

Appendix A

Draft Response to the Gatwick Airport Draft Master Plan Consultation

The Council's responses to the consultation questions are based on information in the draft master plan and publically available to date and are without prejudice to the view of the local planning authority in responding to future detailed proposals on the airport through any GDPO consultations, planning applications or during the Development Consent Order Process.

Qu. 1: Given the contents of the master plan, to what extent, if at all, do you support or oppose the principle of growing Gatwick by making best use of the existing runways in line with Government policy.

Strongly support / tend to support / neither support nor oppose / tend to oppose / strongly oppose / don't know

1.1 Response to be directed by Full Council.

Qu. 2: Please explain why you hold this view

2.1 Growth of the airport to 60mppa on the existing runway, or to 70mppa using the standby runway, are significant increases in passenger numbers, flights, staff and journeys to the airport, approximately 14 or 24 million passengers per annum compared to today. Some of the likely impacts of these significant increases on the local area are set out below, but for other impacts further information is required before the full impact can be properly understood, as outlined below.

Noise

2.2 Government noise policy (2013 Aviation Framework) is to *"limit and where possible reduce the number of people in the UK significantly affected by aircraft noise"*. It also states that the benefits of Aviation should be shared with the communities affected: *"We want to strike a fair balance between the negative impacts of noise (on health, amenity, (quality of life), and productivity) and the positive economic impacts of flights. As a general principle, the Government therefore expects that future growth in aviation should ensure that benefits are shared between the aviation industry and local communities. This means that the industry must continue to reduce and mitigate noise as airport capacity grows. As noise levels fall with technology improvements the aviation industry should be expected to share the benefits from these improvements."*

2.3 The 2013 Aviation Framework recommends continuing with 57dB $L_{Aeq,16hr}$ summer day contour as the onset of 'significant community annoyance', despite evidence demonstrating that that figure should be reduced to 54dB $L_{Aeq,16hr}$. The latest noise contours for Gatwick now include the 54dB contour. Increasing movements on the existing main runway runway to 60 per hour to achieve 60mppa, equates on average to one arrival or departure every 2 minutes during peak periods. An arrival overflight is audible for about 45 seconds and for departures it is nearly a minute. During the 'peak' periods, therefore, the noise from one aircraft would have just faded away as the noise of the next one would be heard, taking 30 seconds to reach its peak level as it flies overhead. The master plan refers to its intention for 'peak spreading' which will increase the number of hours and days that the maximum 60 ATMs per hour are

achieved. For residents, this will result in less quieter periods when aircraft are not audible.

- 2.4 It should also be noted that as the number of movements per hour has increased there has been an increase in go-arounds. Between 2004 and 2011 the percentage of go-arounds was averaging at 0.31% of all ATMs. However, this is now averaging around 0.46% as the airport is running at maximum ATM/hr more often. It is, therefore, to be expected that as both the number of ATMs and movements per hour increase then the number of go-arounds will increase disproportionately. A large proportion of the go-arounds go directly over Crawley.
- 2.5 Use of the standby runway for departures in addition to the increased capacity on the main runway will increase ATMs by 37% compared to this year. This will increase the number of overflights per hour experienced by residents along the Balcombe Road in Tinsley Green and Fernhill by over a third because, by using the standby runway for departures, an increase of arrivals can be achieved on the main runway. The master plan claims that the overall noise level (L_{Aeq}) will remain similar to the present noise levels as the increased number of flights is counteracted by the introduction of quieter new generation aircraft which are on average 4dB quieter on departure and 2dB quieter on arrival. It is not clear, however, how quickly these new generation aircraft will be phased in over the next 15 years.
- 2.6 However, this overall noise level contour is not a good indicator of the annoyance and harm caused by aircraft overflights because it averages noisy peak events to a single level over time whereas aircraft noise is experienced intermittently. It is recognised that, if a noise is intermittent, then it increases its annoyance. In the case of aircraft overflights it has been shown that as that intermittency increase then so does the annoyance. With aviation noise, if the number of movements is halved it only decreases the L_{eq} level by 3dB which would only just be noticeable. However, halving the number of overflights would be a significant change in the noise environment. There are noise contours, the N-above contours, which measure the number of noise events that exceed certain decibel levels, for example, the N65 contours would show the average daily contours of the number of events (200, 100, 50 & 25) where the maximum noise level is 65dB or above.
- 2.7 Recent research published by the World Health Organisation (WHO) has shown that 10-15 events of 45dB or more in a bedroom during the night has a negative impact on health, including sleep disturbance, an increased risk of cardio-vascular disease, annoyance, loss in productivity, increase in accidents and recent research is showing an increased risk of dementia. This disturbance can be measured by the N60 contour which equates to a maximum level of 60dB L_{Amax} outside which is equivalent to the 45dB L_{Amax} inside a bedroom with its window partially opened for ventilation. These N65 and N60 contours are not included in the master plan so a proper assessment of “significant impact” cannot be made. These should go down to the 10 contour, particularly at night. It is likely that, overall the N65 and N60 contours will shrink further away from the airport but expand closer to it. Therefore, the 37% increase in overflights will increase the impact of noise for residents close into the airport, like the Balcombe Road and Fernhill, having a negative impact on the health of those residents, especially at night.
- 2.8 Also, the WHO research defines “night” as the period between 23:00 and 07:00, whereas the master plan refers to no increase in flights in the night quota period (23.30-06.00). There is, therefore, a likelihood of increased flights in both Scenario 1 and 2 late at night (23.00-23.30) and early in the morning (06.00 – 07.00) which will disturb sleep.

