

3RD NOVEMBER 2023

Charlotte Clancy
C/O Banks Solutions
80 Lavinia Way
East Preston
West Sussex
BN16 1DD

Sent by email to bankssolutionsuk@gmail.com

Dear Charlotte,

Crawley Local Plan 2024-2040 Examination - Inspectors' Matters, Issues and Questions (MIQs) Response by Gatwick Airport Limited (GAL)

Please find attached our responses to the Inspectors' MIQs in respect of:

- Matter 1: Legal Compliance and General Plan-making
- Matter 2: Spatial Strategy
- Matter 4: Economic Growth
- Matter 5: Gatwick Airport (except Questions 5.11, 5.12 & 5.13)

For clarity, we have responded to questions under each matter in tabular form setting our reply against the relative question raised.

We will submit further responses in respect of Matters 5 (Questions 5.11, 5.12 & 5.13), 9 and 10 before the 15 December 2023 deadline.

There are some common themes running through our responses which we thought the Inspectors might find helpful to have set down in a single place:

- i. Crawley Borough Council (CBC) has failed to fully acknowledge, and properly plan for the fact that since 2019, GAL has been preparing and has now submitted and has had an application for a Development Consent Order (DCO) accepted by PINS for examination, to grow the airport (known as the Gatwick Northern Runway Project) (NRP). GAL do not believe that the Local Plan Review needs to be paused until the outcome of the DCO is known provided that the Local Plan includes a policy that confirms what action(s) CBC will take once a decision on the DCO application is received in terms of future spatial planning. GAL considers that CBC needs to commit to a review of the Local Plan once the decision on the DCO is known.
- ii. The DCO application for the Gatwick NRP included a description of the 'baseline' position for the growth of Gatwick Airport as a one runway operation (i.e. the Policy GAT1 position). This chapter is submitted herewith as **Appendix 1** to set this position before this examination.



LONDON GATWICK



- iii. The principle of safeguarding land at Gatwick Airport for a wide spaced runway and associated facilities for future expansion to meet future travel requirements, remains national aviation policy. We attach as **Appendix 2** hereto a summary of the relevant policy, guidance and documents governing safeguarding of land generally at airports but specifically at Gatwick Airport. The principle of safeguarding land at Gatwick Airport was accepted by CBC in its adopted 2015 Local Plan (and in previous versions of their Local Plan) and in the submission draft plan, except in the latter case with respect to the proposed Strategic Employment Location at Gatwick Green and the Western Multi-Modal Transport Link (both interim and final proposals). CBC has taken a selective approach to safeguarded land at Gatwick without the provision of any technical analysis or evidence to support its stance and without any proper engagement with Gatwick Airport Limited (GAL). Use of safeguarded land for development is not justified and therefore the Plan is not legally sound.
- iv. The extent of land to be safeguarded at Gatwick Airport is set out in the Gatwick Airport Masterplan published in July 2019 (see Plan 21) (Doc. EGSM/GA/06). This masterplan makes clear that whilst at present the NRP scheme is being pursued, the proposal for a new full length additional runway to the south of the existing main runway has not been abandoned and could come forward during the draft local plan period 2024 to 2040. The document provided at Appendix 2 sets out, with reference to the 2003 Air Transport White Paper and the 2013 Aviation Policy Framework, how it is the role of airport masterplans to define the extent of land that needs to be safeguarded – not the Local Plan process.

The original 2005 safeguarded land is identified hatched in orange in Plan 21 of the 2019 Gatwick Airport Masterplan. The extent of the 2014 adjusted safeguarded land (outlined in blue) identified in Plan 21 was defined based on more detailed design work undertaken for the Airports Commission process (during 2013 – 2015), with the Masterplan itself being subject to public consultation in late 2018. This design work resulted in some boundary changes (the 2014 adjusted boundary) to the area previously safeguarded for an additional runway to the south of the airport (which is recognised in Policy GAT2 and shown on the Policies Map of the adopted CBC Local Plan 2015 and based on the original requirement to safeguard land contained in the 2003 Air Transport White Paper). The additional land is required to accommodate the geometric design of necessary highway improvements; the need to safeguard land to allow for the diversion of the River Mole and to reflect the operation needs of the airport (landing instruments and aerodrome requirements). A plan comparing the boundary of the 2005 original safeguarded land (following the publication of the 2003 Air Transport White Paper and as identified in the 2015 adopted Local Plan) and the 2014 adjusted safeguarded land arising from the Airport Commission work (as identified outlined in blue in Plan 21 of the 2019 Gatwick Airport Masterplan) is submitted at **Appendix 3**.

