

Crawley

Local Plan

Crawley Borough Local Plan Examination

Crawley Borough Council Response to Inspectors' Matters, Issues and Questions

Matter 5: Gatwick Airport

November 2023



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Issue 1: Whether the overall approach to Gatwick Airport is justified, effective and positively prepared.

- 5.1 Question 5.1: Is the airport boundary, as a planning policy designation for the purposes of implementing Policies EC1, EC2 and EC7 and Policies GAT1-4, soundly based?
- 5.1.1 Crawley Borough Council (CBC) considers the airport boundary is soundly based and justified to ensure the appropriate control of airport related development. Section 3.1 of Topic Paper 2: Gatwick Airport, July 2023 (Submission Document Reference: DS/TP/02) explains that the Airport Boundary set out in the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) is a planning policy boundary used to define where airport related uses should be located and where the Gatwick Airport Local Plan policies apply. It is not intended to define operational land nor land ownership and it therefore differs in some areas from the boundary shown by Gatwick Airport Ltd in its Master Plan, Plan 4 (Gatwick Airport Master Plan 2019 (Submission Document Reference: EGSM/GA/06). A location on or off airport has significant implications for land use and CBC has carefully assessed the appropriate boundary to ensure the approach is justified.
- 5.1.2 The Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) Report, page 249, May 2023 (Submission Document Reference: KD/SA/01) assessed the option of using the Gatwick Master Plan boundary and determined that it was not appropriate to do so because it would provide a more lenient policy position for uses which support the growth of the airport, including for airport related parking which would not otherwise be supported in these locations. The SA/SEA concluded this would have a negative impact on the natural environment and potentially other indicators such as sustainable journeys and, therefore, climate change.
- 5.1.3 The boundary also now excludes buildings which are not in airport-related use, for example the Schlumberger House office building and the Brook House Immigration Removal Centre which were included within the airport boundary in the adopted Crawley Borough Local Plan 2015 (Submission Document Reference: CBLP/02) but have not been used for purposes which are essential to the facilitate the safe and efficient operation of the airport. These buildings are also excluded from the Airport boundary set out in the Gatwick Airport Master Plan.
- 5.2 Question 5.2: Is Policy GAT1 sound in terms of dealing with growth of the Airport in the context of a single runway and its approach to securing sustainable growth of aviation including avoiding / minimising adverse impacts and securing appropriate mitigation?
- 5.2.1 Crawley Borough Council (CBC) considers Policy GAT1 of the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) is sound, although it could be improved with the suggested modification set out in Question 5.9 below. Policy GAT1 refers to a single runway airport because this is the airport configuration which the airport-related policies in the Submission Local Plan are based upon. However, the policy itself refers to the Northern Runway Project Development Consent Order (DCO) application, in order to make it clear that the detailed criteria of the policy will be used by the council in responding to the DCO.

- 5.2.2 As set out Topic Paper 2: Gatwick Airport, July 2023, paragraphs 3.2.2 – 3.2.4 (Submission Document Reference: DS/TP/02) it is not considered imposing a cap on passengers or air traffic movements in the Local Plan would be effective, as the majority of the increase in capability at the airport is achieved by operational changes, and much of the development which is required falls within the scope of permitted development.
- 5.2.3 However, where planning permission is required or where consultations on permitted development proposals are received, Policy GAT1 is considered to provide a robust policy basis. The Reasoned Justification (Submission Local Plan paragraphs 10.13 and 10.15) provides further information on how it will be applied. The detailed wording of Policy GAT1 has been strengthened and made more specific in line with the greater emphasis in national aviation policy on minimising and mitigating the adverse impacts of aviation growth and sharing the benefits with local communities. Policy GAT1 has been amended in response to representations at each stage of consultation from Gatwick Airport Ltd (GAL) as well as environmental groups and others. It is considered that the Policy reflects the need to minimise and mitigate impacts, as well as to maximise benefits. The impacts from the airport affect both the environment and the health and living conditions of the local community and, as set out in the NPPF which specifically refers to the impact of pollution on health, living conditions and the natural environment (paragraph 185). Crawley Borough Council (CBC) considers it is important that these are all emphasised in Policy GAT1. A factual update to passenger throughput at the airport has been suggested as a modification to paragraph 10.11 of the Submission Local Plan (Submission Document Reference: CBLP/07) and a factual update on progress with the DCO has been proposed for paragraph 10.14.
- 5.2.4 CBC's detailed response regarding reference to compensation in Policy GAT1 is set out in responses to Questions 5.8 and 5.9 below.
- 5.3 [Question 5.3: Is the final paragraph of GAT1 a sound approach given the current situation of this plan examination occurring in parallel with a Development Consent Order \(DCO\) application for a major project envisaged in the 2019 Gatwick Airport Master Plan?](#)
- 5.3.1 The local plan policies of host authorities are important and relevant considerations in the consideration of a Development Consent Order (DCO) application. It was originally anticipated the Submission Local Plan would be examined well in advance of the DCO but the two processes are now more closely aligned because of delays to the Local Plan, particularly related to the requirements for water neutrality. Given the status of the Submission Local Plan, the adopted Local Plan (Submission Document Reference: CBLP/02) currently carries more weight than the Submission Local Plan and policies throughout the adopted Local Plan including those related to biodiversity, air quality, noise, visual impact and promoting sustainable travel are relevant and will inform Crawley Borough Council's (CBC) responses and Local Impact Report. However, the adopted Local Plan does not make any reference to Nationally Significant Infrastructure Projects (NSIPs).
- 5.3.2 There was awareness of the DCO from the early stages of the Local Plan preparation. Therefore, the final paragraph was included in Policy GAT1 from the Early

Engagement Local Plan Review stage onwards (Submission Document Reference: CBLP/06) in order to set out the approach CBC would take to any NSIP at the airport.

- 5.4 Question 5.4: Can Policy GAT1 be found sound in advance of the outcome of the DCO process and the implications, if the project receives consent, dealt with as part of any subsequent plan review?
- 5.4.1 Crawley Borough Council (CBC) considers Policy GAT1 of the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) can be found sound ahead of the outcome of the Development Consent Order (DCO) process and considers it important that there is an up-to-date policy in place. Policy GAT1 sets out criteria on which any applications at the airport will be considered, including those coming forward as part of a DCO. It is understood the DCO, if granted, will provide consent for all the Works included within the DCO but many of these simply set parameters at this stage within which detailed discharge of Requirement applications will then need to be considered by the planning authority (CBC in most cases) in the future.
- 5.4.2 Policy GAT1 does refer to a single runway airport, but the final paragraph makes clear that its detailed criteria apply to any Nationally Significant Infrastructure Project at the airport. Should the DCO be granted, the construction period will last for 14 years from the earliest start date in 2025, with the operational use of the Northern Runway with the existing main runway commencing in 2029. Passenger numbers and flights will increase gradually over time, as they would do on the main runway, only exceeding capacity limits on the main runway into the 2030s. The transport implications of growth on the main runway have been included in the Local Plan Transport Modelling Study (ES/ST/01a). The five yearly cycle for a Local Plan review will, therefore, be able to address the future implications of the DCO.
- 5.5 Question 5.5: Without prejudice to the Borough Council's position on the DCO project, has there been sufficient foresight during the preparation of this Plan in respect of the DCO project, for example transport modelling and in the SA, that appropriately considers any in-combination impacts? Is there any reason to delay adoption of the Local Plan pending the outcome of the DCO process?
- 5.5.1 Crawley Borough Council (CBC) considers there is no reason to delay the adoption of the Local Plan pending the outcome of the Northern Runway Project (NRP) Development Consent Order (DCO). The positive planning for the future development needs of Crawley borough is not especially reliant on proposals for the expansion of Gatwick Airport and, as long as due regard is given to the implications of expansion through proportionate evidence ensuring cumulative impacts are assessed within both processes, the Local Plan should be able to be progressed in advance of the DCO. Whilst the early plan preparation assumed the Local Plan would be adopted well in advance of the DCO outcome, delays particularly related to water neutrality have meant that the two processes have become more closely aligned. The NRP DCO was submitted in July 2023 and accepted in August 2023, and the full suite of documentation was not available to CBC until after acceptance. CBC and also Gatwick Airport Ltd (GAL) have been careful to ensure both processes take account of one another.

- 5.5.2 CBC's input into GAL's Cumulative Effects Assessment, most recently in May 2023 prior to the submission of the DCO, includes the adopted and emerging Local Plan allocations and these have been used in GAL's assessments. This includes the strategic employment site Gatwick Green, despite GAL maintaining an objection to the strategic employment allocation.
- 5.5.3 The main cumulative impact on Crawley as a result of the NRP and the Local Plan relates to surface access to the airport. The Northern Runway noise implications do not affect any proposed housing or noise sensitive use allocations within Crawley in the Submission Crawley Borough Local Plan (2024 – 2040), and Gatwick Airport is not within the Sussex North Water Resource Zone, so its expansion does not impact on the water neutrality requirements in relation to the protected Arun Valley habitats. The Airport's water supply is from SES Water to the north.
- 5.5.4 As explained more fully in Question 5.10 below, CBC has undertaken a Sensitivity Test for the Local Plan's Transport Modelling Study (Submission Document Reference: ES/ST/01w) to ensure there is sufficient foresight of the cumulative highway impacts of the Local Plan and the NRP. The Statements of Common Ground between CBC and West Sussex County Council, and CBC and National Highways confirm appropriate sensitivity tests have been undertaken and the Transport Modelling Study continues to represent an appropriate assessment of future transport conditions at the end of the Local Plan period in 2040.
- 5.5.5 The NRP proposals meet all the operational, directly related (including car parking) needs of the project, as well as providing on-airport locations for the required new airport-related offices and some of the hotels. There is ongoing discussion as part of the DCO process as to whether the planned housing development in the area can meet the labour demand for the expansion of the airport. GAL has taken account of planned housing trajectories, including the emerging Local Plan for Crawley borough and conclude in their Assessment of Population and Housing Effects, Appendix 17.9.3 to the Environmental Statement (Post-Submission Document Reference: PS/EGSM/GA/13) that their labour supply needs can be met from planned housing across the airport's extensive Travel to Work area which is far larger than Crawley borough. Even if it is later established through the DCO Examination that insufficient housing has been planned to meet the labour supply needs of the airport, the planned trajectories in the combined Plans are below the Standard Method Housing need figure and the need arising from the DCO would not increase housing need beyond the Standard Method figure. The Northern West Sussex Housing Needs Statement of Common Ground, July 2023, pages 9-10 (Submission Document Reference: SoCG/02) considers the impact of future growth at Gatwick Airport, and whether a different starting point for housing need should be considered. The councils agree that the evidence does not demonstrate that actual need with the DCO is higher than the Standard Method indicates. As the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) Policy H1 establishes a supply-led position for housing which maximises the amount of housing possible to meet within the borough boundaries and is unable to meet its existing housing needs in full, even if it was considered through the DCO Examination that additional housing is required to be planned due to the NRP this could not be accommodated within Crawley borough.

