its approach to planning for Gatwick Airport in a Topic Paper (Topic Paper 2: Gatwick Airport, January 2021). This sets out the in-principle case for safeguarding land for a future additional wide-spaced runway but excludes the land to be allocated for Gatwick Green. This is on the grounds it is not needed for critical airport infrastructure and that no robust evidence has been presented to justify its use for a large area of surface car parking.
6. The Aviation Policy Framework (APF, 2013) is Government policy that introduced the need for airports, as critical transport infrastructure, to provide Master Plans. These are to be based on an analysis of options and under GAL's Economic Regulation License are subject to consultation with the local community. The guidance supports the provision of a plan to show land safeguarded for these needs, which the National Planning Policy Framework (NPPF) requires is based on 'robust' evidence of the infrastructure that is 'critical' to the delivery of the expansion scheme. Master Plans form a key part of the evidence for local authorities to prepare local plans, including the designation of safeguarded land in line with national planning policy in the NPPF.
7. Airport Master Plans are required to provide robust forecasts of passenger numbers and air transport movements and translate these into infrastructure requirements and the land needed to accommodate those. The Gatwick Airport Master Plan 2019 (GAMP) contains three plans that relate to the proposed additional wide-spaced runway (Plans 20, 21 and 22). However, in respect of the extent of long-stay car parking, these plans are not supported by the robust analysis and options development work that is required by the NPPF. The Council's Topic Paper is therefore supported in relation to its findings on airport related surface car parking.
8. UK airports are all seeking to achieve an increasing rate of modal shift in passenger surface access from private vehicles to more sustainable modes of transport. These trends can be seen in increasingly ambitious mode-share targets that will continue in the context of the climate crisis. At Gatwick Airport, the share of passengers traveling to the airport by non-car modes of transport is forecast to increase from 44% in 2018, to 48% by 2022. This trend has and will continue to reduce the proportion of passengers that will require long-stay car parking. Consequently, the increase in passenger numbers over time will have a proportionally smaller effect on the need for long-stay airport car parking.
9. There are various considerations for, and approaches to, the provision of airport-related car parking associated with an additional wide-spaced runway at Gatwick. The GAMP describes a short- to medium-term future (5 to 15 years) in which, consistent with these trends and other considerations, there is proportionally less land identified for airport-related long-stay car parking. This is being achieved through

greater modal shift to public transport and denser (more land-efficient) car parking products that are common at UK airports.

10. In contrast, the approach to safeguarding for the long-term future additional wide-spaced runway in the GAMP inconsistently reverts to largely conventional surface car parking, that does not acknowledge the trends in modal shift and recent parking intensification projects that have already been, or are planned to be, undertaken. The approach of safeguarding this land for surface parking does not therefore represent an efficient use of land given that there are more compact alternatives though decked and robotic parking, which the airport is already adopting and are in line with the Airport's Surface Access Strategy.
11. The GAMP contains no robust evidence to justify the extent of land safeguarded for surface car parking, in terms of either demand or design solutions. Given this lack of evidence, the increasing use of alternative modes of surface access and the emerging alternatives to traditional surface car parking, the land occupied by Gatwick Green is not considered to be critical to the delivery of an additional wide-spaced southern runway. No additional evidence to justify the current extent of safeguarding has been seen.
12. The GAMP is GAL's public position on airport expansion and safeguarding for future expansion, required under Government policy. It is therefore reasonable for any public authority to expect the GAMP to justify future land use requirements and policy. In this regard, the GAMP falls short of fulfilling these requirements and accordingly the Council has allocated some of the surface parking area for critical economic infrastructure.
13. In relation to Aerodrome Safeguarding, Gatwick Green is fully compatible with the requirements to protect flight safety from inappropriate developments and protecting third party risk in accordance with DfT Public Safety Zones.
14. In the context of the Airport's Development Consent Order application for short-medium term expansion using the standby runway to expand the airport to 70 MPPA by 2032 (GAMP) and up to 74 MPPA by 2038 (EIA Scoping Report), Gatwick Green is fully compatible with these plans and no concerns have been raised by GAL in its discussions with TWG.
15. Safeguarding considerations associated with highway access to an expanded Gatwick Airport, including additional slip roads from the M23, the diversion of the A23 and access to retained safeguarded long-stay parking areas are addressed in a separate statement appended to representations by Savills on behalf of TWG.
16. Overall, this appendix demonstrates that the development of Gatwick Green would be fully compatible with safeguarding for the development of an additional wide-spaced southern runway (and associated critical infrastructure) and would not hinder the sustainable growth of Gatwick Airport.

3 Airport Master Plans: purpose and scope

17. The Aviation Policy Framework (APF, 2013) provides current Government policy on aviation. The APF notes that the Government recommends that airports continue to prepare Master Plans as a clear statement of intent regarding the future development of an airport so that this can be given due consideration in local planning purposes. Guidance on Airport Master Plans is now contained in the APF, which recommends that the more ground covered and more extensive the consultation, the greater its value in informing future land use, transport and economic planning processes. Airport Master Plans are therefore the key document that should justify the extent of safeguarded land for future expansion.
18. The APF states that whilst Master Plans are not expected to contain detailed engineering drawings, they should “...contain sufficient information, including drawings where appropriate, so that they may be clearly understood by the lay person as well as professionals..”. The APF goes on to state that where long-term land requirements for future development need to be identified, the “...additional land and property involved, including those associated with PSZs and safety surfaces, should be clearly identified to minimise long-term uncertainty and non-statutory blight”. It is therefore clear that **Airport Master Plans are expected to be prepared as the basis for longer term land-use planning (para B.1)**, and that any safeguarded land should minimise long term blight (para B.5).
19. Past and current aviation policy envisages several pre-requisites for Airport Master Plans: (1) to be based on detailed analysis and planning work, (2) to contain sufficient information, and (3) that such land should minimise long-term uncertainty and blight.
20. National planning policy contained in the National Planning Policy Framework (NPPF) adds further important advice on the scope and depth of evidence needed to justify the safeguarding of land for airport expansion. Airport Masterplans are a key evidence source for addressing the requirements of national planning policy. The NPPF states 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; ...*” (para 104(c)). This advice is replicated in the APF (para 5.8).
21. It is therefore important to consider the Gatwick Airport Master Plan and examine whether it contains the robust evidence necessary including analysis into future demand needs, options development, evaluation and selection to justify the extent of land required to accommodate infrastructure that is critical to the expansion proposals. Safeguarding is not justified unless such robust evidence and clear justification is demonstrated.

4 Airport – Safeguarded Land

4.1 Policy Context – GAT2: Safeguarded Land

22. The DCBLP includes a chapter relating to Gatwick Airport, including Policy GAT 2, addressing land safeguarding for a second wide-spaced runway as shown in Figure 4-1 below.

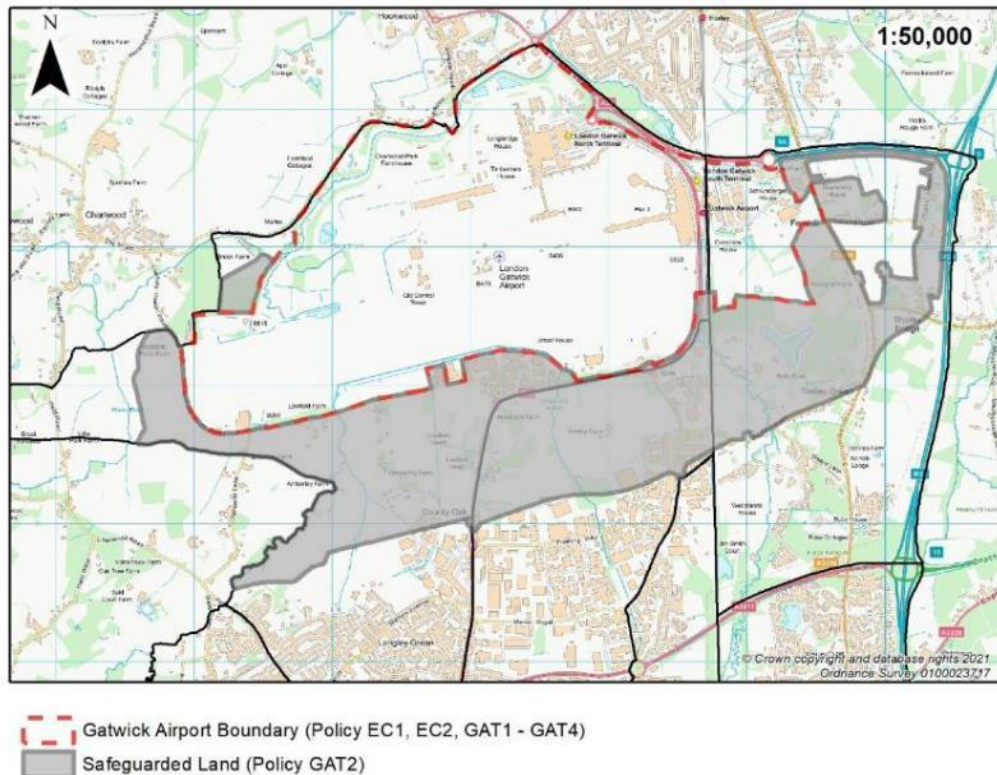


Figure 4-1. Extract from DCBLP showing proposed safeguarding area

23. This is supported by Topic Paper 2 relating to Gatwick Airport, which provides further context regarding aviation safeguarding policy, referencing the national Aviation Policy Framework (APF, 2013) and the National Planning Policy Framework (NPPF, 2019).
24. The DCBLP excludes the Gatwick Green employment site from the safeguarded area, which is shown in Figure 4-1 and justified in the supporting text to Policy GAT2 and in Topic Paper 2. The approach is justified by the need to meet Crawley's economic needs and that surface airport car parking does not represent an efficient use of the land given the availability of more land-efficient options, such as decked and robotic parking (para 3.4.1, Topic Paper 2).
25. The policy framework for safeguarding land outside airports that may be required for future airport development is noted in the main representation on Policy GAT2 by Savills. This appendix focuses on assessing compliance with the NPPF based on the evidence in the GAMP. No other evidence to justify

the extent of current safeguarding has been seen, and the key document where safeguarding needs would be expected to be set out and justified is the Masterplan.

- 26. The NPPF (2019) notes that the means of protecting such land for future airport expansion is local plans. As noted at paragraph 19, it is required that in planning for such protection, land identified for future development should be based on ‘robust’ evidence to justify sites and routes that are ‘critical’ to that infrastructure.
- 27. In summary, the basis for safeguarding land is local plans and safeguarding is not justified unless this NPPF test for ‘robust’ evidence and clear justification as to the ‘critical’ need for infrastructure and extent of land is demonstrated.