GAL consider the adjusted extent of safeguarded land has been carefully, robustly and conservatively assessed to protect the minimum amount of land required to deliver the core infrastructure for a new runway. The masterplan design proposal was recognised by the Airport Commission as being *“a credible option for expansion, capable of delivering valuable enhancements*



LONDON GATWICK



to the UK's aviation capacity and connectivity"¹. Since then, and as part of the work of the Airports Commission process – and as highlighted in the 2019 Gatwick Airport Masterplan (see paragraph 5.4.12) – the boundary was adjusted to meet the latest operational requirements. Paragraph 5.4.12 of the 2019 Gatwick Airport Masterplan recommends that the area safeguarded for the additional runway by the Local Planning Authority is based on the boundary shown, outlined in blue, on Plan 21 and as shown on the plan provided in Appendix 3.

- v. The definition of the airport boundary on the submitted Policies Map fails to reflect the airport boundary shown in Plan 4 of the 2019 Gatwick Airport Masterplan and that used in the May 2022 Section 106 agreement between GAL, Crawley Borough Council and West Sussex County Council to support the growth of the airport whilst minimising, so far as possible, its short and longer-term environmental impacts; and maintaining and enhancing the ways in which the parties to the agreement share information and work together and with other stakeholders to bring significant benefits to the airport and the communities it serves and affects. Plans showing the airport boundary in the 2019 Gatwick Airport Masterplan and on the submitted Policies Map are submitted at **Appendix 4** for ease of comparison.
- vi. Whilst an airport masterplan does not have development plan status, the level of detail contained within it is essential and a material consideration to inform the content of Local Plans coming forward (see policy extracts from the 2003 Air Transport White Paper and the 2013 Aviation Policy Framework in the document provided as **Appendix 2**). The Government expects airport masterplans to be taken into account in the preparation of regional and local policies and in the making of planning decisions and engaging with stakeholders. CBC has been selective about which elements it has taken into account from the 2019 Gatwick Airport Masterplan and makes its own, uninformed, misguided assumptions regarding the operations of the airport, the way in which the proposals for the additional runway to the south were developed and how this infrastructure would operate if implemented and the extent of land that needs to be safeguarded for any new runway. It has failed to understand that the relationships between each part of the masterplan are interdependent on one another. The Local Plan has consequently not been prepared on the basis of fully recognising the 2019 Gatwick Airport Masterplan.
- vii. CBC's assumption underlying the proposed strategic employment allocation at Gatwick Green is flawed. Not only is the site located wholly within the land safeguarded at Gatwick Airport for a new runway (which is contrary to national policy and therefore unsound), but the land is required to deliver the new runway project notwithstanding that it will not actually accommodate part of the proposed new runway itself. The 2019 Gatwick Airport Masterplan is proposed to function as a single ecosystem of development that is interdependent on the supporting infrastructure. There is no hierarchy of more/less desirable land within the safeguarded land as it is all required as shown on Plan 21 in the 2019 Gatwick Airport Masterplan.

¹ Executive Summary, Page 9 – Airports Commission : Final Report (July 2015) - <https://assets.publishing.service.gov.uk/media/5a808ab4e5274a2e8ab50bd4/airports-commission-final-report.pdf>



LONDON GATWICK



There has been no proper engagement with GAL to explore the implications of removing the site of the proposed strategic employment allocation at Gatwick Green from the safeguarded area; either before the employment land strategy was devised or following the submission of objections to it by GAL. GAL first became aware of the proposal when the submission draft plan was issued for consultation in January 2021, along with everybody else.

The Gatwick Green allocation is identified on land earmarked for surface level car parking on the airport layout showing the additional runway (Plan 20 in the 2019 Gatwick Airport Masterplan). The suggestion that land could be freed-up in the Gatwick Green area by providing decked-level car parking instead is not a correct assumption. GAL submitted technical analysis in 2021 to demonstrate this. This analysis is resubmitted herewith at **Appendix 5**.

- viii. GAL has several transport related concerns regarding the Plan, notably the transport modelling and the potential alignment of the Crawley Western Link (area of search) within the area safeguarded at Gatwick Airport for a new runway. The Council's own study has identified solutions that avoid encroachment on the safeguarded area, and the soundness of the Gatwick Green proposal in relation to safeguarding, traffic impact and access. GAL submitted a technical comment on transport modelling in 2021 which is resubmitted herewith at **Appendix 6**.

We believe you will find our response to the Inspector's Questions to be self-explanatory but please contact me if you have any questions.

Yours sincerely,



LYDIA GRAINGER
Planning Manager
Gatwick Airport Ltd

Enc.

1. Gatwick Northern Runway Project DCO – Chapter 4 of the Environmental Statement (Existing Site and Operation)
2. Safeguarding Land at Gatwick Airport for a New Runway and Preparation of Airport Masterplans – An Overview of Relevant Policy, Guidance and Documents
3. Gatwick Airport Safeguarded Land Boundary Comparison
4. Comparison between the Proposals Map and the 2019 Gatwick Airport Masterplan of the Gatwick Airport Boundary
5. 2021 Technical Note - Review of Gatwick Green and Impact on Gatwick Airport Runway 2
6. 2021 Technical Note - Review of Gatwick Green Transport Modelling