- 5.5.6 CBC is concerned about the need for affordable housing generated by the NRP, given the lower likelihood of staff in lower paid jobs travelling considerable distances to work at the airport. Again, this would not necessarily increase the overall need for affordable housing already identified in the Submission Local Plan because, as paragraph 13.20 of the Local Plan sets out, the Strategic Housing Market Assessment (Submission Document Reference: CBLP/H/HN/01) indicates a net need for 739 affordable homes per year in Crawley, of which 563 dwellings per year are needed as rented affordable housing. CBC's response to Question 3.2.4 and the Housing Needs Topic Paper (Submission Document Reference: DS/TP/03, paragraph 3.3.14) explain how the Local Plan responds to this need. CBC considers the NRP could increase the demand for affordable housing in Crawley and its neighbouring authorities beyond that which the Submission Local Plan can plan for given supply constraints. Through the DCO process, CBC is seeking further information on the impact on affordable housing within the borough to ensure this can be mitigated, if required. GAL has also produced an Employment, Business and Skills strategy specifically to help upskill the local population and ensure access to new jobs at Gatwick, working alongside other local provision. CBC is working with GAL to ensure the measures proposed are appropriately secured and delivered.
- 5.5.7 There is a need for additional off-airport employment space to support the NRP, but again, GAL argue this could be accommodated anywhere in the wider area. The Submission Local Plan already allocates the only strategic site CBC considers is available for employment if safeguarding is to remain. Should the DCO be approved and a subsequent national aviation policy decision made regarding future aviation requirements which result in safeguarding being removed, this would trigger a Local Plan review (see response to Question 5.21).
- 5.5.8 The Crawley Local Plan Habitats Regulations Report (Submission Document Reference: KD/HRA/01) reviewed the Gatwick Airport Northern Runway Project as part of the In Combination Screening Assessment, Appendix A, pA19. Notably, in paragraph 10.4.12, the HRA recognises that Gatwick Airport is served by South East Water (and is not, therefore, within the Sussex North Water Resource Zone).
- 5.5.9 The full suite of GAL's documentation supporting its DCO application was not available until after Acceptance of the application on 3 August 2023. CBC has engaged with the Topic Working Groups throughout the process and, with other host and neighbouring councils, sought to ensure the cumulative impact assessment included all planned development in Crawley and emerging proposals on its boundaries. Engagement included a Topic Working Group on 9 February 2023 where a summary of the DCO HRA was presented, advising that in combination assessments were undertaken for traffic-related emissions on some sites, including the Ashdown Forest, and concluded no adverse effect. No conclusions emerged from the DCO work which suggested the approach taken in the cumulative effects assessment for the Crawley Local Plan needed reviewing. The submitted Habitats Regulations Assessment for the DCO conclusions of appropriate assessment in combination conclude no adverse effect on integrity (Table 5.3.1, Gatwick Airport Northern Runway Project Environmental Statement, Appendix 9.9.1: Habitats Regulations Assessment Report – Part 1; Post-Submission Document Reference: PS/EGSM/GA/14).

- 5.5.10 The Crawley Local Plan Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA), May 2023 (Submission Document Reference: KD/SA/01) recognises the impacts of the growth of Gatwick Airport, highlighting (Non-Technical summary, paragraph 13) that the most significant negative effects of the Local Plan relate to the impact on countryside, increased infrastructure need and the effects of traffic, including those arising as a consequence of Gatwick Airport. The SA/SEA also particularly recognises noise implications arising from the airport, and also specifically includes a Sustainability Indicator (Table 4.3) for the “Number of passengers and staff using Gatwick Airport per annum and percentages arriving by public transport”, in support of the Objective 7 to reduce car journeys and promote sustainable transport. The SA/SEA identified the Issue that “The Growth of Gatwick Airport will put pressure on existing infrastructure and the environment”. Paragraph F20, page 176, concludes that the expansion of the airport on single runway, in combination with other development in Crawley is likely to place greater strain on infrastructure and acknowledges that the growth of the airport through the Northern Runway Project is separately being considered through the DCO process.
- 5.5.11 The SA/SEA testing of the Gatwick Airport Policies, page 248, sets out Option 1 for Policy GAT1 as its chosen option. This identifies the need for environmental and infrastructure mitigation to be in place alongside growth at the airport within a defined boundary to appropriately support its operation and growth within its current configuration. However, it does also highlight the issues CBC would expect to be addressed if GAL creates additional runway capacity at the Airport such as through the use of the northern runway which have been set out in Policy GAT 1 of the Submission Local Plan.
- 5.6 [Question 5.6: What are the infrastructure considerations should Gatwick Airport continue to expand using its current single runway model?](#)
- 5.6.1 The main infrastructure considerations of the continued growth of Gatwick using its current single runway relate to surface access. Alongside commitments to sustainable transport, parking requirements and impacts on highways are important considerations as the airport grows. Highway improvements including local widening and signalisation at the North and South Terminal roundabouts (not part of the DCO proposals) are programmed to be completed by 2029. New multi-storey car parks are also proposed on airport in line with the mode shift commitments in the s106 Agreement. As set in paragraph 3.4.7 of the Crawley Transport Modelling Study (Submission Document Reference: ES/ST/01a), the Study’s core forecasting methodology allowed for Gatwick Airport’s estimated growth up to 61mppa by 2032/33 in its current configuration as a single runway, two terminal airport.
- 5.6.2 The latest s106 Agreement (May 2022) between Crawley Borough Council (CBC), West Sussex County Council and the airport operator (Submission Document Reference: EGSM/GA/05) Obligation 5.6 commits GAL to providing sufficient but no more parking than necessary to achieve 48% of passengers using public transport to the airport modal share and 42% of staff using sustainable modes. The latest Airport Surface Access Strategy, October 2022 (Submission Document Reference: EGSM/GA/09) sets out targets on page 5 including 52% of passenger journeys to the airport by public transport by 2030 (compared to 47% in 2019) and 48% of staff journeys by sustainable modes (up from 39% in 2019). Obligation 5.3.2 in the latest

s106 Agreement also requires GAL to set aside funds, in the form of levy on the total supply of parking spaces, a small percentage of the fees from the forecourt charges and all of the fines from red route contraventions to be used for initiatives to promote sustainable modes of access to the airport by passengers and staff. This fund amounted to over £1.5million in 2023 and supports sustainable transport improvements, including in Crawley. A significant improvement project, partially funded by the Sustainable Transport Fund, is soon to be completed at Gatwick Station, almost doubling the size of the station concourse and improving access to the platforms.

- 5.6.3 Another key infrastructure impact arising from growth at the Airport is on wastewater. The private wastewater system at Gatwick Airport discharges to the Crawley Wastewater Treatment Works. As set out in the Crawley Infrastructure Plan, July 2023, page 13 (Submission Document Reference: KD/IP/01) if capacity issues are identified, upgrades may be possible within the existing site due to technological improvements and any necessary network improvements would be funded by the consumer, in this instance GAL. If an expansion to the Works is necessary as a result of Gatwick's growth, land is available within GAL's ownership immediately adjacent to the Works.
- 5.6.4 Gatwick Airport is outside the Sussex North Water Resource Zone so passenger growth does not affect the water supply impact on the protected Arun Valley habitats. The Airport's water supply is from SES Water to the north.
- 5.6.5 Significant physical changes are not required to accommodate growth on the main runway and, therefore, no major new drainage infrastructure is required.
- 5.7 [Question 5.7: Is the approach in criterion ii\) of Policy GAT1 an effective mechanism to assess proposals within the airport boundary? Does it allow for a balancing exercise that would take into account any positive benefits?](#)
- 5.7.1 As set out in Topic Paper 2: Gatwick Airport, section 2.2 (Submission Document Reference: DS/TP/02) national aviation policy recognises the positive benefits of airport growth but also emphasises the adverse environmental impacts of airport growth which affect local communities and emphasises the need for them to be mitigated as far as possible. This reduction and mitigation of adverse impacts is the purpose of criterion ii) of Policy GAT1 in the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01).
- 5.7.2 The potential for positive benefits from airport growth is recognised, and national policy, such as Beyond the Horizon, Making Best Use of Existing Runway (Submission Document Reference: EGSM/GA/04) emphasises (para 1.29) positive local benefits and (para 1.22) that communities surrounding airports should share in the economic benefits of airport growth. The potential for positive local benefits is addressed in criterion v of Policy GAT5, "*Benefits to Crawley's local economy and community are maximised*". The balancing exercise which will be essential as part of determining applications for development of facilities at the airport would take account of all five of the criteria set out in Policy GAT1, therefore enabling positive benefits to be taken into account.