4.2 Gatwick Green Development

- 28. The Gatwick Green development proposes to provide a comprehensive industrial-led development of predominantly storage and distribution uses in an area of land to the east of Balcombe Road (Figure 4-2). The DCBLP states that, *“This area excluded from safeguarding is essential to meet Crawley’s employment floorspace needs and is allocated in Policy EC1 as a Strategic Employment Location”*. This is on the grounds that *“Given the constrained land supply within the borough and its significant employment and housing needs the council does not consider surface parking to represent an efficient use of land.”*

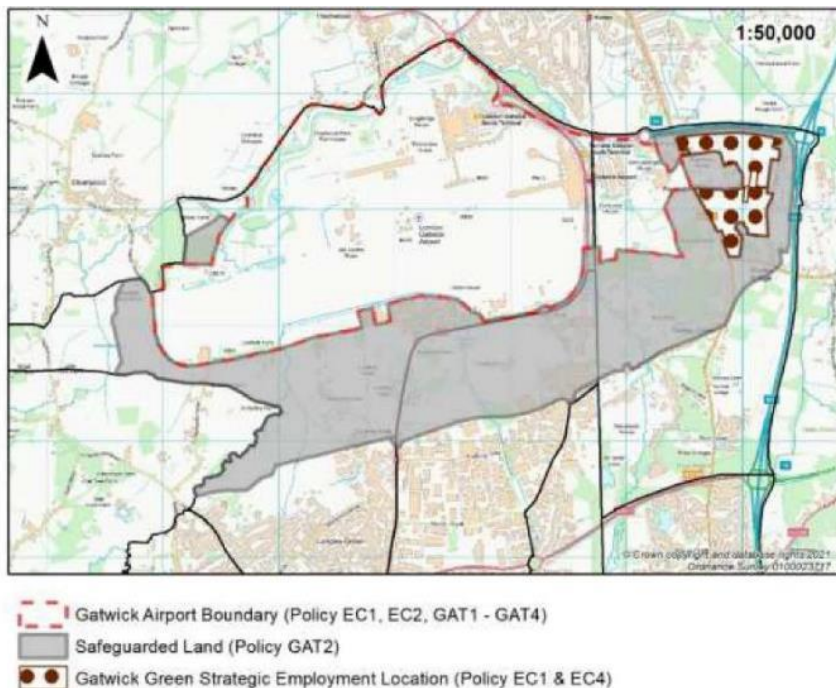


Figure 4-2. Extract from Draft Local Plan showing Strategic Employment Location

4.3 Gatwick Airport Master Plan(s)

4.3.1 Current Gatwick Airport Master Plan (2019)

29. Gatwick Airport Limited (GAL) published its most recent Gatwick Airport Master Plan in 2019 (GAMP). This document describes three possible future scenarios for the growth and development of the airport. Scenario 1 assumes the continuation of the existing single runway operation and indicates growth up to 61 million passengers per annum (MPPA) by 2032. Scenario 2 assumes the existing emergency runway, put into dependent use, could add between 10 and 15 aircraft movements in peak hours, increasing capacity to 70 MPPA by 2032 (GAMP) and up to 74 MPPA by 2038 (EIA Scoping Report). Scenario 3 considers that a new wide-spaced southern runway could be delivered within approximately 10 years of starting the planning process and could take capacity up to 95 MPPA.
30. The GAMP includes clause 5.4.12 regarding southern runway safeguarding that states, “The area of land currently safeguard for the additional runway was based on a much earlier scheme developed by the previous airport owners, BAA. This currently safeguarded area is illustrated in Plan 21.” **Figure 4-3** reproduces the GAMP Safeguarded Land. Figure 4-4 reproduces the conceptual Airport Layout within the Safeguarded Land.

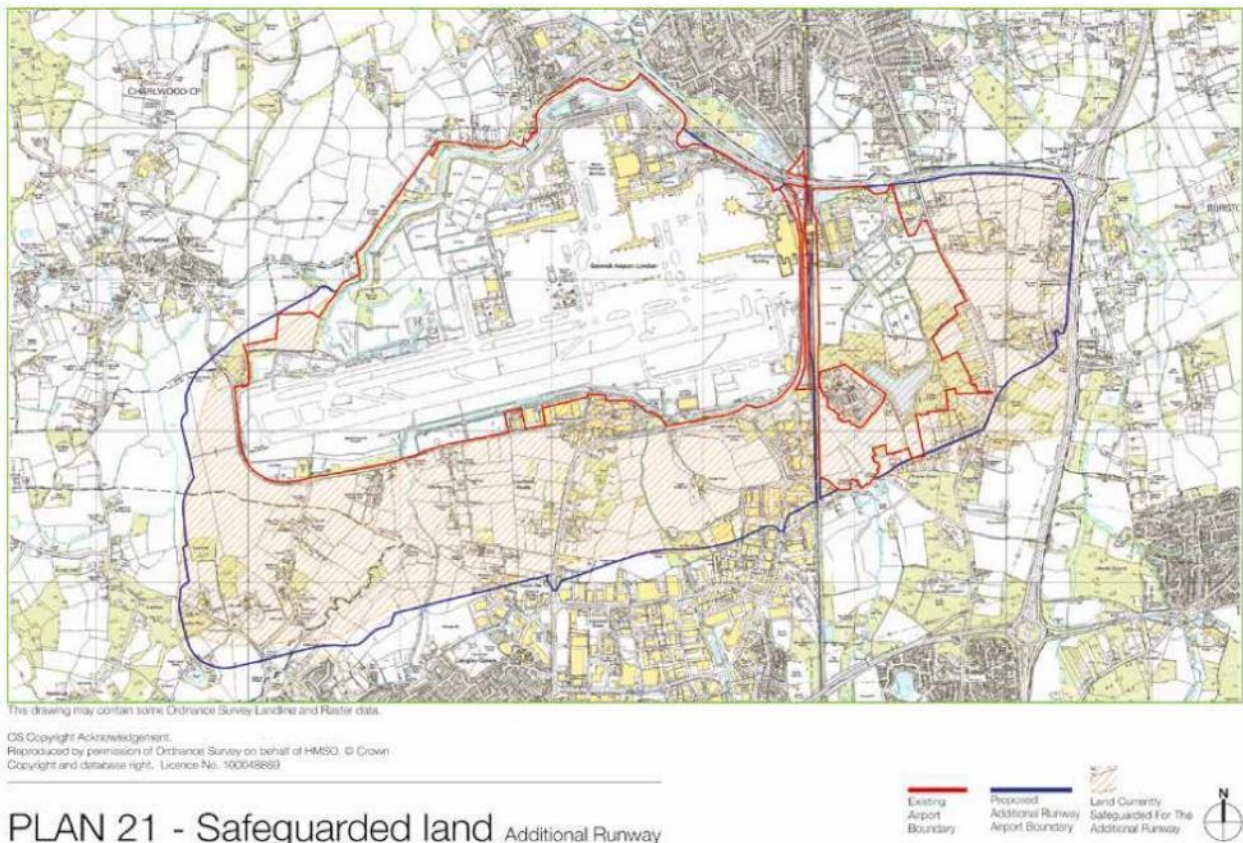


Figure 4-3. Safeguarded Land Extract from Gatwick Airport Master Plan 2019



Figure 4-4. Airport Layout Extract from Gatwick Airport Master Plan 2019

31. The landside transport section of the GAMP (published in 2019) summarises and is based on the preceding Airport Surface Access Strategy (ASAS), published in 2018. The ASAS includes information relating to car-parking provisions and public transport mode share (see section 4.5 below), which includes their ever increasing sustainable transport targets, but the ASAS does not indicate how these might affect the amount of land that may be needed in the future to accommodate car parking related to the decreasing proportion of passengers that will travel to the airport by private car.
32. GAL has initiated a DCO process related to plans to put the Emergency Runway into continuous operational use. The government site for National Infrastructure Planning indicates that this is at pre-application stage, with EIA scoping reports having been submitted in September 2019. The scoping report indicates that GAL is pursuing Scenario 2 (emergency runway use), and not actively pursuing Scenario 3 (additional wide-spaced runway) but nevertheless GAL considers it in the national interest for land to continue to be safeguarded.

4.3.2 History of Master Plans for Gatwick Airport

33. In justification for the extent of land safeguarding for a future additional wide-spaced runway, the GAMP refers back to earlier Master Plans in clause 5.4.12, *“The area of land currently safeguard for the additional runway was based on a much earlier scheme developed by the previous airport owners, BAA.*
34. GAL published previous Airport Master Plans in 2005 and 2012. The 2005 Master Plan states, *“The area required for landside airport facilities to the east of the railway needs to be substantially extended, primarily for car parking and road access to the new (third) terminal.”* and, *“The boundary to the east of the railway corresponds with that indicated in the White Paper.”* The 2012 Master Plan references safeguarding for a second runway stating, *“The area for landside airport facilities to the east of the railway would need to be substantially extended to accommodate a transport interchange (including areas for coach parking and car rental), car parks **and front line ancillary facilities such as offices and hotels.**”* It should be noted that front line ancillary facilities such as offices and hotels are not referenced in the later GAMP 2019 as part of the basis for land safeguarding. Of critical importance is that these earlier Master Plans, like the GAMP, do not provide ‘robust evidence’ to justify the extent of land required for safeguarding for future car-parking needs. Nor is such evidence contained in the surface access strategy for Gatwick Airport (Airport Surface Access Strategy - ASAS, May 2018), which predated the GAMP.
35. The safeguarded land associated with a wide-spaced runway originated in the Aviation White Paper (The Future of Air Transport, DfT, 2003), which has since been withdrawn. This paper did not include any justification for an extent of safeguarded land, but did state, *“It must be stressed that the map was only indicative, pending detailed design work and submission of a planning application by the operator. The map should not therefore be taken to be a formal safeguarding map.”*
36. It is apparent that in all the published Airport Master Plans (2005, 2012, 2019) and also in the Airport Surface Access Strategy (2018), there is no explicit or evidenced design rationale for the extent of safeguarded land for car parking areas associated with an additional wide-spaced runway. The high-level plans provide the only basis for the extent of safeguarding, and in respect of land for long-stay parking, there is no assessment of need, alternative options development, evaluation and selection, as would constitute a rigorous master plan process. As such, **the criterion for robust evidence in the NPPF is not considered to have been met.**

4.4 Gatwick Airport – Car Parking Trends

37. The number of car parking spaces at Gatwick has been increased since the publication of the 2005 Master Plan. The projected demand for parking has also been updated with each subsequent Master Plan.