- 2.9 Government Policy with regards to night flights is summarised in para 3.34 of the 2013 Aviation Strategy:

“The Government recognises that the costs on local communities are higher from aircraft noise during the night, particularly the health costs associated with sleep disturbance. Noise from aircraft at night is therefore widely regarded as the least acceptable aspect of aircraft operations.”

- 2.10 However, during the period 2017 to 2032, the number of residents inside the 48dB $L_{Aeq,8hr}$ contour (the equivalent ‘onset of community annoyance’ for night) grows from a predicted 9,100, with use of just the main runway, to 10,200 with use of both the main and standby runway. This is clearly inconsistent with Government Policy.
- 2.11 More details on how the 60 and 70 ATMs/hr will be achieved between arrivals and departures, and how “peak spreading” would operate through the year with the increased ATMs would be helpful in understanding noise impact.
- 2.12 Ground noise is likely to increase, particularly with the increased use of the taxiways closer to the airport boundary but there is no information on this.
- 2.13 There may also be some consequential noise issues with regards expansion and that is from the increase in traffic, possibly more obvious on the smaller roads where traffic is likely to increase to avoid increased congestion on the major roads.

Air Quality

- 2.14 Full technical assessments of the environmental impacts of the proposed existing runways schemes have not been fully investigated at this stage, although GAL propose to carry out a full Environmental Impact Assessment (EIA) if a DCO is brought forward. The master plan suggests that an early indication of the impacts is provided in work done by environmental consultants ARUP on the airport’s emissions inventory and air quality modelling which showed all modelled pollutant concentrations in the area around Gatwick were below the air quality limits in 2015, and predicts full compliance for all pollutants for 2028 with Scenario 1, single runway expansion (60mppa), and confidence that there will also be no exceedances with Scenario2, standby runway expansion (70mppa).
- 2.15 The council has concerns about the reliability of the modelling outcomes reported in the Air Quality Assessment since the modelled 2015 concentrations do not reflect measured results at roadside receptor points in Crawley. The modelling carried out by ARUP consistently under-estimated roadside pollutant concentrations by significant amounts at residential areas in the Hazelwick Air Quality Management Area (AQMA), under-estimating NO_2 by as much as 80-90% at some locations. This failure of the model to predict accurate roadside concentrations undermines trust in claims that there will be no exceedance of local air quality limits as a result of the proposed expansion schemes. Given the uncertainty, additional sensitivity tests are needed to evaluate some of the key assumptions used in the dispersion modelling for future air quality impacts.
- 2.16 As part of any air quality assessment for the proposed airport expansion scenarios the council would expect to see a calculation of the appropriate level of mitigation from the development, which monetises the cost of the direct negative effects of airport operations on air quality, health and the local environment. This is not currently provided in the master plan.