- 5.8 Question 5.8: What does compensation in part ii) of Policy GAT1 refer to in the context of planning and land use considerations?
- 5.8.1 The reference to compensation in Policy GAT1, criterion ii) of the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) refers to situations where adverse impacts cannot be avoided or mitigated, and some form of compensation is necessary. This may relate to financial schemes for property acquisition, for example, but could also be for planning considerations such as loss of trees which cannot be replaced on site, as referred to by Obligation 6.4 of the 2022 Legal Agreement between CBC, WSCC and the airport operator (Submission Document Reference: EGSM/GA/05): *“replace or otherwise compensate for any loss of trees as a consequence of the development”*.
- 5.8.2 Gatwick Airport Limited (GAL) has, since the signing of the 2001 legal agreement contributed towards a Gatwick Airport Community Trust and its administration. This fund was set up by GAL in recognition that not every environmental or other impact can be fully addressed. The funds are targeted at those areas where people are directly affected by operations at Gatwick Airport. The Trust’s Website states: *“The purpose of setting up the Trust was to ensure that, as the airport continued to grow, funds generated by the existence of the airport should be made available to a board of independent trustees and they should be directed back into the community that was affected by the airport and its continuing growth”*. Funds are linked to passenger numbers, and also from noise infringement fines. The Trust acts as an independent body able to allocate resources to projects that contribute to reducing or compensating for such adverse impacts. This form of community compensation, which should be proportionate to the growth of the airport, is also important, as recognised in Aviation 2050, paragraph 3.72 (Submission Document Reference EGSM/GA/03).
- 5.8.3 The response to Question 5.9 below sets out CBC’s position regarding the wording in Criterion iii) of Policy GAT1 regarding compensation specifically for biodiversity.
- 5.9 Question 5.9: Would it be necessary for plan soundness to amend part iii) of Policy GAT1 to replace ‘like for like’ compensation with ‘fair’ compensation in relation to biodiversity?
- 5.9.1 Crawley Borough Council (CBC) appreciate the advice from Natural England in its representation to the Further Publication Consultation, set out in Consultation Statement Appendix 8, page 476 (Submission Document Reference: KD/CS/01j) regarding the proposed amendment of “like for like compensation” in Policy GAT1 of the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01). It is accepted by CBC that substituting this wording for “fair compensation” would more accurately represent the compensation being sought, going beyond like for like in recognition of the seriousness of this stage in the mitigation hierarchy and the potential difficulties with compensatory habitat creation. This proposed amendment, as set out below, would be supported by the council as a Modification to the Crawley Borough Local Plan (Post-Submission Document Reference: CBC/CBLP/07b). This reflects the wording of paragraph 180 of the NPPF which does not refer to like for like compensation.
- 5.9.2 Suggested Modification: Strategic Policy GAT1: Amend criterion iii) second sentence:

iii. Where this is not possible, suitable safeguards are in place to ensure impacts can be adequately mitigated or, as a last resort, ~~like for like~~ fair compensation is secured.

- 5.10 Question 5.10: How has the transport assessment work for the Local Plan, including the sensitivity testing (documents at ES/ST/01w) dealt with Gatwick Airport in the context of Policy GAT1, particularly in terms of potential cumulative impacts? Has the additional sensitivity testing work involved the input of West Sussex County Council and National Highways? Is there any consensus or common ground that the plan as submitted remains sound in terms of transport impacts and infrastructure or are potential main modifications required?
- 5.10.1 The Crawley Transport Modelling Study, paragraph 3.4.7 (Submission Document Reference: ES/ST/01a) confirms that growth of Gatwick Airport to 61mppa by 2032/22, as a single runway, as set out in the Gatwick Airport Master Plan was included in the core forecasting methodology. As set out in Topic Paper 2: Gatwick Airport, paragraph 3.2.3 (Submission Document Reference: DS/TP/02) much of this growth in passengers is related to operational changes including peak spreading, increased hourly movements and greater passenger loading on aircraft. Cumulative developments at the airport mainly respond to these operational changes, rather than creating the additional capacity themselves, but the Transport Modelling has taken this passenger growth into account. That modelling is agreed with West Sussex County Council and National Highways, (Submission Document References: SoCG/16 and SoCG/15a)
- 5.10.2 In response to questions raised by West Sussex County Council and National Highways regarding the transport implication of the Northern Runway Project (NRP) Development Consent Order, Crawley Borough Council (CBC) has undertaken a Sensitivity Test for the Local Plan's Transport Modelling Study, Technical Note Task 2 (Document Reference: ES/ST/01w) to assess the cumulative highway impacts of the Local Plan and the NRP. The instructions for the Sensitivity testing were agreed with WSCC, and both WSCC and National Highways provided comments on the draft results which were taken into account in the final conclusions. The technical advice received from Stantec, CBC's transport consultant is that *"The majority of the [overcapacity] junctions are signal controlled junctions that would benefit from optimisation in practice"* (paragraph 7.2 in the Sensitivity Test) and WSCC has not challenged this. Optimisation of traffic signals timings is a relatively low cost intervention that does not generally require significant construction work or land outside the existing highway boundary so does not require design at the plan-making stage. Therefore, the junctions can be identified through Transport Assessments and any optimisation secured through legal agreements with the developer.
- 5.10.3 The Statement of Common Ground between CBC and West Sussex County Council lists the meeting which took place to discuss the sensitivity testing, and Areas of Agreement No.6, confirms that appropriate sensitivity tests have been undertaken and concludes that the Transport Modelling Study continues to represent an appropriate assessment of future transport conditions at the end of the Local Plan period in 2040. That would include the NRP. The Statement of Common Ground with National Highways sets out the engagement with regard to the sensitivity

testing and Area of Agreement 3 confirms that, following a review of the sensitivity testing by National Highways, the Transport Modelling Study is an appropriate basis for testing strategically the highway impacts of the draft Crawley Borough Local Plan.

- 5.10.4 CBC's input into GAL's Cumulative Effects Assessment, most recently in May 2023 prior to the submission of the DCO, includes the adopted and emerging Local Plan allocations and these have been used in GAL's assessments. This includes the strategic employment site Gatwick Green, despite GAL maintaining an objection to the strategic employment allocation.
- 5.14 Question 5.14: What is the role of the Gatwick Airport Supplementary Planning Document (SPD) and what will an update to the SPD do in terms of supporting the implementation of the submitted Local Plan policies?
- 5.14.1 The Development at Gatwick Airport Supplementary Planning Document (SPD) 2008 (Post-Submission Document Reference: PS/EGSM/GA/12) provides supporting information to inform Development Management decisions on applications within the airport. It has not been updated for some years due to ongoing work with the Airports Commission, the Gatwick Master Plan, and now the Northern Runway Project Development Consent Order (DCO) so it currently has extremely limited weight. However, some of the information within the SPD is now included in the text of the Submission Local Plan itself, such as the definition of uses which are appropriate within the airport boundary: operational, directly related and less directly related development in para 10.15 of the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01). The outcome of the DCO will likely determine whether an update to the SPD would be beneficial – this would reflect the new planning parameters at the airport should the DCO be granted. It would set out what development is secured by the DCO and provide a framework to guide the assessment of other developments, based on Submission Local Plan Policies, particularly GAT1, GAT3 and GAT4 but also others across the Plan.
- 5.15 Question 5.15: Gatwick Airport have raised various comments regarding the need to amend supporting text to Policy DD5 (Aerodrome Safeguarding) for factual / technical accuracy reasons. Is there agreement that the modifications presented in document CBLP07 would address the concerns and these are not necessarily main modifications needed for plan soundness?
- 5.15.1 The Crawley Borough Council Schedule of Suggested Modifications, July 2023 (Submission Document Reference: CBLP/07) includes proposed amendments to paragraphs 5.38, 5.39, 5.41, 5.42, 5.44 and 5.47 of the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) in accordance with the text which Gatwick Airport Ltd requested in its response to the Further Publication Consultation (Submission Document Reference: KD/CS/01j, page 77). GAL were contacted on receipt of these MIQs, requesting confirmation that these modifications would address their concerns and are factual matters not main modifications needed for plan soundness but no response has been received to date.

Issue 2: Whether the approach to safeguarded land at Policy GAT2 is soundly based.

- 5.16 Question 5.16: What did the initial testing of options for Gatwick safeguarding at Regulation 18 reveal in terms of the approach to be taken in the local plan? How have matters evolved through the successive rounds of Regulation 19?
- 5.16.1 As set out in the Crawley 2035: Draft Early Engagement Crawley Borough Local Plan Review (Submission Document Reference: CBLP/06) Crawley Borough Council (CBC) asked “*Should land south of Gatwick Airport continue to be safeguarded for a potential future wide-spaced additional runway or not. Why do you think this*” in its Regulation 18 consultation. Sub-questions asked whether, if land was to be safeguarded, the Gatwick Master Plan boundary should be used, or not, and whether the future noise impacts should be taken into account.
- 5.16.2 Varied comments and representations were received, set out in the Consultation Statement January 2021 Appendix 2, page 298 onwards, and summarised on page 28 (Submission Document Reference: KD/CS/01c). Gatwick Airport and some other respondents supported the retention of safeguarding to enable the airport to expand, particularly to support the local economy and create jobs, whereas others, including landowners and Thames Water, felt safeguarding should be removed so that the land could be better used to provide employment space and meet infrastructure needs and other uses. Several respondents argued that Gatwick Airport was no longer promoting a southern runway and/or there was no longer a needs case for it. Groups including the Sussex Wildlife Trust and CPRE were concerned about the potential removal of safeguarding on biodiversity assets. Others, including the Manor Royal BID, suggested that decision on safeguarding land should wait until the Aviation Strategy was adopted (then expected to be late 2019). Several delegates at the Developer Forum held as part of the Early Engagement Consultation were concerned that the removal of safeguarding was a national government decision and that the land may remain safeguarded for many years. Some argued that more positive use should be made of the land, perhaps with long-term temporary uses being permissible (summarised on page 633 of Submission Document Reference: KD/CS/01c).
- 5.16.3 The government confirmed its decision to prefer additional runway capacity at Heathrow Airport in the publication of the Airports National Policy Statement (ANPS) (Post-Submission Document Reference: PS/EGSM/GA/10). As a result of this decision, consideration of the responses referred to above and taking account of the impact of safeguarding 613ha of land on the ability of the borough to meet its development needs, due to land constraints and also the need to have regard to future noise contours for a southern runway, CBC’s Initial Regulation 19 Consultation document, Crawley 2035: Draft Crawley Borough Local Plan (Submission Document Reference: CBLP/05) proposed Strategic Policy SDC3: North Crawley Area Action Plan. This was to enable the principle of lifting safeguarding to be considered first, through the Local Plan, and then the growth needs of the airport to be considered alongside other development needs, particularly employment.
- 5.16.4 This approach of seeking to plan positively for the area was broadly supported by landowners, particularly those promoting employment sites, although some