Table 4-1 History of Existing and Projected Demand for Car Parking at Gatwick

		2005 Master Plan		2012 Master Plan		2019 Master Plan	
		Existing	2015 Demand Projection	Existing	2020 Demand Projection (40 MPPA)	Existing	2023 Demand Projection
Short-Stay		4,100	4,720	4,960	6,500	4,902	9,402
Long-Stay (inc. Valet and 'holiday')	On Airport	27,134	30,000	28,855	30,000	34,098	39,163
	Off Airport Approved	21,350	21,350	-	-	21,200	21,200
	Un-approved	2,400	-	5,800	Decreased	-	-
	Sub-total	50,862	51,350	-	-	55,298	60,363
Staff		-	10,000	7,000	-	6,200	6,200
TOTAL		54,962 (exc. Staff)	66,070	33,815 (exc. staff & off-airport)	+6,000 by 2020	60,200	69,765

38. The previous Master Plans show a trend of increasing parking provision to support growth in air-traffic. This is summarised in the GAMP as a growth of 19.5% from 32,640 public spaces in summer 2010 to 39,000 spaces in summer 2017. Unapproved off-airport parking has been reduced, while more intensified car parking arrangements have been accommodated within the Airport's operational area.
39. In each case, there has been a predicted growth in demand over the following 5 to 10 years. This has been accommodated within the existing land ownership boundary through a variety of measures to intensify the parking density on the site. For example, the 2012 Master Plan stated, *"These additional spaces are expected to be provided by a mixture of decking and multi-storey car park construction on the site of existing surface car parks"*.
40. Similarly, the GAMP describes recent and planned car parking projects that continue this intensification trend further within the next 5 years; *"We have recently completed a project to deck part of South Terminal's long-stay car parking to provide an additional 1,565 spaces..."* and *"we have identified two sites for additional multi-storey car parking, one at each terminal. MSCP 7 would create approximately 3,000 spaces in a multi-storey structure on the site of a current staff car park located just to the north of North Terminal. MSCP4 at the South Terminal would create approximately 1,500 spaces..."*. Combined with *"3,500 spaces delivered by consolidation of our long-stay self-park product into one site and optimising the configuration of current storage areas"* these projects *"deliver 9,565 extra spaces throughout the period, or an increase of 24.5% from 2017 capacity"*.
41. Looking forward, the GAMP indicates that the same approach would be followed for longer-term growth over the next 15 years (corresponding to a capacity range of 57 to 61 MPPA); *"Additional car parking, or*

parking required to replace existing spaces lost owing to other developments, can be provided by decking more of the long stay car parks at North and South Terminals, as required. We are also exploring the use of machine assisted parking technology in the longer term to increase the capacity and utilisation of existing car parks.”

- 42. The EIA scoping report for the emergency runway DCO describes that “approximately 46,700 parking spaces were available in summer 2018 within the airport boundary” (including staff parking) and a further 21,196 authorised spaces off-airport. Projects to increase car-parking associated with the application include, “a new multi-story car parking capacity: 4,250 spaces” and “Use of robotics technology within existing long stay parking areas resulting in an additional 2,500 spaces”. This would result in a total of 53,450 spaces on-airport.
- 43. The total provision of new parking also considers; “to replace existing parking spaces, lost due to development associated with the Project” ... “The overall net increase in car parking spaces would be approximately 17,500”. Existing and new parking areas are shown in Figure 4-5 in green and purple respectively.

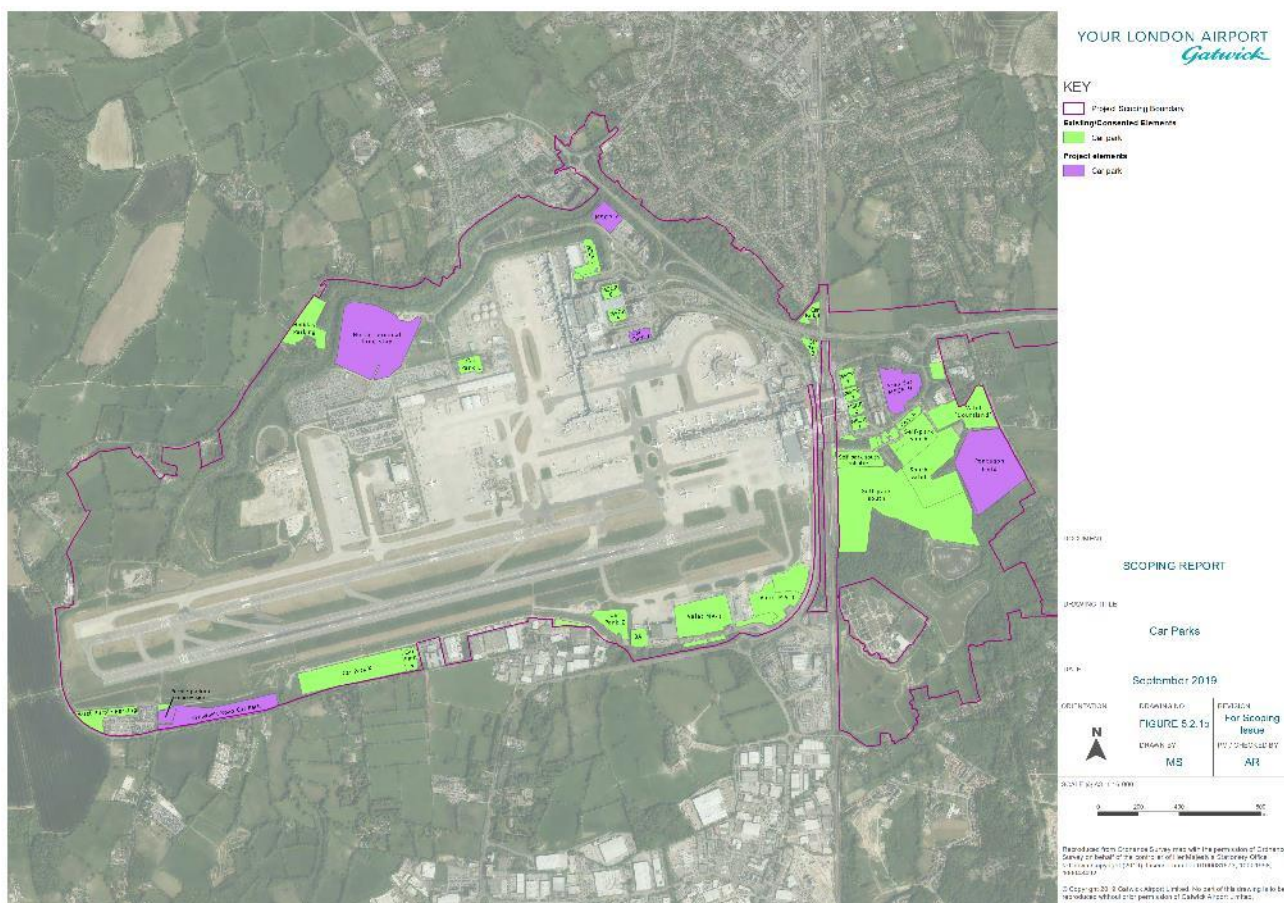


Figure 4-5. Existing and Project car-parking – EIA scoping report, Volume 2, Figures.

- 44. There are a number of trends in car parking provision under the DCO that should be highlighted including the ratio of parking spaces to airport passengers and staff; the correlation with mode-share shift and

targets; the relative ratio of short-stay and long-stay parking, and the intensification of parking density through decking, MSCPs, configuration optimisation and robotic parking systems.

- 45. It is clear from these trends that considerable increases in car-parking provision have been achieved since the 2005 Master Plan (31,234 passengers + 7,200 staff) to summer 2018 (39,000 + 6,200 staff), with a further 9,565 spaces planned (GAMP 2019) up to a total of 17,500 new and replacement (EIA scoping). This has been achieved within the airport boundary (with a further 22,000 authorised spaces off-airport) enabling growth from 32.8 MPPA to a throughput of 46.4 MPPA in 2018 and more than doubling to a planned capacity of 70 MPPA by 2032 (GAMP) and up to 74 MPPA by 2038 (EIA Scoping Report).
- 46. The land safeguarded for a wide-spaced runway to the south was first established in the Aviation White Paper in 2003 and has been carried forward with some adjustments through Airport Master Plans to date. It is apparent that the extent of the Safeguarded Land in the GAMP has not considered the achievements described above, including the intensification of car-parking land-use within the existing airport boundary between 2005 and 2032.

4.5 Gatwick Airport – Sustainable Transport Mode Share

- 47. GAL has emphasised its commitment to a sustainable transport policy in its ASAS (2018);, *“Gatwick’s commitments are to improve our public transport mode share for passengers and staff, provide sustainable travel choices and reduce the environmental impacts of surface access”* and in the GAMP, *“We expect to be held to our commitment to promote sustainable travel for our passengers and staff, and we will work with our partners and service providers to deliver safe and efficient access 24 hours a day, seven days a week”*.

Table 4-2. History of Mode Share at Gatwick

	2004	2011	2017
Private Car	51.7%	42.4%	38.6%
Hire Car	2.3%	1.8%	0.9%
Taxi	15%	13.3%	15.4%
Bus/Coach	6.8%	6.7%	5.9%
Rail	24%	35.5%	39%
Other	-	0.3%	0.2%

Source: 2005, 2012 Master Plans and 2018 ASAS, referencing CAA passenger surveys in preceding years

- 48. The historical trend of a mode share shift towards public transport is apparent from the recent and past published Airport Master Plans. While taxi, bus and coach use has not altered significantly, the biggest transition is to rail (up by 15% over 13 years) and away from private cars (down by 13% in the same timeframe).
- 49. In 2012, it was stated that of the 42.4% using private cars, *“Car parking is an essential function of the airport operation with around 22% of passengers accessing the airport by a private car, which is parked here”*.

50. This led to GAL setting targets in the GAMP to further progress this trend of mode-share shift, as shown in Figure 4-6. This has in effect superseded the earlier mode share targets contained in the ASAS to 2022 and noted at paragraph 34. These include rail to increase to 45% by 2030, an increase in use of bus and coach by staff and passengers, and a reduction in staff parking spaces, all corresponding to sustainable travel initiatives.