- 2.17 The acceptability of future expansion at the airport relies on its ability to effectively manage a range of impacts in line with legislative controls such as air quality objectives for a number of pollutants. A robust and credible monitoring network is therefore required on and off-airport. Monitoring is currently conducted in partnership with Reigate and Banstead Borough Council. However, future expansion in either scenario which impacts local roads in Crawley may require funding for detailed monitoring as part of mitigation measures.
- 2.18 More information is needed on the predicted growth in cargo related traffic in order to assess the impacts on traffic and air pollution in the surrounding area. There could also be potential short /long term increases in freight related traffic movements related to Brexit if perishable food imports are diverted via the airport border inspection facilities to avoid delays at the sea ports. More information on the impact of this future uncertainty should be included in road transport models for Gatwick's airport surface access strategy.
- 2.19 As set out in the Surface Access section, there are concerns about the robustness of the assumptions included in the surface transport modelling, including the accuracy of the mode share targets. The outputs from these models inform the assessment of air quality modelling and environmental impact and therefore full assessment of the impact of Gatwick expansion in either scenario on public transport and the existing local road network is a key part of any future environmental impact assessment. Further information is needed on how airport expansion may affect or delay the deliverability of air quality action plans (AQAPs) for compliance with national air quality objectives in the AQMAs around the airport in Crawley and Horley. Any air quality impact assessment should take account of these uncertainties and a range of scenarios should be considered for sensitivity tests on key assumptions such as delivery of surface access provision and modal share, emissions for future road vehicles and future aircraft technologies, to ensure there is a precautionary element built into the modelling process.

Carbon Emissions

- 2.20 Gatwick's halving of the emissions attributable to fuel and gas use at the airport and from the generation of electricity purchased by the airport in the last ten years is welcomed. However, carbon emissions overall have still increased by 7% because of the increases in emissions from surface access and the landing and take-off movements of aeroplane. The predicted increase in carbon emissions from increased flights, (a total 3.6% increase in CO₂ in 10 years for the single runway and 23% more CO₂ for the standby option), is of significant concern to the council in the light of the impact on residents' quality of life, the council's commitment to Zero Carbon by 2030 and the Intergovernmental Panel on Climate Change's latest recommendations on carbon reduction targets. The master plan states that Gatwick participates in Sustainable Aviation (SA) and the SA's Road Map aims to show how the aviation industry might achieve the target of reducing absolute CO₂ emissions to 2005 levels by 2050. The Road Map shows that UK aviation could achieve this reduction while more than doubling passenger numbers through operational improvements, airspace reforms, next and future generation aircraft, sustainable fuels and market-based measures. However, the SA Road Map depends on transition to sustainable fuels. The master plan describes the *"the huge opportunity presented by sustainable aviation fuels"* and states *"SA calculates that sustainable fuels could deliver up to 24% reduction in CO₂ emissions."* In fact, SA describes the sustainable fuels development saying *"the industry is very much in its infancy"* and its plan to meet the industry goal of halving CO₂ emissions *"will require a step change in*

government policy". It also says that it estimates that while a 15-24% reduction in CO₂ is possible, it assumes 18%. The council is therefore concerned that the potential for carbon emission reductions from aircraft could be overly optimistic.

- 2.21 Additionally, the voluntary Carbon Offsetting and Reduction Scheme in International Aviation (CORSIA), due to start in 2021, relies on carbon trading or offsetting to compensate actual emissions and encourages biofuels which may result in net CO₂ increases. Clarity in Gatwick's emissions data projections for Scenarios 1 and 2 is needed as they appear to include other greenhouse gases whereas the SA /CORSIA reductions estimates only cover CO₂.
- 2.22 The master plan suggests an increased proportion of the passengers will travel by bus or rail, citing the 48% target in the current ASAS and the 50% target for the additional runway to the south. There will, however, also be an overall significant increase in the number of vehicular trips to the airport, including freight-related vehicles. Surface transport is over a quarter of all carbon emissions at the airport and therefore this increase will be significant.

Employment:

- 2.23 The presence of the Airport has a notable influence on both the office and industrial, (particularly B8 storage & distribution), market in Crawley, with some of the borough's key employers related directly or indirectly to the aviation and transport industry. The master plan predicts significant increases in direct and indirect job numbers in the wider region for each scenario, increasing from 71,000 to provide 79,000 and 91,000 for Scenarios 1 and 2 respectively. It does not, however, provide detailed discussion as to the nature of the jobs proposed nor where they would be located. It would be helpful to understand the anticipated offer in terms of job type, sectors, anticipated skills required, and the proportion of jobs that would be classified as skilled/ semi-skilled/ unskilled. It is unclear if the proposed jobs are proposed to simply be an increase of the airport's existing job offer, or whether job growth associated with the different scenarios will create jobs in new sectors or new technologies. In relation to Scenario 2, it is also unclear as to the number of jobs that would be generated on-airport and those that would be indirect/catalytic off-airport employment. These are important considerations, as it is the range and types of jobs provided, as well as the overall level of growth and where the jobs will be located, that will determine the potential economic benefits to the local population of Crawley.
- 2.24 The master plan forecasts significant growth in air cargo and for Scenario 1 considers that this can be accommodated within the existing facility. However, it is not clear how the even greater intensification in freight operations for Scenario 2 and increased demand for B8 floorspace will be accommodated. An assessment of the quantum of floorspace that will be needed to support such an increase in freight operations and where it might be located is required as this will impact on land-take, as well as air quality and road capacity in the local area.
- 2.25 Any business floorspace needs arising from the draft master plan growth scenarios should be considered within the context of Crawley's significant unmet need for business land, and particularly within the context of its unmet B2/B8 floorspace needs. The Crawley Borough Local Plan identifies an overall need for 57.9 hectares of business land in Crawley over the Plan period to 2030. Crawley's constrained land supply position, which is significantly affected by the Government's requirement to safeguard land north of Manor Royal for a further runway at Gatwick Airport, means that there is an available business land supply pipeline of only 23 hectares, and, therefore, a business land supply shortfall of 35 hectares over the Plan period to 2030. In floorspace terms, Crawley's unmet need is significant in both the B1a/b

office (65,314 sqm) and B1c/B2/B8 (81,659 sqm) use classes. Whilst it is anticipated that a Strategic Business Park proposed at Horley by Reigate and Banstead Borough Council could potentially help accommodate a significant amount of Crawley's unmet office floorspace need, there remains a significant unmet need for industrial floorspace. The proposed increase in freight operations will inevitably generate further demand for industrial premises and, unless the Government requirement to safeguard land is lifted, this is very unlikely to be able to be accommodated in Crawley.

- 2.26 The draft master plan anticipates a need for further office and hotel capacity at the airport over the next fifteen years, and new office/hotel provision is identified as being required for each scenario. As is the case for industrial land, the draft master plan does not appear to provide a figure as to the amount of office floorspace that is likely to be required to support growth at the airport, and the council would strongly advise Gatwick to undertake work to assess the level of demand generated by each scenario. This should include an accurate assessment of existing floorspace provision on airport.
- 2.27 The Crawley Borough Local Plan seeks to ensure there is sufficient office accommodation on-airport to cater for the airport's operational needs, without requiring, in the future, the development of additional land to meet the needs of the airport as it expands. Policy GAT4 therefore outlines that the loss of airport-related office floorspace will only be permitted if it can be demonstrated that it will not have a detrimental effect on the long-term ability of the airport to meet the floorspace need necessary to meet the operational needs of the airport as it expands. In response to an increasing level of vacant office property currently at the airport, the council has in some cases allowed a temporary relaxation of conditions restricting on-airport offices to allow them to accommodate non airport related uses. Most recently, an application of this type has been received for the on-airport office space at First Point seeking the temporary 10 year use of the identified space for non-airport use. Supporting information submitted with the application finds there to be a landside on-airport office portfolio of 34,389sqm, of which 4,107sqm is vacant. The Council notes that Gatwick's approach, which seeks to enable use of 'surplus' existing office floorspace for non-airport use, would appear to be inconsistent with a master plan approach which is suggesting that additional office floorspace is required. Whilst it is appreciated that Gatwick's applications to declassify the use of on-airport office space generally seek to do so for a temporary period of time, it appears that the temporary 10 year declassification sought through the current First Point application would result in the office being in non-airport use at a time (leading up to 2027/28) when the airport will be significantly intensifying its operations (under Scenario 1 and/or 2), at which point this floorspace would presumably be required for airport-related use.
- 2.28 The council also notes that the much of the new office /hotel space proposed under the draft master plan scenarios would appear to be sited on locations currently occupied by airport car parking, necessitating the relocation of this parking further away from the terminals, and onto greenfield land. Such relocation of car parking could potentially be seen as reducing the effectiveness of Gatwick's approach to sustainably manage surface access to the airport and make the most efficient use of its limited land. For these reasons, the council would urge Gatwick to maximise the use of its existing on-airport office portfolio for airport-related uses before new office or hotel provision is provided. Any new office floorspace on the airport should be for airport-related purposes only.