considered the Local Plan should be allocating their sites. Consultation Statement, January 2021, Appendix 4, pages 14 - 70 (Submission Document Reference: KD/CS/01e). However, Gatwick Airport Ltd, (GAL) objected to the removal of safeguarding, and CBC were advised by PINS on an Advisory Visit that the Area Action Plan approach was not appropriate and that the removal of safeguarding could not be regarded as certain, summarised in paragraphs 3.4.2 – 3.4.4 of Topic Paper 2: Gatwick Airport (Submission Document Reference: DS/TP/02).

5.16.5 Therefore, CBC accepted that safeguarding would need to remain in order for the Plan to be consistent with national policy, and instead considered the purposes for which GAL required the land to be safeguarded. The Draft Crawley Borough Local Plan January 2021-2037 (Submission Document Reference: CBLP/04) reinserted Policy GAT2, Safeguarded Land, into the Local Plan, thus retaining the majority of the area whilst removing a part of the land safeguarded only for car parking in order to enable the employment needs of the borough to be met through a strategic employment allocation.

5.16.6 The Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) maintains the same policy position.

5.17 [Question 5.17: Is there the robust evidence, as required by NPPF paragraph 106, to support the extent of safeguarded land under Policy GAT2?](#)

5.17.1 National policy (NPPF paragraph 106) provides support for local plan safeguarding policies, where justified in appropriate cases. So far as relevant to airports, it 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..."

The justification for, and extent of, safeguarding is thus for the local planning authority (LPA) to determine in its development plan – with the examination testing the soundness of its conclusions.

5.17.2 A key role of airport masterplans is to set out sufficient information and drawings (para B4 Aviation Policy Framework (APF) Submission Document Reference: EGSM/GA/02) to "enable future development of the airport to be given due consideration in local planning processes" (paragraph 4.11) and thus to allow the LPA to reach the required judgments as to whether safeguarding is justified under NPPF paragraph 106c whilst minimizing "non-statutory blight" (B5 of the APF).

5.17.3 Safeguarding is therefore justified where: (1) it is in respect of "critical" land only; (2) where there is robust evidence mainly in the Masterplan that the land in question "could be critical" in developing the infrastructure; and (3) non-statutory blight must be minimised – in other words no more land than shown to be required should be safeguarded.

[Southern Runway](#)

5.17.4 CBC has accepted that safeguarding of the land for the southern runway, its terminals, associated development and road and river diversions is justified under the above approach: see Question 5.18 below. The only issue is the extent of the safeguarding on the eastern land shown on the 2019 Gatwick Airport Masterplan

(Document Reference: EGSM/GA/06, Plan 20) for car parking. That very significant land here should be safeguarded for car parking is not in dispute. The dispute is whether there is robust evidence that the full extent of the identified land is critical to the possible future delivery of the southern runway project at some point in the future.

- 5.17.5 Neither the 2014 work submitted by GAL to the Airports Commission nor 2019 Masterplan contain any calculations or justification for the scale of this car parking area. ARUP has sought to justify the scale in its June 2021 Note, included with GAL's representation to the Additional Publication Consultation (Submission Document Reference: KD/CS/01h page 312). This Note, which references the 2014 Submission, appears to be the extent of the evidence to support this large area of safeguarding and to thus prevent CBC being able to meet its employment need through this Plan.
- 5.17.6 The scale of the area shown on the Masterplan appears to have been based on all long stay car parking ("LSCP") for the airport (95,750 spaces) being located here at a density (according to ARUP June 2021) of 1 space per 14.5sq m of footprint – with that density said to demonstrate an efficient use of land for 95,750 spaces with some decking (of unspecified extent) and some block parking (of unspecified extent). York Aviation has prepared a technical note on this matter to support CBC, included as Appendix to this Matter: Appendix A and submitted as a new document: York Aviation Paper Safeguarded Land for Car Parking, November 2023 (Document Reference: PS/EGSM/GA/18).
- 5.17.7 The 95,750 is based on 95mppa (no other figure ever having been put forward as part of the Masterplan) and a mode share of 60%. It assumes: (1) just 8500 spaces in MSCP; (2) no off-airport parking; and (3) all existing car parking including any decked or multistorey parking under the Northern Runway Project ("NRP") in the north west area being relocated here. It is clearly wrong. There are more than 19000 off airport lawful parking spaces and no basis for assuming they will be removed. With a southern runway there would be far more than 8500 short stay MSCP spaces near the terminals. It is not explained why decked parking would be built elsewhere on the airport and then removed. No longer term mode share gains over and above those already aimed for by 2040 are addressed. The area sought is thus excessive even on ARUP's 1:14.5sqm assumption.

Efficient Use of Land

- 5.17.8 Further, it appears that the 1:14.5sqm assumption is not demonstrative of an efficient use of land:
- a. the estimates of space required per space for different parking models are backed by no evidence never mind robust evidence based on actual experience at Gatwick or elsewhere. When benchmarked against actual experience the space required per space for decking; MSCP; block parking on decking and block parking in MSCPs are much lower;
 - b. no MSCPs are proposed (compare the position at Manchester where long stay block parked MSCPs deliver 8000 spaces on just 3ha and 6000 on just 1.7ha) even though there is no bar to them on aerodrome safeguarding grounds at least beyond the A23;
 - c. there is no evidence that block parking is maximized or that block parking on decked car parks or MSCPs is being used;

- d. no mechanical parking solutions have been assumed, which would increase efficiency of land use.
- 5.17.9 It appears from the ARUP note that a key reason for the scale of land take is the extra cost of providing spaces in decking and MSCP form. There is no evidence that such provision is not viable or that avoiding those costs would be “critical” in developing the southern runway. It is not accepted that minimizing cost of car parking provision to GAL should determine the scale of safeguarding.
- 5.17.10 The total area of land could be used:
- a. for low efficiency car parking (as GAL propose) based on a wrong estimate of how much parking is required; or
 - b. for an appropriate quantum of car parking using efficient parking models and meeting employment land requirements for the next 20 years.
- That choice is relevant to the extent of the safeguarding.
- 5.18 [Question 5.18: The Gatwick Airport Masterplan 2019 states that the airport is no longer actively pursuing a scenario for plans for an additional southern runway, but a future possibility remains to build and operate one. Is a precautionary approach to safeguarding justified given the current lack of certainty on a potential future second wide-spaced runway?](#)
- 5.18.1 Crawley Borough Council (CBC) reluctantly concludes it is required, in order to remain consistent with national policy, to continue to safeguard land at Gatwick Airport for a potential future southern runway. It could be questioned as to whether there is robust evidence of need for a southern runway because the Airports National Policy Statement (Post-Submission Document Reference: PS/EGSM/GA/10) plans for the need to 2030 to be met at Heathrow, and because the Northern Runway Project currently subject to the Development Consent Order application would expand capacity at Gatwick up to at least 2047, up to the maximum air traffic movements of 386,000 per annum included for Gatwick in the DfT’s Jet Zero Modelling Framework Annex D (Post-Submission Document Reference: PS/EGSM/GA/15). However, the Local Plan is required to be consistent with national policy and as set out more fully in Topic Paper 2: Gatwick Airport, section 2.2 (Submission Document Reference: DS/TP/02) the government’s draft Aviation Strategy, Aviation 2050 (Submission Document Reference EGSM/GA/03) published in December 2018, after the Airports National Policy Statement, stated in paragraph 3.66 that it is prudent to continue with a safeguarding policy to maintain a supply of land for future national requirements. The draft Aviation Strategy also stated that the government is not at the point of making a decision on long term (beyond 2030) need and that it proposed to ask the National Infrastructure Commission to include airport capacity in future national infrastructure assessments to determine if there is a needs case for further runways beyond 2030. The second National Infrastructure Assessment Baseline report stated that the future demand for air travel, and the approach to expanding runway capacity in the South East is currently unclear. Therefore, the Second Assessment will not further consider airport capacity. The Second Assessment has now been published, 18 October 2023 and does not include any reference to airport capacity.