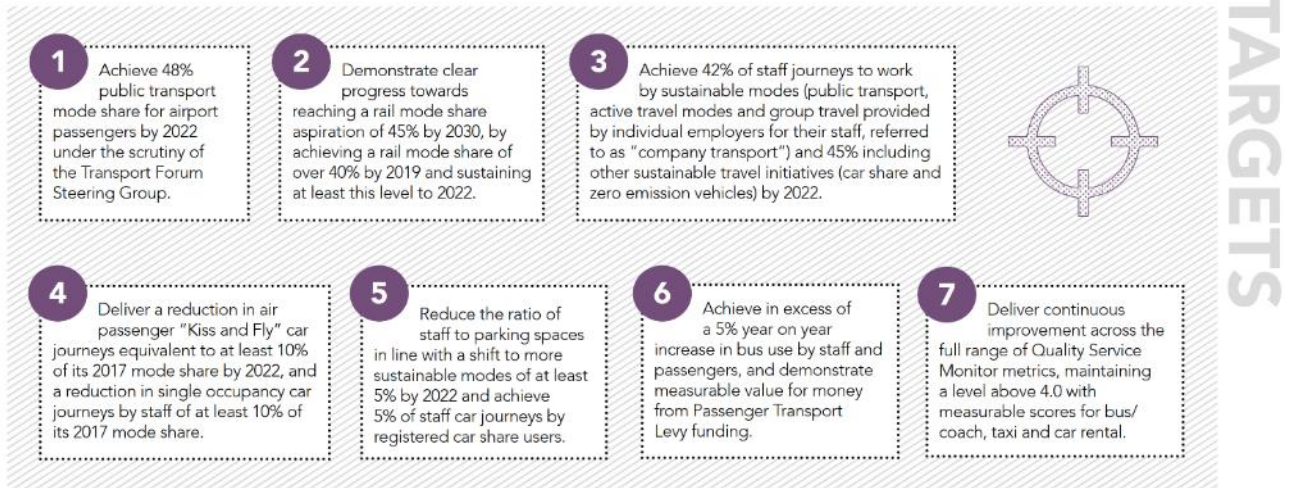


Figure 4-6. Mode share targets, extracted from GAMP 2019

51. During the independent Airports Commission study, each of the sites made submissions to outline their proposals to deliver additional runway capacity. GAL's submissions included an indication of its plans for Surface Access that stated; "Gatwick will achieve the highest use of sustainable modes of transport: it will achieve a 60% public transport mode share for customers (46m by 2050) and a 50% sustainable mode share for staff". These were illustrated in the graphs shown in Figure 4-7 and Figure 4-8:

FIGURE 1: CHANGE IN MODE SHARE (AIR PASSENGERS)

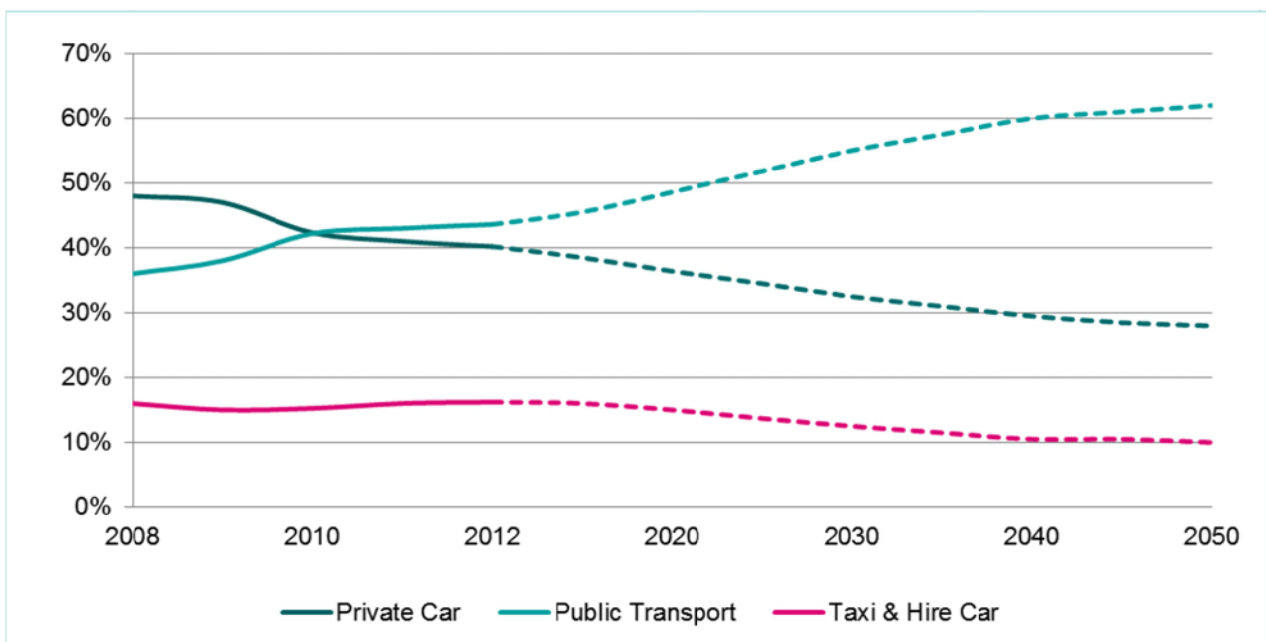


Figure 4-7. Mode share targets, extracted from SD6 Surface Access submitted to Airports Commission

FIGURE 2: CHANGE IN MODE SHARE (EMPLOYEES)

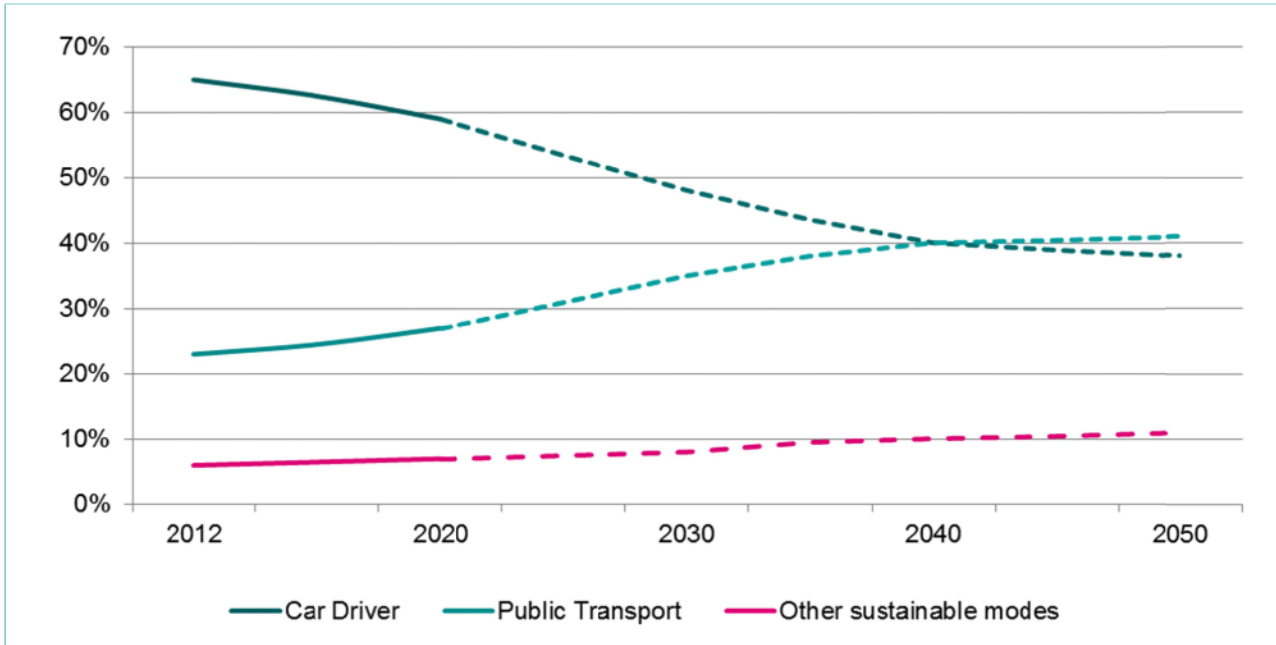


Figure 4-8. Mode share targets, extracted from SD6 Surface Access submitted to Airports Commission

52. Significant progress has been made since 2004 in improving the public transport mode share from 31% in 2004 (bus/coach and rail) to 45% in 2017 for passengers. Targets associated with the development of a wide-spaced runway to the south aim to continue to improve to over 60% by public transport for passengers and over 50% for staff (up from 30% in 2012). All of this contributes to a decreasing dependency on surface access by private car (and thereby parking) by passengers and staff as a mode share percentage that offsets any growth in air-traffic.
53. This significant change has taken place since the Aviation White Paper in 2003 and should also be considered when updating any assessment of the land area required to be safeguarded for landside infrastructure for surface access associated with an additional wide-spaced runway to the south.

4.6 Airport Industry Trends in Car Park Intensification

54. Airports typically cover considerable land areas, and within landside areas car parking is one of the significant drivers of land-use, of which a significant proportion of this can be surface parking for long-stay. Airports are also in the relatively unique position of firstly knowing that many of these cars are going to be parked for a considerable period (from days to weeks) and having predictability of when the vehicles will require to be collected/accessed from booking systems. This enables unique opportunities for land-use efficiency, which have been adopted (due to valid business cases) at airports around the UK. The following paragraphs note some examples.
55. Block parking is a system in which vehicles that do not need to be accessed for a finite period can be arranged in a dense grid without the need for circulation roadways (that can accommodate shuttle buses) that are typical of surface parking. This is often used for valet products and could also be applied to long-stay car parks with appropriate management. Figure 4-9 shows an example from Manchester Airport.



Figure 4-9. Example of block parking at Manchester Airport, UK

56. Robotic parking is a further evolution of block parking. This approach uses robots to position cars in a grid array in a similar fashion to block parking. However, because there is not a valet driver who needs to exit the vehicle by opening the doors, it is possible to arrange cars with a smaller gap between adjacent vehicles. The robotic technology has been developed and has been trialled at Charles de Gaul Airport in Paris and at Gatwick Airport, which Stanley Robotics reports to achieve 50% more vehicles within the same area relative to conventional surface parking. Figure 4-10 shows an example image.



Figure 4-10. Example of robotic parking

57. Decked car-parking provides a low-cost, light-weight structural solution that typically allows for an increase in parking density by creating a relatively easily accessible second level of parking, roughly doubling the number of cars that can be accommodated each area.
58. Multi-storey car parks offer the greatest number of vehicles in a given area. They are typically used for short-stay applications at airports where space and land-value are at a premium. However, this is not universally the case. An important and clearly relevant case study can be seen in the Heathrow public consultation documents that were publicly available during preparations for the 3rd runway DCO application. In this case, the northern and western parkway options were proposed as multi-storey long-stay car parks, in the context where additional land was to be obtained through Compulsory Purchase Orders to enable the development of a new runway and associated infrastructure. While multi-storey car parks are more expensive than surface car parks, they clearly reduce the amount of land that is required for long-stay car-parking. Figure 4-11 shows location options considered for these long-stay car parks. It may also be possible to combine block/robotic parking and decking to further the intensification potential of airport passenger parking, and in turn a reduction in land needed.

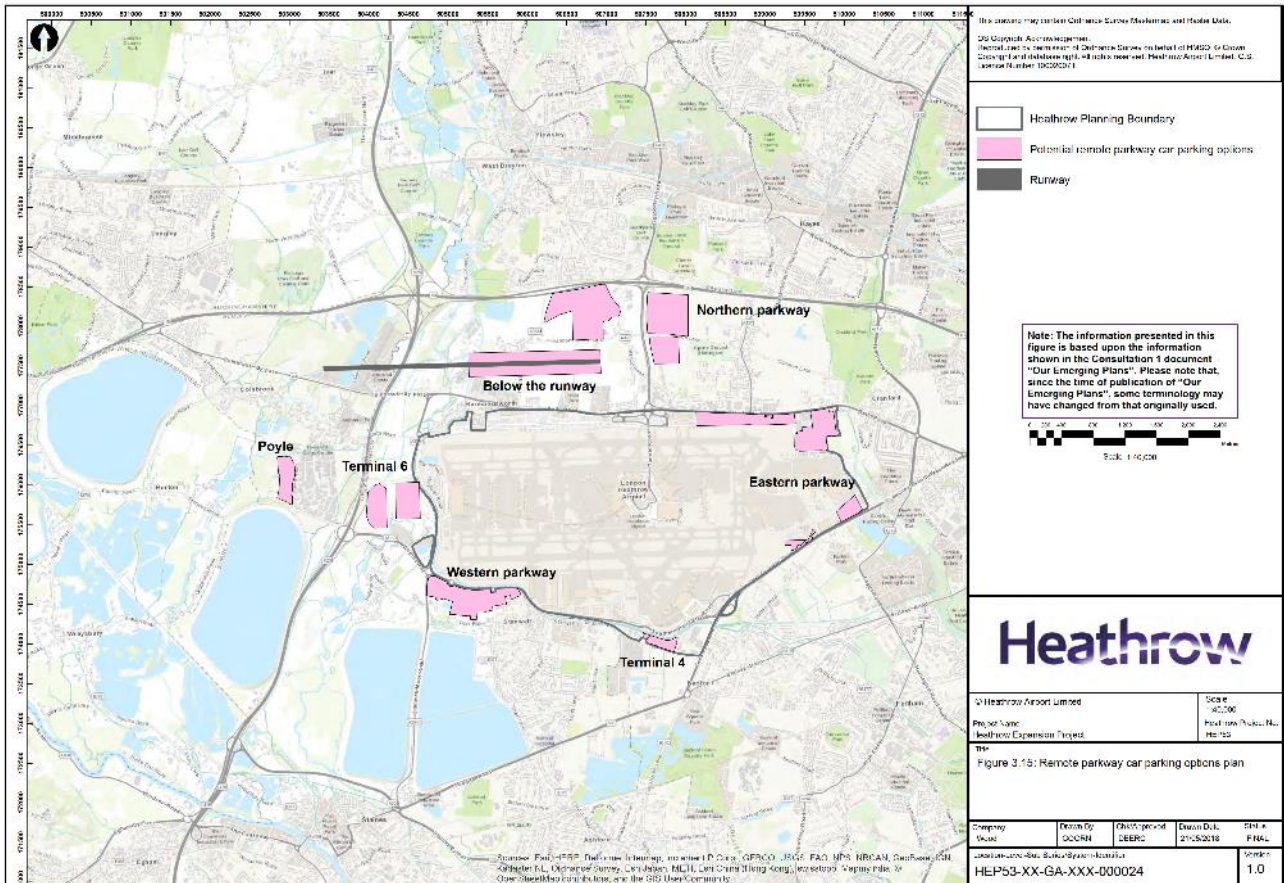


Figure 4-11. Sites considered for long-stay car parking in the Heathrow 3rd runway EIA scoping report

59. All these examples provide case studies of ways in which car-parking land use can be intensified in an airport context. It is also important to note that many of these options have been adopted by Gatwick Airport in the recent past and form part of its plans for future growth, including the emergency runway DCO application, while remaining within its existing operational/land-ownership boundary. These innovative and more intense parking arrangements could equally be applied to the Airport's further growth as part of its wide-spaced southern runway proposals.

4.7 Conclusions – GAT2: Safeguarded Land

60. Safeguarded land is required to protect for a future additional wide-spaced runway to the south of the existing airport. It is recognised that this expansion of the airport would require the development of a new terminal building and associated surface access infrastructure.
61. The extent of the land required for long-stay car parking – for the increase in capacity from 74 MPPA to 95 MPPA and to replace existing car parking facilities displaced by other airport land-uses – has **not been demonstrated with robust evidence to satisfy the requirements of the NPPF**.
62. This appendix has considered the significant developments in car parking provision since the DfT Aviation White Paper was produced in 2003. This includes considerations associated with **sustainable transport policy**; trends in **mode share shift to public transport** and the targets to progress these further to meet the objectives of the Airports Commission; the **intensification of car parking land-use** that has taken place and is planned under the DCO scoping proposals at Gatwick within existing land, block parking and valet parking products successfully adopted at other UK airports and finally the **automated parking products and solutions** that are available for use today that would enable further intensification of long-stay parking.
63. The GAMP provides no robust evidence to support the extent of land safeguarded for surface car parking: on the contrary, trends in automated and multi-storey parking point clearly to the ability of GAL to accommodate its parking requirements in a significantly reduced safeguarded area. Furthermore, the Gatwick Green development does not block or prevent any critical infrastructure (such as runways, railways, terminals, new or diverted primary access roads) that are fundamentally required to be safeguarded for an additional wide-spaced runway to the south of the existing airport.
64. Taking all these factors into account Gatwick Green cannot be considered an incompatible development as it does not hinder sustainable aviation growth at Gatwick Airport. It is therefore fully compatible with any policy requirement to safeguard land for future national requirements. It also cannot be an inappropriate development, given the long-standing requirement for Strategic Employment Locations now addressed by the allocation of Gatwick Green in Strategic Policy EC1.
65. As such, the Gatwick Green allocation is entirely consistent with the policy and guidance on safeguarding for transport / aviation infrastructure contained in the NPPF (2019), the APF (2013) and the draft Aviation Strategy (2018).
66. The GAMP fails to justify safeguarding of the extent in the current adopted Policy GAT2 (adopted DCBLP, 2015). In the absence of such robust evidence, there is no case to justify the need for the Gatwick Green land for surface car parking as it is not critical to delivering the airport's infrastructure.

5 Aerodrome Safeguarding

67. This section focuses on the compliance of the Gatwick Green industrial-led proposal as provided for in the allocation in the DCBLP (Strategic Policy EC4) with the Gatwick Airport Public Safety Zones (PSZs).

5.1 Compliance with Public Safety Zone requirements

68. Public Safety Zones (PSZs) are areas of land at the ends of the runways at the busy airports, where restrictions are in place to reduce the risk of death or injury in the event of an aircraft accident on take-off or landing. These restrictions relate to development to avoid high density or high frequency uses within the higher risk zones.

5.1.1 Risk Contours & Permissible Development

69. In a previous report produced by Arup (*Gatwick Green-BAA Interim Master Plan Review Study, December 2006*), the PSZs are shown for Gatwick Airport. The report states that the PSZs were derived from the DfT white paper consultation document (*SERAS Stage Three: Appraisal of Findings Report, Figure 2.2, Option E1B*) prepared by Halcrow. An extract of the PSZs is shown in Figure 5-1. Of the three risk contours in the Arup report, only the 1:100,000 and 1:1,000,000 PSZ risk contours extend across the Gatwick Green site:

- a. The 1:100,000 PSZ covers only part of the development site situated either side of Fernhill Road.
- b. The 1:1,000,000 PSZ covers the entire Gatwick Green development site.

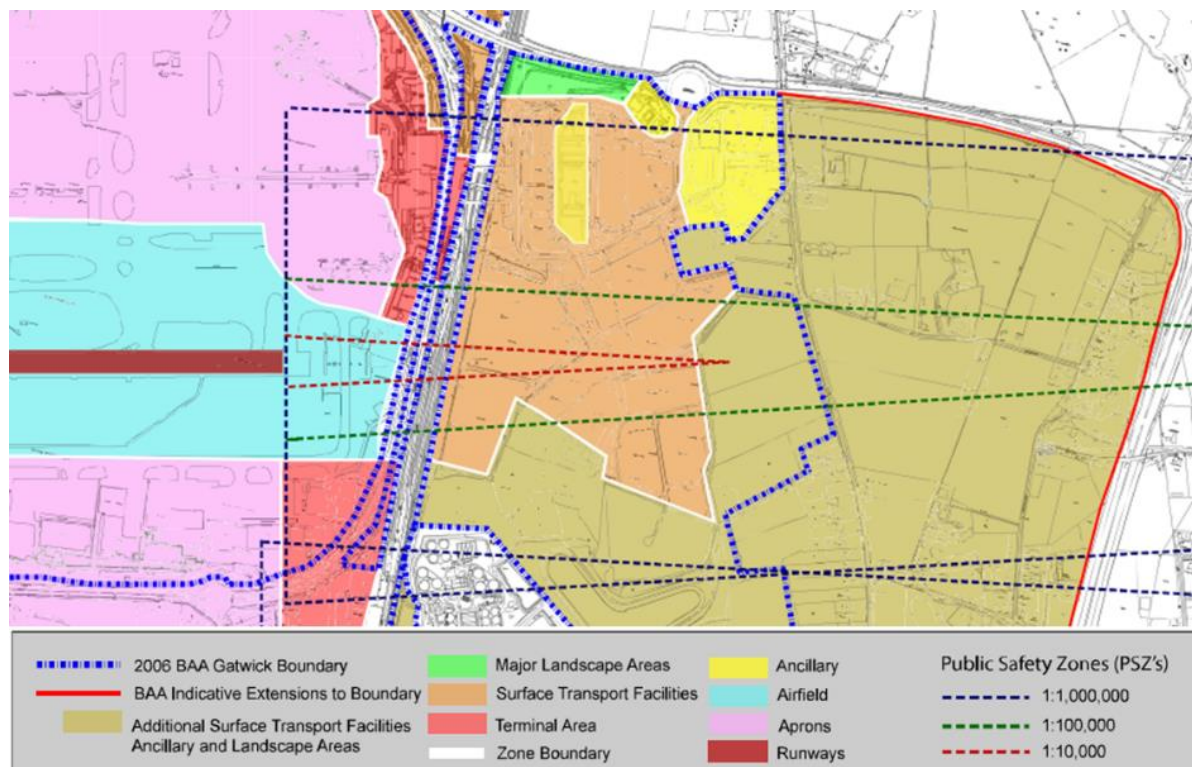


Figure 5-1. Public Safety Zones for Gatwick Airport

Extract from the Gatwick Green-BAA Interim Master Plan Review Study, December 2006