- 5.18.2 Whilst the Gatwick Airport Master Plan (Submission Document Reference: EGSM/GA/06) confirms GAL is no longer actively pursuing plans for a southern runway, it does not rule out bringing one forward in the future. The Master Plan confirms (section 5.1.2) that the scenarios it sets out for growth on the main runway, the northern runway and safeguarding for a southern runway are not exclusive choices and Gatwick could transition from one to another within the timeframe of the Master Plan. However, the document does not provide growth figures or, it appears, a combined plan to show the layout of a three-runway airport consistent with the Northern Runway Project application.
- 5.18.3 It is therefore considered that there is no certainty in national policy, nor in the Gatwick Airport Master Plan, that safeguarding is not required for a potential future southern runway. Despite the strict formulation in government policy (NPPF paragraph 106c) given the potential nationwide significance of the issue and the current uncertainty it is considered, exceptionally and in line with the views of the advisory inspector, that a precautionary approach is currently justified to allow for possible nationally significant policy decisions to be made as to future growth beyond that currently planned for and beyond Heathrow expansion. The position will be reconsidered in the next Local Plan based on progress on those decisions.
- 5.19 [Question 5.19: Is the 2019 Gatwick Airport Masterplan the core of the robust evidence that supports maintaining the safeguarded land designation, in the terms sought by NPPF paragraph 106?](#)
- 5.19.1 Yes. Whilst the requirement to safeguard stems from national policy, as set out in response to Question 5.18, it is the masterplan which is required to provide the information and drawings to enable future development of the airport to be given due consideration in the local plan process and thus to allow CBC to make the required judgments as to whether safeguarding is justified under NPPF paragraph 106c and the extent of any such safeguarding. It is thus the base for testing that issue and then justifying GAT2: see for example, Aviation Policy Framework 2013 para 4.11; Annex B 4 – 5 (Submission Document Reference: EGSM/GA/02).
- 5.19.2 The safeguarding boundary for a future southern runway, Plan 21, Gatwick Airport Master Plan (Submission Document Reference EGSM/GA/06) is based on Plan 20 of the Master Plan. It is recognised, as stated in the Master Plan paragraph 5.4.4 that these plans are based on work submitted by Gatwick Airport Limited (GAL) to the Airports Commission process in 2014. This considered operational needs on airports as well as supporting infrastructure, for example, the optimum route for a diverted A23, and a diversion route for the Crawters Brook and the River Mole. This work was more detailed than the work used to define the safeguarding boundary in the 2005 and 2012 Gatwick Master Plans and the adopted Crawley Borough Local Plan 2015. As set out in Question 5.26, CBC accepts the majority of the safeguarded boundary but, as detailed in Question 5.24, it questions the justification and appropriateness of the approach to car parking to the east of Balcombe Road.

- 5.20 Question 5.20: Do the Airports National Policy Statement (ANPS) and the 2020 Supreme Court decision in respect of Heathrow provide a level of evidence to indicate that safeguarding is no longer required for Gatwick?
- 5.20.1 The Airports National Policy Statement (ANPS) (Post-Submission Document Reference: PS/EGSM/GA/10) published in June 2018, confirms the decision of government in supporting the recommendation of the Airports Commission that Heathrow is the preferred location for airport expansion in the next ten years (to 2030). The Supreme Court decision in December 2020 (Post-Submission Document Reference: PS/EGSM/GA/11) confirmed that the ANPS is not affected by any unlawfulness and is valid. However, the government's draft Aviation Strategy, Aviation 2050 was published after the ANPS in December 2018 and stated it is prudent to continue with a safeguarding policy to maintain a supply of land for future national requirements, as set out more fully in Topic Paper 2: Gatwick Airport, section 2.2 (Submission Document Reference: DS/TP/02). The draft Aviation Strategy also stated that the government is not at the point of making a decision on long term (beyond 2030) need (i.e. beyond the need which the Heathrow Third Runway is planned to address) and that it proposed to ask the National Infrastructure Commission (NIC) to include airport capacity in future national infrastructure assessments. As explained in Question 5.18, the NIC has not yet assessed airport capacity. It is accepted that there is no positive evidence that the southern runway **will** be required or given policy support at any time in the future but the overall context shows that safeguarding is (reluctantly accepted to be) appropriate to allow space for longer term policy decisions to be made.
- 5.20.2 Therefore, Crawley Borough Council (CBC) does not consider the ANPS and the 2020 Supreme Court decision regarding Heathrow provide sufficient certainty to remove safeguarding for a potential future southern runway at Gatwick in its entirety and NPPF paragraph 106c is currently met because the safeguarding of the runway "could be" critical in developing required national infrastructure dependent on those policy decisions referred to above.
- 5.21 Question 5.21: Would plan review be the appropriate mechanism to consider the necessity for continued safeguarding? What would be the likely trigger in relation to Gatwick and safeguarded land to prompt a plan review? Is the outcome of the National Infrastructure Commission work on airport capacity the source that would potentially provide the necessary certainty?
- 5.21.1 Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01), paragraph 1.36, states that "*should changes in national policy allow for the removal of the safeguarding of all the land for Gatwick Airport expansion, the opportunities and constraints of this land will be considered comprehensively through a review of the Local Plan, rather than as piecemeal development*". The required trigger to prompt a plan review for the area affected by safeguarding would be the adoption of new national aviation policy determining whether there is a needs case for further runways beyond 2030, and perhaps also specifically clarifying whether or not land at Gatwick should continue to be safeguarded. The National Infrastructure Commission may make recommendations on this matter, but the trigger would be the adoption of government policy. The second National Infrastructure Assessment has now been published, 18 October

2023, and does not include any reference to airport capacity or any further reference to safeguarding here or more generally.

5.21.2 Should government policy determine that safeguarding for a future southern runway at Gatwick Airport is no longer required, Crawley Borough Council (CBC) would take a similar approach to the Area Action Plan approach set out in CBC's Initial Regulation 19 Consultation document, Crawley 2035: Draft Crawley Borough Local Plan (Submission Document Reference: CBLP/05) Strategic Policy SDC3: North Crawley Area Action Plan. Safeguarding does not affect all spatial and policy areas of the Plan so the whole Plan would not necessarily need to be reviewed, depending on the timing of any government policy decision. Allocations in the remainder of the Plan area would remain unchanged. It would only be allocations and opportunities within the safeguarded area which would be reviewed in the light of the potential opportunity for more of Crawley's development needs to be met. The most appropriate locations within the previously safeguarded area to meet housing, employment, infrastructure and other needs taking account of the noise contours for the main runway for noise sensitive uses would be assessed alongside any future growth needs of the airport (excluding a southern runway). This would be balanced against the need to protect heritage and environmental assets in the area, including ancient woodland, and take account of constraints such as flooding. The importance of maintaining a visual gap between the edge of Crawley and Gatwick Airport would also be considered.

5.22 Question 5.22: Does the submitted plan's approach of removing areas from safeguarded land and establishing areas of search for the Crawley Western Link within the safeguarded area render the principle of safeguarding ineffective? Does the Plan retain a practicable area of safeguarded land that would enable an additional wide-spaced runway to the south of Gatwick?

5.22.1 As set out in response to Question 24 below, Crawley Borough Council (CBC) considers that removing land only identified for surface parking from safeguarding would not render the principle of safeguarding ineffective as it would not prevent a southern runway coming forward in the future nor even prevent the delivery of sufficient associated parking on the safeguarded land – albeit that a more efficient use of land would be required.

5.22.2 The Crawley Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) Policy ST4 does not remove areas from safeguarding to establish the area of search for the Crawley Western Link. The two areas partially overlap, as set out in paragraph 17.27 of the Submission Local Plan. CBC engaged consultants, Systra, to undertake a study to refine the area of search for the Crawley Western Link Road – Northern Section (Submission Document Reference: ESS/ST/02a) in response to representations regarding safeguarding made on the Draft Crawley Borough Local Plan, January 2021-2027 set out in Appendix 6 (pages 599 and 602) of the Consultation Statement (Submission Document Reference: KD/CS/01h) particularly by West Sussex County Council (WSSCC) and Gatwick Airport Limited (GAL). The purpose of the Study was to minimise encroachment into the safeguarded land as far as technically and financially feasible and, where encroachment is unavoidable, to seek to reach agreement with the affected major stakeholders, including GAL. The

Study was not intended to define specific routes, and Policy ST4 of the Submission Local Plan only identifies an Area of Search and does not safeguard land to protect route options. In paragraph 17.28, it is acknowledged that considerable further work will be required in future by the appropriate body responsible for delivering the route, and paragraph 17.29 recognises that the Study indicates potential examples where the route could fall outside of the safeguarded land completely, should this be necessary. If the route ultimately chosen encroached unacceptably on the safeguarded land such that it could prejudice the southern runway, then a mechanism for it to be later moved in the event of the southern runway being delivered would be required. The route is not required to support any development proposed within the Crawley Submission Local Plan.

5.22.3 As a result of the Systra Study, WSCC (REP/032, 2023) withdrew their objection as set out on page 786 of the Consultation Statement Appendix 8 (Submission Document Reference: KD/CS/01j). GAL's representation, Consultation Statement Appendix 8, p829 onwards, maintained its objection, and appended its detailed response to the Study (REP/056, 2023). This response and engagement with GAL during the process maintained a clear objection to any area of search encroaching into safeguarding but with some acknowledgement that further design work would be required for both the highway and the airport infrastructure and therefore options in the middle section did not need to be sifted out at this stage. However, the interim options (ES3 and ES3a) for the eastern section were very strongly objected to by GAL, highlighting the significant challenges which would exist for the necessary diversion of the route to enable the southern runway to come forward. CBC considers the benefits of the interim options which would avoid impacting on commercial properties in County Oak in the period before any southern runway may in the future come forward. This may be beyond 2050 given the capacity now proposed through the Northern Runway Project (or never) and the advantages of an interim solution could potentially outweigh the additional cost of diverting the route in the future. Paragraph 17.30 of the Submission Local Plan recognises this concern, stating that the benefits of the interim options would need to be considered carefully, as the point of route feasibility assessment, against the costs of re-providing the route should a southern runway be progressed, and that agreement with GAL would form an essential part of this further work.

5.23 Question 5.23: Is the approach to safeguarded land east of Balcombe Road justified? If the principle of not safeguarding land shown for surface car parking in Gatwick Master Plan is acceptable for the Gatwick Green proposal in Policy EC4 is a more consistent approach required for plan soundness with regards to any residual safeguarded land east of Balcombe Road?