70. This report provides a description of the limitations on development uses within these two risk contours that were published by DfT at the time of the report in 2006, as follows:
- a. Permitted use within the 1:100,000 individual risk contour includes long stay car parking, open storage and low occupancy warehouses, low occupancy buildings for plant and machinery, and low intensity use public spaces.
 - b. Permitted use within the 1:1,000,000 individual risk contour: any land uses, except high density land uses such as schools, hospitals and places of assembly that should generally be located outside the 10^{-6} (1 in 1,000,000) contour, but considered on a case-by-case basis.
71. In summary, land uses are restricted in a small part of the Gatwick Green site within the 1:100,000 risk contour, and unrestricted in the area outside this contour. In the DfT Circular 'Control of Development in Airport Public Safety Zones' published in March 2010, updates are provided to the permissible development uses within the 1:100,000 risk contour and outside of the 1:10,000 risk contour (which at Gatwick lies within the airport boundary). This update excludes extensions and changes of use for new or replacement development, which involve a low density of people living, working or congregating – the changes are as follows:
- a. Change of use of land should not increase the number of people living, working, or congregating in or at the property or land beyond the current level or, if greater, the number authorised by any extant planning permission. There is a general presumption against new developments (residential and non-residential) within Public Safety Zones (1:100,000 risk contour) with the following exceptions:
 - i. Long stay and employee car parking where minimum stay is expected to exceed six hours.
 - ii. Open storage and certain types of warehouse development in which a small number of people are likely to be present within a sizable site. This would exclude development for more intensive uses, such as distribution centres, sorting depots and retail warehouses.
 - iii. Development of a kind likely to introduce very few people on to the site on a regular basis such as unmanned structures, and buildings housing plant or machinery.
 - iv. Public open space, in cases where there is a reasonable expectation of low intensity use. This would exclude children's playgrounds or sports grounds.
 - b. Development Permissible within the 1:100,000 Public Safety Zone includes:
 - i. Long stay and employee car parking where minimum stay is expected to exceed six hours.
 - ii. Open storage and certain types of warehouse development in which a small number of people are likely to be present within a sizable site. This would exclude development for more intensive uses, such as distribution centres, sorting depots and retail warehouses.
 - iii. Development of a kind likely to introduce very few people on to the site on a regular basis such as unmanned structures, and buildings housing plant or machinery.
 - iv. Public open space, in cases where there is a reasonable expectation of low intensity use. This would exclude children's playgrounds or sports grounds.
 - c. The planning of new Transport Infrastructure within the 1:100,000 risk contour requires careful consideration of the type and intensity of use:
 - i. New transport infrastructure such as railway stations, bus stations and park and ride schemes should not be permitted within Public Safety Zones, as they would result in a concentration of people for long periods of the day.
 - ii. Although people passing along a transport route are likely to be within the PSZ for only a very small part of the day, the average density of occupation within the zone may be significant. Major roads and motorways should be assessed in terms of the average density of people.
 - iii. Low intensity transport infrastructure, such as minor or local roads, can be permitted within PSZs.

iv. Careful attention should be given to the location of major road junctions and to related features such as traffic lights and roundabouts, which may lead to an increase in the number of stationary vehicles within the PSZ.

72. Overall, these changes have no impact on development at Gatwick Green outside the 1:100,000 risk contour. The changes therefor apply to the small part of the Gatwick Green site within the 1:100,000 risk contour.

5.1.2 Application to and considerations for the Gatwick Green Development Framework Plan

73. The Gatwick Green Development Framework Plan (DFP) shown in Figure 5-2 below, shows the potential developable area, proposed access points and perimeter / core landscape buffers. The 1:100,000 PSZ depicted by the dashed black line, is an extract from the DfT White Paper referred to in paragraph 69.



Figure 5-2. Gatwick Green: Development Framework Plan

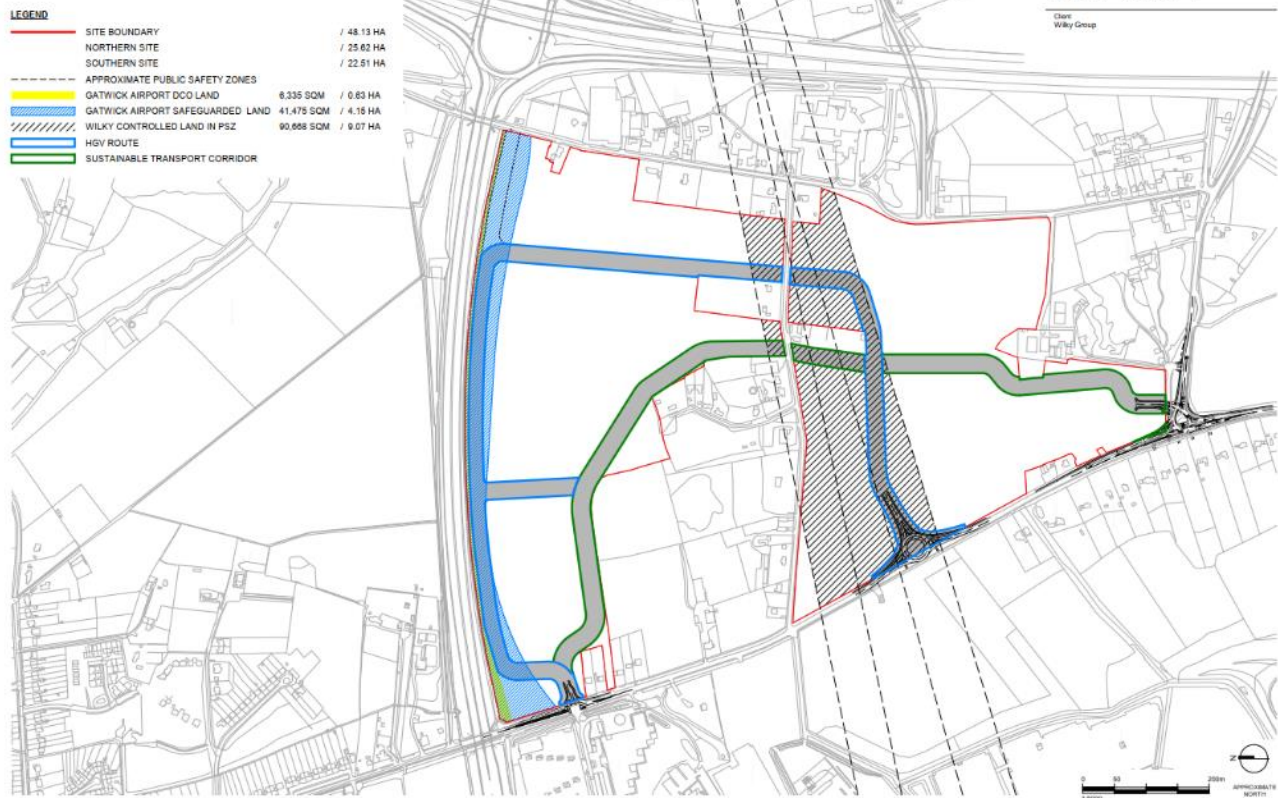


Figure 5-3. Gatwick Green: Highway and Access Arrangements

74. The DFP will not include any new non-residential building plots within this zone, which is appropriate.
75. Some staff car-parking is likely to be included within the PSZ, which is compatible with the DfT regulation, provided that such is used for long-stay and employee car-parking where the minimum stay is expected to exceed six hours, i.e. this would be acceptable for regular commuting for a daily shift pattern, but would not be considered appropriate for short-stay or visitor parking.
76. The local roads within the Gatwick Green development are likely to fall into the description of 'minor or local roads', which are therefore permitted within and crossing the PSZ.
77. The roundabouts (or signalised junctions) within the PSZ could lead to an increase in the number of stationary (occupied) vehicles and would therefore need to be further assessed with regard to the intensity / density of people within the PSZ to demonstrate compatibility with the DfT guidelines. Relatively little congestion on these local roads would not be an issue but would need to be confirmed following a traffic assessment.
78. A significant grade-separated roundabout is proposed on the diverted A23, within the Gatwick Airport highway scheme in GAL's submissions to the Airports Commission (relating to a new wide-spaced runway to the south of the existing airport). This is located within the PSZ.

79. While this roundabout does not form a part of the Gatwick Green DFP, it could potentially be used as a future means of access to the Gatwick Green development. The roundabout is shown in the GAMP in the context of the DfT guidelines on PSZs.
80. As the Gatwick Green masterplan is developed as part of an outline planning application, further consideration can be given to whether other non-intense uses could be accommodated within the PSZ as being compatible with the DfT guidelines described above. Examples of other permissible uses could include:
- a. Unoccupied buildings such as sub-stations or other infrastructure plant.
 - b. Drainage swales, reed beds or dry surface water attenuation ponds for rainfall attenuation, as part of a Sustainable Urban Drainage Scheme (SUDS), provided that any wet ponds are netted (if applicable) to mitigate the risk of bird strike hazard.
 - c. Other landscaping features / biodiversity, provided that they do not encourage a high intensity of use by people (such as play-grounds or sports fields), or act as an attractant to birds (such as a food source or nesting grounds).
81. It is worth noting that the required size of PSZ risk contours are generated from risk-based analyses that are undertaken every 7 years and are based on forecast air-traffic for the next 15 years, combined with historical accident data regarding the probability of air traffic accidents and typical impact areas.
82. Over time, aircraft accidents have become increasingly rare (despite growing air-traffic) as aircraft technology and systems have improved flight performance in terms of safety and reliability, particularly with the fleet replacement to new aircraft types. PSZs have not changed significantly in the UK in the last decade, which has led to a review of PSZ policy. Globally, there is an initiative to reduce the protection areas around aerodromes to take account of the flight and safety performance of airports and new aircraft types.

5.2 Other Aerodrome Safeguarding Requirements

83. There are general aerodrome safeguarding requirements that must be considered for developments near airports. These include:
- a. Bird strike hazards
 - b. Dangerous and confusing lights
 - c. Obstacle limitation surfaces
84. Gatwick Green will ensure that bird strike hazards are mitigated by considering all reasonable measures to discourage birds from gathering under the departure and arrival flights paths of Gatwick Airport. Such measures could include netting any open sources of water and avoiding vegetation that would be an attractive food source.
85. Dangerous and confusing lights refer to general glare and glare from directional lighting, but more importantly lasers because brief exposure can cause temporary blindness. This will be considered in the design of Gatwick Green to ensure dangerous lighting risks are avoided or mitigated.
86. Obstacle limitation surfaces that are applicable to Gatwick Green are the departure and arrival surfaces which prevent tall buildings from being built in the path of arriving and departing aircraft. This will be considered to ensure that any buildings do not infringe these surfaces, including temporary obstacles such as cranes during construction.

5.3 Conclusions – Aerodrome Safeguarding

87. The PSZ risk contours that are applicable to the Gatwick Green site have been identified. It has been demonstrated that the permitted uses related to the PSZs are well understood and that the development of Gatwick Green as an industrial-led scheme for predominately storage and distribution uses with ancillary offices, leisure and retail uses could be comfortably designed to be compliant.
88. The general aerodrome safeguarding requirements applicable to Gatwick Green have been identified and these will be considered to ensure that the Gatwick Green development will be compliant.

6 Accommodating the airport expansion DCO requirements

89. GAL are in the process of applying for a Development Consent Order (DCO) to convert its standby runway (also referred to as its emergency runway) to an operational runway for regular use in dependent operating modes with the existing main runway. A review of the DCO proposals has indicated that there are no conflicts between the Airport's standby runway expansion plans and Gatwick Green.