5.23.1 It is accepted that some safeguarding for car parking is appropriate east of Balcombe Road. The issue is the extent of the safeguarding required there. CBC is satisfied that the parking needs from an airport with the southern runway could be met in the totality of the proposed to be safeguarded land, or elsewhere on the airport (or even if necessary elsewhere). The response to Question 5.24 below sets out Crawley Borough Council's (CBC) reasoning for removing land east of Balcombe Road from safeguarding, identified for surface parking, in order to allocate a strategic employment site.

- 5.23.2 In relation to the residual safeguarded land east of Balcombe Road, as discussed in response to Question 4.22, the Gatwick Green allocation can come forward in a manner that can operate in a complementary manner to, and does not prejudice, the highways infrastructure necessary to support a southern runway. The boundary of the site has been drawn following scrutiny of the road alignment plans for the southern runway, including discussion between the site promoter and GAL. The boundary of the Gatwick Green site has been amended to ensure it allows for the surface access arrangements for GAL's southern runway proposals, including the re-alignment of the A23 and the re-routing of the Balcombe Rd. It also maintains some residual areas potentially available for future parking requirements.
- 5.24 Question 5.24: Is Gatwick Green justified in the context that the Gatwick Airport Master Plan 2019 envisages surface car parking in this location? If Gatwick Green is found sound, and having regard to the Airport Surface Access Strategy, the 2022 Section106 agreement, and the DCO proposals, would there be any significant adverse impacts for accessibility to Gatwick Airport?
- 5.24.1 The Gatwick Airport Master Plan 2019, Plan 20 (Submission Document Reference: EGSM/GA/06) is based on the work submitted to the Airports Commission in 2014, as stated in paragraph 5.4.4. Appendix A5 of this 2014 work, Operational Efficiency Master Plan (Post-Submission Document Reference: PS/EGSM/GA/16 envisages 95,750 surface car parking spaces (comprising 59,750 long-stay, 23,900 long-stay block parked and 12,100 staff spaces) in the wider area east of the railway within which the Gatwick Green allocation sits. Additionally, 8,500 short stay spaces are said to be provided close to the terminals giving a total of 104,250 spaces. This was to serve 95 million passengers per annum (mppa). CBC has not seen the justification of this number as part of an overall strategy for sustainable access, nor how it will help meet the target public transport mode share in the 2014 work for passengers of 60% (50% for staff).
- 5.24.2 The current Development Consent Order (DCO) proposal for the Northern Runway Project (NRP) includes Surface Access Commitments including 55% passenger journeys to and from the Airport to be made by public transport; and 55% of airport staff journeys to and from the Airport to be made by public transport, shared travel and active modes with an aspirational target of 60% for both. The NRP, having reduced the amount of new parking proposed considerably by over 10,000 spaces having taken account of responses to its Preliminary Environment Information Report consultation, is proposing 54,370 spaces (long and short stay, and staff) to serve 80.2mppa (paragraph 7 and section 2.3 of the Transport Assessment for the DCO (Post-Submission Document Reference: PS/EGSM/GA/17). The number of spaces for staff, per 1000 employees, is to decrease. There is clearly a marked difference in the number of spaces per passenger envisaged, over 1,000 spaces per million passengers in the 2014 plans, and just over 670 spaces per million passengers in the current DCO proposals. The DCO proposals make more efficient use of space, utilising multi-storey, block and decked car parking and proposing innovative new forms of parking to reduce land take through robotic parking. This reduction in the ratio of parking provision, and increased innovation in car parking provision is likely to continue with the emphasis on sustainable surface access.

- 5.24.3 In its Operational Efficiency Master Plan, the Eastern Campus Plan, Figure 4.6.6.1 shows the Gatwick Green site area (and land to the south and west) is identified for long stay parking. Section 3.7 of the document states that this area has been designed to accommodate a consolidated surface car parking zone but also allows for the possibility that 35Ha of this land may be used for commercial development for the relocation of businesses displaced by the southern runway, recognising that the choice of relocation would be a commercial decision by the businesses and states that “Should these be required there would be a need to deck some of the surface car parking to keep the developments within the extended airport boundary”. This suggests that the amount of land identified for parking was not fixed as a critical component of the Master Plan, that there was considerable scope for more efficient parking models and that other commercial uses could be accommodated in the area. Page 103 of the Operational Efficiency Master Plan describes the consolidation and centralising of the surface car parking zones east of the railway line, arguing that “Sharing of common facilities allows for a more optimum resource allocation and generates space efficient developments whilst simplifying the operational costs”. However, it does not consider whether other more space efficient forms of parking such as are now being proposed through the DCO would reduce the amount of land take the southern runway would require, nor whether other locations may still be available for parking.
- 5.24.4 It thus seems that: (1) GAL’s parking requirement per million passengers is far lower than assumed when the 2014 Masterplan identified the extent of the eastern land; and (2) there is ample scope for more efficient parking models in the eastern area (and elsewhere) to accommodate the required number of spaces on far less land.
- 5.24.5 The Gatwick Green site is earmarked for surface parking (with the potential for some commercial uses) in the Master Plan for the future southern runway. The ASAS 2022, the 2022 Legal Agreement and the DCO do not take any account of the delivery of a potential future southern runway. The Gatwick Green site promoter has sought to engage with GAL as part of the DCO process to ensure their development works around the necessary surface access improvements for the Northern Runway. Therefore, if the Gatwick Green allocation was found to be sound, there would be no significant adverse impact on accessibility for the current plans of the Airport. Also, it is considered that the surface parking requirements for the southern runway are out of date, significantly over provided for based on the numbers in the 2014 work, and do not reflect current and likely future trends in promoting more sustainable access to airports. Finally, the use of all of the land solely for car parking was not considered critical even in the 2014 work, with an option for 35ha of land to be taken out for commercial uses by having more efficient parking models.

- 5.25 Question 5.25: There are a number of sites being promoted for employment uses within safeguarded land or proposed to be removed from safeguarded land (helpfully provided on page 31 of Topic Paper No.5 – extract of Fig ii from the Crawley ELAA, 31 March 2023). Has the site selection process for employment land been robust and consistent and is it transparently set out in the supporting evidence to the Plan, including the SA?
- 5.25.1 The site selection process for employment land is set out in detail in Crawley Borough Council's (CBC) response to Question 4.31. The Sustainability Appraisal/Strategic Environmental Assessment, May 2023 (Submission Document Reference: KD/SA/01) assessed every site against the same consistent Sustainability Appraisal objectives and clearly sets out its assessment conclusions in Appendix H. The only allocated employment site, Gatwick Green, is identified for car parking (or possible future employment relocations) in the Gatwick Airport Masterplan (Document Reference: EGSM/GA/06) and that parking is amply capable of being delivered without it. That does not apply to the majority of the other sites in the area of the runway or the terminal and associated infrastructure and roads. Land at Fernlands, is located immediately to the west of the Gatwick Green allocation and also falls within an area of land identified in the 2019 Gatwick Master Plan for airport-related car parking. The site is not large enough to meet Crawley's employment needs in full, and is promoted either as an extension to, or an alternative configuration of, Gatwick Green. However, a single site promoter provides more certainty of delivery of a comprehensive strategic allocation. CBC is seeking to strike a balance between delivery of strategic employment land and the retention of safeguarding to enable a southern runway (with adequate car parking) if required at a future point and, given that Gatwick Green is capable of meeting Crawley's employment needs, it is not thought appropriate to remove further land from safeguarding.
- 5.26 Question 5.26: Is it justified that Gatwick Green is the only site³ capable of meeting the Borough's employment land needs without prejudicing the future delivery of a southern runway?
- 5.26.1 Crawley Borough Council (CBC) considers that Gatwick Green is the only site available to meet the Borough's employment needs on a comprehensive basis which is not critical for the delivery of a potential future southern runway. Appendix A5 of the work submitted to the Airports Commission in 2014, The Operational Efficiency Master Plan (Post-Submission Document Reference: PS/EGSM/GA/16) sets out operational requirements for the southern runway, including in section 4.7.3 detailed examples of why the land take to the south is needed for safety distances from the runway, the diversion of the A23 and the diversion of the waterways. Some aspects of these plans may change as detailed design work for a future runway is undertaken but the council considers the boundary for safeguarding suggested in the Master Plan 2019 to be appropriate in relation to these operational and location specific matters.
- 5.26.2 Gatwick Green is the only appropriate potential strategic employment site which falls outside this area, as it is only designated in the Master Plan for surface parking,

³ Paragraph 4.56, Topic Paper No. 5 Employment Needs and Land Supply – July 2023

with very limited detail provided in the 2014 work (as discussed in Question 5.24) compared to that in relation to the southern boundary. As set out in response to Question 5.25, Land at Fernlands, at 8ha, is not large enough to meet Crawley's employment needs, it is not required to meet current estimates of employment need and it is therefore not necessary to remove further land from safeguarding.

- 5.26.3 CBC's response to Question 4.31 sets out the alternative options to Gatwick Green which have been considered throughout the preparation of the Submission Local Plan. Numerous sites have been promoted to the council, and CBC acknowledges that other sites promoted for strategic employment provision, particularly those adjoining Manor Royal, may represent more sustainable locations. However, those sites cannot be delivered due to the ongoing requirement to safeguard land for a possible southern runway. Gatwick Green is considered to represent the only site that is of a sufficient scale to deliver the quantum of required storage & distribution floorspace in a comprehensive way, without prejudicing the potential delivery of a southern runway.
- 5.27 Question 5.27: Is the Plan effective at paragraph 10.19 in what is meant by 'small-scale' development that could be permissible within the safeguarded area in accordance with Policy GAT2? Should temporary uses/permissions be included?
- 5.27.1 Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) paragraph 10.19 seeks to provide some examples, not an exhaustive list, of what the policy means by small-scale development which could be permissible within the safeguarded area. Every application would be considered on its specific characteristics, so it is not considered appropriate to seek to define small-scale within the policy.
- 5.27.2 Crawley Borough Council (CBC) would support temporary uses/permissions within the safeguarded area as this would allow positive use of the land. The adopted Crawley 2030 Local Plan, 2015 (Submission Document Reference: CBLP/02) Policy GAT2 allowed for temporary uses, stating "Where appropriate, planning permission may be granted on a temporary basis". However, this wording lacked clarity and led to difficulties particularly with large scale but temporary uses. Therefore, reference to temporary uses was removed from the GAT2 Policy for the Crawley 2035: Draft Early Engagement Crawley Borough Local Plan Review, 2019 (Submission Document Reference: CBLP/06) with the reference to small scale development remaining. As set out on pages 325-326 of the Consultation Statement, January 2021, Appendix 2 (Submission Document Reference: KD/CS/01c) Gatwick Airport Limited (GAL) supported the exclusion of temporary uses from the GAT2 Policy Option 1 on the basis that the existence of temporary development could add materially to the complexity and challenges of bringing forward a southern runway. GAL continued to specifically support the exclusion of temporary uses in their response to the Additional Publication Consultation as set out in Consultation Statement, Appendix 6: Additional Publication Consultation Representations, page 424 (Submission Document Reference KD/CS/01h) suggesting its exclusion "close loopholes in the previous wording on temporary uses that some developers had sought to exploit".

- 5.27.3 GAL has now stated in its response to the Further Publication Consultation that it does not object to the approval of temporary uses which do not prejudice the future delivery of a second runway and suggests the reinsertion of the wording from the adopted Local Plan (Consultation Statement, Appendix 8: Further Publication Consultation Representations, page 546, Submission Document Reference: KD/CS/01j).
- 5.27.4 CBC supports temporary uses but considers it is important that criteria are set to control the type and scale of temporary uses which can come forward. Therefore, CBC requests that the Inspectors consider this as an additional suggested modification to the Plan. CBC has sought to agree this wording with GAL but no response has been received to date.

Proposed new wording: (in red) (Post-Submission Document Reference: CBC/CBLP/07b)

GAT 2: Add policy wording as in adopted Local Plan “*Where appropriate, planning permission may be granted on a temporary basis*”.

*10.19 For the purpose of policy interpretation small-scale development includes development such as residential extensions, updating or refurbishment of buildings, some changes of use, or other minor development. **Appropriate temporary uses may include those that are short term, with a defined end date and which don't involve significant construction.** Incompatible development within safeguarded land is regarded as development which would add constraints or increase the costs or complexity of the development or operation of an additional runway. The airport operator will be consulted on all applications within the safeguarded area for a second runway.”*

- 5.28 Question 5.28: Is it justified and effective that the area shown for safeguarded land overlaps with areas of land designated under Policy EC3 for Manor Royal (for example land north of Fleming Way)? Have alternative options for the boundaries of safeguarded land under Policy GAT2 been assessed?
- 5.28.1 As set out in the response to Question 5.26, Crawley Borough Council (CBC) has considered Gatwick Airport Limited's 2014 submission to the Airports Commission, which forms the basis of the 2019 Gatwick Master Plan Safeguarding boundary (Submission Document Reference: GSM/GA/06) for a southern runway.
- 5.28.2 Alternative options for the boundaries of safeguarding have been considered, as set out in the Sustainability Appraisal/Strategic Environmental Assessment, May 2023, page 250 (Submission Document Reference: KD/SA/01). This assessment concluded the area to the east of the airport, identified in the Master Plan as only being needed for surface parking, with limited evidence in the 2014 submission (see response to Question 5.24) has been taken out of safeguarding.
- 5.28.3 To the south of the airport, as well as the operational requirements of the airport itself, essential matters, such as the diversion of the A23 and the realignment of the rivers which are the reasons that safeguarding now impacts on the northern areas of Manor Royal, are considered critical to the delivery of the southern runway. As with Lowfield Heath, which is a main employment area which has been in the

safeguarded area since safeguarding was introduced, safeguarding will be a constraint on economic growth and the scope for re-use/intensification of sites but some changes, such as minor extensions and changes of use, can still be made to buildings within this area (see response to Question 4.14). Therefore, it is still justified for the area to fall within Policy EC3.

- 5.29 Question 5.29: The safeguarding area in the submitted plan extends further south into Manor Royal compared to the 2015 Local Plan. Is this justified and would it remove the flexibility at the fringes of Manor Royal intended in the 2015 Local Plan?
- 5.29.1 The revised safeguarded boundary, compared to the adopted 2015 Local Plan, does remove flexibility for extensions at the northern edge of Manor Royal, as acknowledged in Topic Paper 5, paragraph 4.78 (Submission Document Reference: DS/TP/05).
- 5.29.2 However, as set out in the response to Question 5.28 Crawley Borough Council accepts the southern boundary for Gatwick Airport Limited's proposed safeguarding in light of airport operational requirements, and the need to divert the A23 and the rivers.
- 5.30 Question 5.30: Is paragraph 10.18 of the Plan effective in specifying that it would be a review of national aviation policy that would be the trigger for reassessing the currently safeguarded area?
- 5.30.1 Paragraph 10.18 of the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) reflects paragraph 1.36 of the Plan as set out in Question 5.21. The required trigger to prompt a plan review for the area affected by safeguarding would be the adoption of new national aviation policy determining whether there is a needs case for further runways beyond 2030, and ideally also specifically clarifying whether or not land at Gatwick should continue to be safeguarded. The Local Plan has to be consistent with national policy and it is, therefore, considered that this paragraph is effective.

Appendix A: York Aviation Paper Safeguarded Land for Car Parking,
November 2023



Paper On Safeguarded Land For Car Parking – Gatwick Airport Wide Spaced Runway Scheme

1. This note has been produced for Crawley Borough Council (CBC) to provide advice on matters relating to Gatwick Airport Limited's (GAL's) objection to draft policies set out in the revised Draft Local Plan. In particular, these are policies that look to allocate as strategic employment land that was previously allocated as safeguarded as part of a possible future wide spaced runway scheme at the Airport.
2. We understand that landowners, Gatwick Green Limited (GGL) have submitted representations to promote a strategic employment opportunity on approximately 44 hectares (ha) of land to the east of the Airport, which would require the land being removed from the Safeguarded Land, as identified under draft Policy GAT2 of the draft Local Plan. As part of that representation GGL has commissioned Mott Macdonald to undertake an assessment of the objection put forward by GAL and, in particular, the supporting information provided by Ove Arup & Partners Limited (Arup) in June 2021.
3. In this note, we have reviewed points made by both Mott Macdonald and Arup particularly in relation to car parking requirements but have not confined ourselves to points already made. We consider whether the claimed car parking need has been assessed on a correct basis, what appropriate assumptions to make in respect of assessing the necessary landtake for car parking, what an efficient use of land here would be likely to look like and whether the concerns of ARUP on matters such as the viability of decking, multistorey and mechanised car parking are justified. We assume that provision of car parking meets the tests for safeguarding and that the eastern area would be the only appropriate location for such car parking (although we understand that the Council does not concede either such point) and simply seek to assess whether the quantum of the area identified for long stay car parking is necessary as part of a southern runway project.
4. Whilst York Aviation is not first and foremost a surface access consultancy. However, our experience and expertise in aviation means that we understand well the components of airport master planning, as well as the requirements relating to provision of passenger and staff car parking and routinely carry out benchmarking exercises for airport facilities including ancillary elements such as car parking.
5. Broadly, our understanding of the objection from GAL centres around the fact that land at Gatwick Green to the east of Balcombe Road has historically been safeguarded for a potential future master plan option with wide spaced runways achieved through the delivery of a new southern runway. This plan indicated land take to the south for the second runway and to the east for what we understand from Plan 20 of the Gatwick Airport Master Plan 2019, to be long stay surface car parking.
6. We do not comment on the policy test for safeguarding or the legal framework.

Masterplans

7. The information available to assess for the potential future proposals comes in the main from this Master Plan and the previous 2014 version. Master plans, particularly those that aim to plan for the very long term, are high-level in their detail and often seek to reserve land on an excessively generous basis. This appears to be the case for the plans put forward for the wide spaced runway option in both the 2014 and 2019 master plans where, in relation to car parking, the plans provide only an overview of the anticipated requirement, and the figures provided for numbers of spaces required are not backed up with any detail or the calculations underpinning the scale of the landtake. This point is highlighted by Mott Macdonald in relation to the suggested future requirement used by Arup and we agree with it.

Cautious approach to masterplanning not justified for car parking

8. With this in mind, when assessing long term master plan requirements, there is usually a significant degree of uncertainty due to a range of factors, not least the effect the long passage of time can have on actual future requirements. For this reason, master plans often look to safeguard far more than is required and, in several respects, this may be both prudent and necessary. However, we consider that there are several reasons why, for car parking, there can be a high degree of confidence that long-term future requirements are likely to be less than anticipated in 2014 – for reasons addressed below.

No Consistent Masterplan showing Northern Runway Project and Southern Runway Project

9. With regards to the wide spaced runway master plan, we would also highlight the fact that it is not entirely compatible with the Northern Runway Project (NRP) that looks to deliver additional capacity through the widening and extended operation of the current standby runway. The NPR plans to incorporate additional terminal infrastructure in the northeast of the site with a satellite pier linked by a passenger road transit system to the North Terminal. This scheme reduces the area of existing long stay parking in that area, however, replaces this capacity by proposing an estimated ten hectares of decked parking on the remaining land in that area.
10. In the wide spaced runway plan, this same area of the airport is used for cargo and maintenance with terminal expansion delivered in a new terminal between the runways. All car parking is consolidated in the area east of the railway in that scheme. Therefore, it is not clear how the wide spaced runway scheme would be developed should the NRP go ahead, although we assume that terminal and decked car parking infrastructure developed as part of NRP would not be replaced with alternative infrastructure as per the wide spaced runway scheme plans. This suggests that the starting point from which Arup assessed the space requirements for car parking to the east of the rail lines in a future wide spaced runway scenario does not assume the NRP and its associated decked parking is developed.