7 Conclusions

90. A review has been undertaken in relation to the future need for safeguarded land for airport-related car parking; the limitation on land uses and development within the PSZs; the requirements of the current airport expansion plans under the DCO, and considerations on aerodrome safeguarding. These reviews have concluded as follows:

- a) The Aviation Policy Framework introduced the need for airports, as critical transport infrastructure, to identify future airport expansion needs. It recommends that airports continue to prepare Master Plans as a clear statement of intent so that this can be given due consideration in local planning purposes.
- b) The National Planning Policy Framework (NPPF) states that there must be 'robust evidence' to identify and protect sites and routes 'critical' to developing transport infrastructure to widen choice and realise opportunities for large scale development.
- c) An Airport Master Plan should provide the robust evidence to justify the requirements for safeguarded land for infrastructure that is critical to the expansion of the airport via a new runway.
- d) The Gatwick Airport Master Plan, published in 2019, indicates an area of safeguarded land for a future additional wide-spaced runway to the south of the existing airport, including an extensive area indicated for surface long-stay car parking between the London-Brighton mainline and the M23. It does not include any analysis or justification for the extent of this land area, instead deferring to preceding Master Plans, that also omit these details.
- e) In the recent past, two trends have dominated car parking requirements at Gatwick Airport, both of which are intended to be progressed further in current plans and targets. Firstly, there has been a significant improvement in modal shift to public transport principally from private cars to rail. Secondly, that additional car parking required to support growth in air traffic has been accommodated within existing airport owned land though the intensification of parking. GAL intends to continue both these trends to support anticipated growth over the next 15 years.
- f) There is no robust evidence available to justify the current extent of surface parking, that was initially indicated over 15 years ago. The Airport Masterplan of 2019, and hence the apparent justification for safeguarding, was not updated to take into account the well-established and continuing trends of a shift to sustainable public transport, parking density, valet parking and more recent innovative automated parking products that are more land-efficient.
- g) GAL's approach of safeguarding for surface parking in its Master Plan does not represent an efficient use of land given that there are more land-efficient alternatives including valet, block, decked and robotic parking. Whilst the airport is already adopting some of these more

efficient parking methods and these are included in the Airport's stated sustainable transport / surface access strategy, there is no reference to these efficiencies in the plan shown for extensive surface parking for the wide-spaced runway. This evidence supports the Council's decision to remove part of this land proposed for safeguarding for extensive surface car parking and instead allocate it for an industrial-led development to meet critical unmet needs is fully justified.

h) The Gatwick Green allocation is also considered to be compatible with the future development of the airport for the following reasons:

- It does not block or prevent any critical infrastructure (such as runways, railways, roads or terminal buildings) that are required to safeguard for an additional wide-spaced runway to the south of the existing airport.
- It does not hinder sustainable aviation growth at Gatwick Airport and is therefore fully compatible with any policy requirement to safeguard land for future national requirements.
- The site can be developed to be fully compliant with the land use requirements for PSZs, as described in the DfT's Circular 'Control of Development in Airport Public Safety Zones' published in March 2010. This applies to the types of buildings and infrastructure proposed and the intensity of people within the individual third-party risk contours.
- Gatwick Green can be designed to be fully compliant with all other aspects of Aerodrome Safeguarding that need to be considered to protect flight safety from the airport, i.e. in relation to heights of all buildings, bird strike hazard, cranes, lasers, glare and confusing patterns of lights. These will be considered and continue to be addressed as the scheme is developed through its design lifecycle.
- Gatwick Green is compatible with the Airport's short-term expansion plans for the use of the standby runway under GAL's proposed DCO application.

Project:	Gatwick Green		
Our reference:	202103-GG-01	Your reference:	N/A
Prepared by:	J. Fitzgerald	Date:	29 June 2021
Approved by:	N. Mayer	Checked by:	M. Plunkett
Subject:	Gatwick Green Safeguarding	Revision:	E

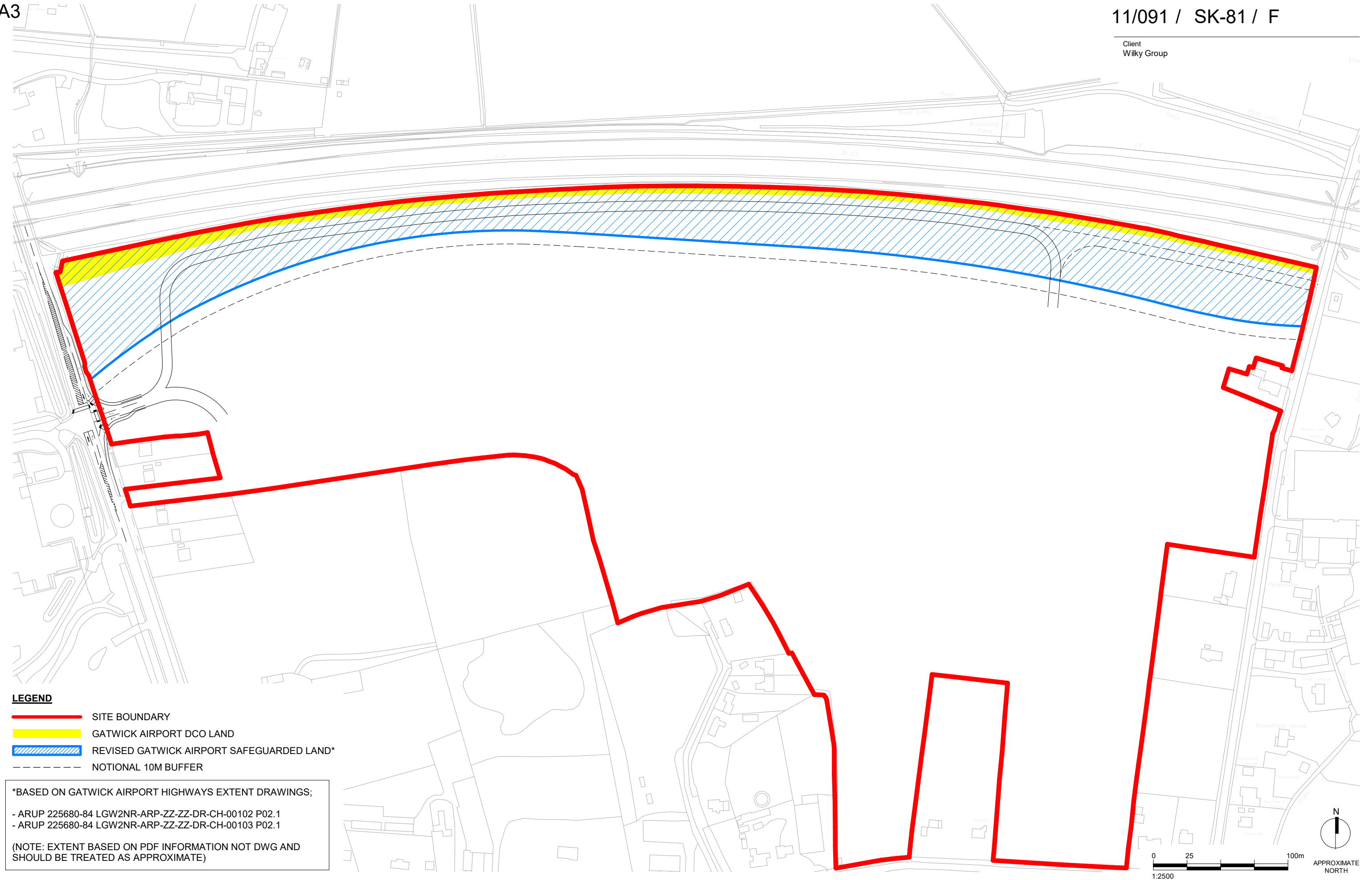
Appendix 5

Safeguarded Land south of the M23 spur road and a conceptual highway alignment for the access to Gatwick Green



GatwickGreen

WHERE THE FUTURE WORKS



LEGEND

- SITE BOUNDARY
- GATWICK AIRPORT DCO LAND
- REVISED GATWICK AIRPORT SAFEGUARDED LAND*
- - - - - NOTIONAL 10M BUFFER

*BASED ON GATWICK AIRPORT HIGHWAYS EXTENT DRAWINGS;
 - ARUP 225680-84 LGW2NR-ARP-ZZ-ZZ-DR-CH-00102 P02.1
 - ARUP 225680-84 LGW2NR-ARP-ZZ-ZZ-DR-CH-00103 P02.1
 (NOTE: EXTENT BASED ON PDF INFORMATION NOT DWG AND SHOULD BE TREATED AS APPROXIMATE)

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Job N Drg N 11/091 / SK-81	Rev F	Scale 1 : 2500	Status WORK IN PROGRESS	Job GATWICK GREEN
Date 21/01/2021	Director JA	Author AH	Check --	Drawing GAL Highways Extent - Overlay 1

NOTE: All figures are approximate and have been measured and expressed in a manner as defined by the current edition of the RICS Code of Measuring Practice, unless otherwise stated. Figures relate to the current stage of the project and any development decisions to be made on the basis of this information should include due allowance for the increases and decreases inherent in the design and building processes. Reproduced from Ordnance Survey mapping under Licence Numbers 100022432 & 100018493

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Appendix 6

Matters for Discussion relating to Access Between
Gatwick Airport Ltd and the Wilky Group



GatwickGreen

WHERE THE FUTURE WORKS

Matters for Discussion Relating to Access

Between Gatwick Airport Ltd and The Wilky Group

The following summarises those matters associated with the proposed development at Gatwick Green, on which Gatwick Airport, (GAL) and The Wilky Group, have discussed technical feasibility in relation to surface access. It is recognised that this represents discussions on points of technical detail only and this note is therefore a report on their current position. Most of the issues relate to safeguarding for the delivery of the wide-spaced second runway to the south of Gatwick (herein referred to as R2) for which a Masterplan has been published.

These discussions have not considered, nor do they relate to the determination of the Gatwick Green allocation for development within the Crawley Local Plan. Instead, the discussions consider some detailed aspects of the Gatwick Green Allocation that would benefit from review in the event that the principle of the allocation was to be taken forward, in order to minimise the incompatibility between any allocation and the R2 Masterplan.

Relevant matters

The following matters have been discussed between the parties.

1. The diversion of Balcombe Road in an East/West alignment across the northern sector of the Gatwick Green site south of the M23 Spur
2. The alignment of the proposed southbound off-slips from the M23 along with the northbound on-slips which have been designed to serve the new R2 terminal. These are shown on the plans received from GAL, to cross the northern sector of the GG site.
3. The proposed access arrangements into GG from the re-aligned A23 road to the west of the GG site, currently shown as a link, off a new roundabout just south of Fernhill Road.
4. The need to ensure access to zones, (retained in the areas surrounding GG) for the provision of airport parking, including where those access routes may impact on the Gatwick Green site.
5. Access to Gatwick rail station via Buckingham Gate, (on Balcombe Road) for buses, pedestrians and cyclists

The items for consideration focus on the issues which may be agreed in principle, (largely relating to matters of detail), should the allocation be confirmed as “sound” following the EIP and the Inspectors Report.

Progress towards in principle understanding and agreement.

Some progress has been made towards identifying the technical principles relating to access to Gatwick Green and the relationship with infrastructure associated with the R2 Masterplan. Whilst no agreement has been reached on any matter at this time, (June 2021), the parties will continue discussions. These will endeavour to support a formal statement of common ground once the representations have been submitted and in the lead up to the Local Plan Examination. This would be without prejudice to GAL’s position on the acceptability in principle of the proposed allocation on the Crawley Local Plan of Gatwick Green.