Failure to reflect increased parking infrastructure

11. As noted above, the Arup assessment only assesses the car parking requirement for the future wide spaced runway scheme as set out in the 2014 masterplan with no consideration of near term development, including the NRP that plans to develop decked parking on the existing North Terminal long stay over an area of approximately 10 ha. There is or is proposed very significant additional car parking infrastructure absent the southern runway. More MSCPs have been provided at the existing terminals (totalling 9400) and decking has been introduced on a significant area of the South Terminal's long stay car park (1455 spaces). More MSCPs are proposed as part of the NRP.
12. With the southern runway, further MSCPs at the new terminal are proposed.

13. The basis of Arup’s assessment was the assumed need to accommodate all their future car parking (other than just 8500 short stay in MSCPs) for a potential 95 mppa capacity airport on land east of the rail line. This appears to be a significant underestimate of short stay MSCP provision.

Failure to account for lawful established off airport parking

14. We further note that the figure used by Arup as the future requirement for spaces (not including short stay) is 95,750 which they state is taken from the 2014 master plan. In that document, the 2012 baseline figures provided, state that they include 26,280 off-site spaces within the long stay and staff parking figures resulting in an on-airport requirement of 61,300 spaces. Below, we have consolidated data provided across three separate tables¹ in the 2014 master plan Appendix A5 stating the baseline and future projections of parking space requirements up to 95 mppa. We have added totals and a spaces/mppa metric for further comparison.

Table 1.1: 2014 Master Plan Car Parking Spaces Requirements

	Year	MPPA	No of Staff	No of Parking Spaces				Spaces / mppa
				Short-stay	Long-stay	Staff	Total Spaces	
Existing	2012	35	21,000	5,000	**46,300	10,000	61,300	1,751
Option 0	2025	45	24,000	5,700	52,700	10,100	68,500	1,522
Option 3	2040	79	33,700	8,500	78,700	12,100	99,300	1,257
-	2050	95	-	8,500	83,650	12,100	104,250	1,097

*** Long term and staff spaces include off site provision of ~26,280 spaces*

15. It is clear from the information provided in **Table 1.1** above that the future figures for long stay parking have been calculated from a baseline that includes the off-site parking provision of what was at the time 26,280 spaces (which included some unauthorised spaces). We understand from information² provided by CBC that there were just over 19,000 authorised off-airport spaces in 2022. We are advised that there is no reason in law and no evidence on the facts that any of that lawful off-airport parking will be removed in the future and therefore the Arup assessment appears to include double counting of the overall requirement. This is a point also made by Mott Macdonald in their representation for GGL and, like them, we believe this is very significant to the assessment of need for the total area of land claimed by GAL.

Car Mode share reductions not adequately taken into account

16. We note that GAL sets out its aspirations for mode share in the 2019 master plan indicating a plan to improve public transport use by passengers and staff. CAA passenger survey data shows a general downward trend in private car use at Gatwick with approximately 59% private car and taxi use in 2010 dropping to 52% in 2019. Data for 2022 shows a slight increase in car use but this is mostly likely a temporary shift in the trend due to Covid. Mott Macdonald highlights also that GAL’s longer term plan indicated in their 2014 Master Plan was to reduce car and taxi use to around 38% by 2050 / 95 mppa. However, more recently in the Airport’s DCO application, their Environmental Statement (ES)³ sets a commitment for “A minimum of 55% of air passenger journeys to and from the Airport to be made by public transport;” and “minimum of 55% of airport staff journeys to and from the Airport to be made by public transport, shared travel and active modes;” This document also sets out longer term aspirations for the public transport use to be a minimum of 60%⁴ which suggests that for a potential wide space runway scenario, 60% is conservative.

¹ Table 1.2_1 - Baseline airport facilities, Table 3.7_1 Car Parking Provision for Eastern Zone, Table 4.5.2_1 Future Car Parking Space Requirements

² Information from 2022 Gatwick parking survey – data for Crawley, Horsham, Mid Sussex, Mole Valley, Tandridge and Reigate & Banstead

³ Environmental Statement: July 2023 - Appendix 5.4.1: Surface Access Commitments, page 5

⁴ Ibid, page 14

17. For a range of reasons, although primarily in relation to driving down carbon emissions, it is not surprising that GAL, like other airports, plans to reduce private car use. However, it is not clear why Arup has not made any attempt to factor this into their calculations for future car parking requirement especially in the longer term. As Mott Macdonald rightly point out, this is another reason why the assessment by Arup, exaggerates the overall future requirement for parking spaces.

Efficiency of car parking use – block parking, decking, MSCPs

18. When we look at the figures Arup use to calculate parking capacity per square meter, we again find an exaggeration that underestimates the capacity that can be provided for different parking solutions. What we think is key is the omission of block parked MSCP solutions that have much higher capacity per footprint area whether surface, decked or MSCP. As an example, Manchester Airport have recently implemented two block parked MSCPs, the larger of which delivers 8,000 long stay spaces on a footprint of only three hectares, and the smaller delivers approximately 6,000 on just 1.7ha. These car parks are over six storeys which for comparison is the same as the short stay MSCPs found at Gatwick.

19. **Table 1.2** below provides a comparison of the figures used by Arup for each car park type with alternative values drawn from actual benchmarked examples from Gatwick and Manchester airport car parks. We note that the examples from Manchester airport are all from MSCPs constructed in the last five years and so represent what is achievable with modern airport car park designs and economically deliverable for long stay car parking.

Table 1.2: Car Parking Density Values Comparison

	Arup Car Parking Density	Benchmark examples from LGW and MAN Car Parking Density
Surface	1 space per 20 m ²	1 space per 20 m ²
Decked	1 space per 31 m ² (15.6 m ² of ground floor area)	1 space per 24.5 m ² (12.2 m ² of ground floor area)
MSCP	1 space per 42 m ² (density by ground floor area subject to the number of floors)	1 space per 25 m ² (density by ground floor area subject to the number of floors)
Surface block	-	1 space per 16.5 m ²
Decked block	-	1 space per 17.5 m ² (8.8 m ² of ground floor area)
MSCP block	-	1 space per 17 - 20.5 m ² (density by ground floor area subject to the number of floors)

Source: Arup and York Aviation data

20. The comparison illustrates starkly that Arup’s assessment of parking requirement was conservative and not in line with the efficiencies available from modern car parking solutions particularly when considering block parking solutions for long-stay.

21. If we further consider the planned decked long stay on the existing North Terminal car park area, an estimated up to 5,750 spaces could be provided using conventional parking layouts. However, if 50% of the parking area was developed as block parked MSCP over 6 levels, similar to Manchester Airport, then we estimate up to 15,300 spaces could be provided over an area of just 10 hectares. We recognise that the NRP latest plans⁵ looked to scale back car parking provision in this area to what we understand to be just 2,000 spaces over an area half that was originally planned (approx. 5ha.),

⁵ Northern Runway Project - Design & Access Statement, volume 1, Book 7, v1.0, July 2023, page 60

but note that the original area of around 10ha. in principle could accommodate a much greater number of spaces if needed.

22. In addition to this if we consider using a similar combination of decked conventional and block parked areas to the east of the rail line, as well as utilising conventional MSCP and surface parking solutions, it would be possible to accommodate any future parking requirement for up to 95 mppa on an area much smaller than the available area estimated by Mott Macdonald of approximately 94 ha. We concur with Mott Macdonald that the likely demand at 95 mppa is likely to be closer to 65,000 spaces or potentially less due to future mode share, other provision on the airport and particularly when considering the need to deduct the existing off-site parking provision.

Constraints

23. We recognise that building heights would be constrained in areas under the future take-off and approach slopes of the Obstacle Limitation Surface (OLS) however, we agree with Mott Macdonald's assessment of the impact suggests that the range of decked and MSCP solutions on offer can be accommodated within the constraints of the OLS. Furthermore, we believe it is possible that areas outside of the take-off and approach slopes could be used to accommodate some of the taller MSCP structures up to 6 storeys.

Airport Safeguarding Precedents

24. We think it is also important to highlight, that as far as we know there are no other airports in the UK that have land safeguarded for car parking provision or indeed ancillary land uses or facilities. We believe that the only UK airport aside from Gatwick that has any land safeguarded within a local development plan, is Edinburgh who have an area of land north of the existing runway safeguarded for a second runway which forms part of their current masterplan. As stated, the safeguarded land to the north is for the provision of a second wide spaced runway and as such would allow the airport to deliver new terminal infrastructure in the space between the runways, much like Gatwick has planned.

Conclusion

25. In summary, we do not believe there has been robust evidence provided on the quantum of land area needed to safeguard future car parking provision for a potential wide spaced runway scheme at Gatwick Airport. Insufficient detail is available on how the current NRP plans relate to the wide spaced runway scheme, particularly in terms of car parking provision. The approach to date has clearly been excessively cautious and we do not accept the claimed need for anything like the area of car parking shown. At its lowest:
 - a. The lawful use of off-site parking must be accounted for – reducing the requirement by 19,000;
 - b. The provision which has been made or will be made elsewhere on the airport before the southern runway comes forward must be accounted for;
 - c. An efficient use of land should be assumed and would dramatically reduce the required land;
 - d. There is no reason why decking and MSCPs cannot be used for long stay car parking significantly reducing land take.

YAL/02.11.23