Appendix 7

Proposed Amendments to the Local Plan Map
Red Line Plan (Wilky Control)








GatwickGreen

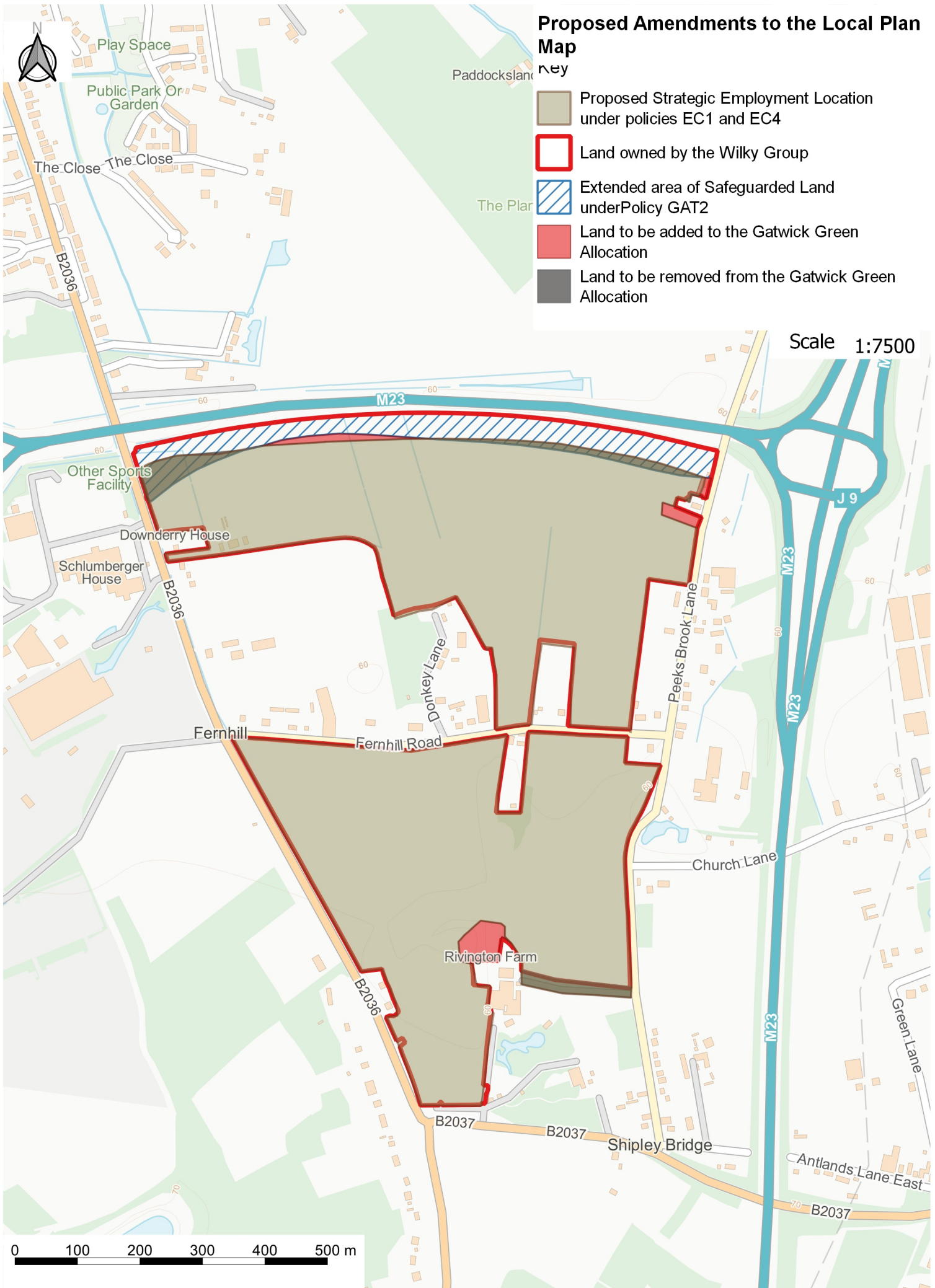
WHERE THE FUTURE WORKS

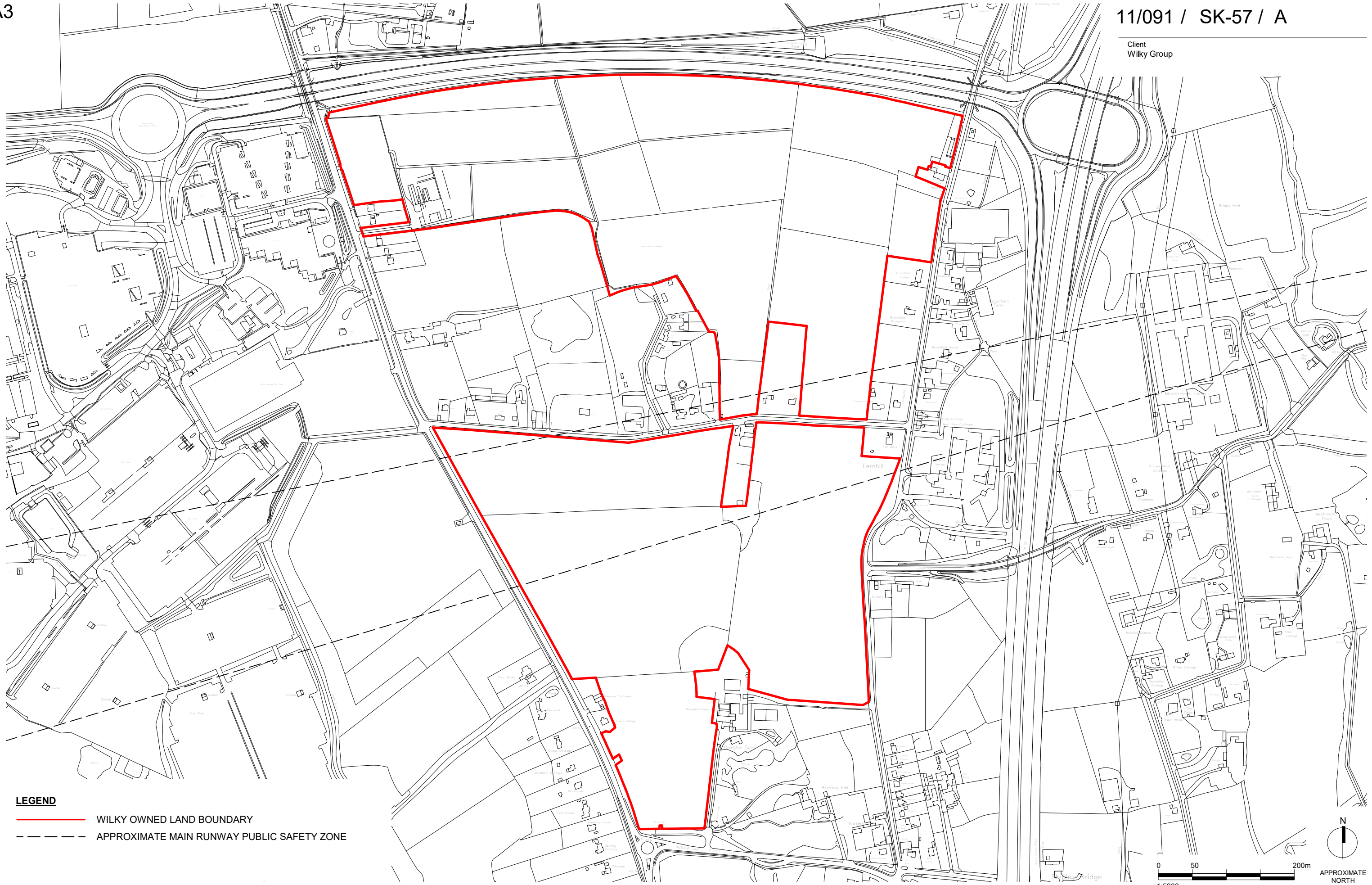
Proposed Amendments to the Local Plan Map

Key

-  Proposed Strategic Employment Location under policies EC1 and EC4
-  Land owned by the Wilky Group
-  Extended area of Safeguarded Land under Policy GAT2
-  Land to be added to the Gatwick Green Allocation
-  Land to be removed from the Gatwick Green Allocation

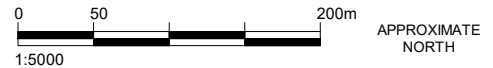
Scale 1:7500





LEGEND

- WILKY OWNED LAND BOUNDARY
- - - - - APPROXIMATE MAIN RUNWAY PUBLIC SAFETY ZONE



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Job N Drg N	Rev	Scale	Status
11/091 / SK-57	A	1 : 5000	PRELIMINARY
Date	Director	Author	Check
25/02/2020	JA	AH	JA

Job
GATWICK GREEN

Drawing
Red Line Plan (Wilky Control)

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Appendix 8

Proposed changes to Policy GAT2



GatwickGreen

WHERE THE FUTURE WORKS

Proposed changes to the Draft Crawley Borough Local Plan 2021-2037 (January 2021)

Savills on behalf of the Wilky Group

Changes to policy / text

Proposed changes to the policies and text of the DCBLP are set out below and are indicated by the following means:

Additions: underlined

Deletions: crossed out

Policy GAT2: Safeguarding Land

“Safeguarding for a second runway

The Local Plan Map identifies land that is safeguarded from development which would be incompatible with expansion of the airport to accommodate the construction of an additional wide-spaced runway (if required by national policy) together with a commensurate increase in facilities that contribute to the safe and efficient operation of the expanded airport. Small scale development within this area, such as residential extensions, will normally be acceptable. In addition, access/highway infrastructure associated with the Gatwick Green allocation will be acceptable within the Safeguarded Land between the allocation and the M23 spur road, and can be provided in a way that is compatible with the expansion of the airport to accommodate highway infrastructure associated with the construction of an additional wide-spaced runway. The airport operator will be consulted on all planning applications within the safeguarded area. Planning applications for noise sensitive development will be considered on the basis of Air Noise Map – Additional Runway – Summer Day – 2040 as shown at Plan 31 of the Gatwick Airport Master Plan and in the Local Plan Noise Annex.”

Reasoned Justification

....

“10.21 The Gatwick Airport Master Plan requests that local planning authorities use the revised safeguarding boundary shown in the Master Plan. The council has considered the Airport Layout: Additional Runway shown in Plan 20 of the Master Plan and has included within the Local Plan safeguarded boundary the land that would be required to accommodate a southern runway, including the diversion of the A23. However, the Local Plan safeguarded boundary has not included all the land east of the Balcombe Road which is shown in the Master Plan as being utilised for a large area of surface car parking. Given the constrained land supply within the borough and its significant employment and housing needs, the council does not consider surface parking to represent an efficient use of land. The Airport is already accommodating parking more efficiently through decked and robotic parking, and its Surface Access Strategy seeks to reduce access to the airport by car. This area excluded from safeguarding is essential to meet Crawley’s employment floorspace needs and is allocated in Policy EC1 as a Strategic Employment Location. Access to the Strategic Employment Location from Balcombe Road and a road to serve the Gatwick Green allocation can be accommodated in the Safeguarded Land between the allocation and the M23 spur road, in a manner that is compatible with the future provision of highway infrastructure associated with an additional wide-spaced runway: Policy GAT2 provides for this arrangement.”