Housing and Infrastructure:

- 2.29 The increase in jobs in each scenario could have significant implications in terms of housing need and impact on transport infrastructure in the local area. Crawley cannot meet its own identified housing need given its limited size, constrained land supply position, and other constraints such as aircraft noise. 2011 census data shows Crawley already attracts significant daily inward commuting flows (43,232), particularly from Horsham (6,159) and Mid Sussex (7,119) but also further afield. These established travel to work patterns suggest that the significant level of job growth identified in the master plan under each scenario is highly likely to generate additional in-commuting, placing strain on the existing infrastructure. Such significant job growth is also likely to generate substantial additional housing need, which will add to Crawley's unmet need and add to pressures under the Duty to Co-operate for neighbouring authorities to allocate land for additional housing, including affordable housing, to help meet the need. Crawley has already experienced incremental, unplanned housing development on its boundaries without supporting infrastructure and would not want the growth of the airport to add to this demand.
- 2.30 Given the already significant housing pressures in the Gatwick Diamond, and the current strain on transport infrastructure, Gatwick will need to undertake detailed work and provide financial contributions to support the growth of the airport, in order to ensure that the implications of anticipated growth in housing need and its associated infrastructure needs are fully understood, appropriately planned for and funded. Infrastructure requirements will include facilities to support the housing, such as additional schools, health provision and sewage treatment facilities. The affordability of housing in the area should also be considered against the nature of the new jobs being established, with the potential for Key Worker housing explored.

Surface Access

- 2.31 The significant growth in passenger numbers, jobs and cargo in all scenarios has to be considered in terms of its impact on surface access and, based on the information set out in the master plan, the council has concerns in this regard:-
- 2.32 **Road Infrastructure:** There is significant congestion already arising on the strategic road network in the area and on local roads. Gatwick's road transport modelling predicts the local road network will be able to accommodate growth to around 60mppa without significant deterioration in performance (Scenario 1). This could be due to the spreading of peak times and seasons for ATMs, but considerable new car parking is being proposed which suggests increased car journeys even at peak times. The modelling takes into account the current M23 Smart Motorway upgrades, improvements to North and South Terminal roundabouts and assumes public transport modal shift of 48% are achieved as per the Airport Surface Access Strategy (ASAS). Scenario 2 (using the standby runway) would see the airport's growth to around 70mppa. There is very little information on the road improvements that would be needed to cater for this higher growth level. It is unclear what assumptions have fed into the modelling for both scenarios. For example, paragraph 4.4.31 states that the ASAS estimates that road traffic will increase by no more than 1% per year for the next ten years but is not clear whether this includes the potential growth in the Scenarios as the ASAS only covers the next five years and was published before the master plan. Also, it is not known whether the modelling includes all planned development in the wider area likely to use the road corridors, and whether there would be any spare capacity to support airport growth once the identified improvements have overcome existing capacity problems and met planned growth. The council has concerns that the road capacity may not be sufficient to accommodate the additional airport-related journeys, leading to increased congestion

and considers that funding from Gatwick towards further road improvements will be necessary.

- 2.33 It is understood that the vast majority of passengers arriving by car do so from the north on the M23, though detailed transport modelling information will be needed to establish where and when the anticipated journeys for the remainder of passengers, and particularly for the large increase in staff, will occur and what impact these will have on already congested junctions on local roads at peak times. Gatwick's own representations on the Horley Strategic Business Park at the recent Reigate & Banstead Development Management Policies Examination, (Matter 10), raised significant concern as to the ability of the M23 spur, in its current unimproved form, to accommodate both the proposed Business Park and planned growth of the airport to 2023 (52.8mppa). It is presumed that the level of growth identified under Scenarios 1 and 2, which, notwithstanding the 2018 ASAS target of 48% passenger access by public transport, will inevitably generate a further significant increase in car journeys to the airport has not been included in this modelling.
- 2.34 Both scenarios 1 and 2 also propose significant increases in cargo tonnage which will increase freight-related journeys to the airport. Given that the existing on-airport cargo sheds are owned by a third party with a long-term ground lease, it is by no means certain that the level of freight growth even under Scenario 1 could be accommodated on-airport and it is not clear where the increased floorspace for Scenario 2 will be located. As such, greater detail is needed required to understand how increases in cargo movement, as planned under Scenarios 1 and 2, could impact traffic, noise and air pollution in the surrounding area and on major roads serving the airport.
- 2.35 The council is therefore sceptical that the growth in both scenarios can be accommodated on the road network with just the current Smart Motorway works and some further improvements to the North and South Terminal roundabouts. It is considered further fundamental road improvements will be required on the strategic road network. Improvements to other routes, such as the A22 and the A24 should be considered to improve the resilience of road access to the airport as any incident on the M23 causes considerable delays in accessing the airport. There is also a need to consider impacts on local road network further afield than just the terminals. Modelling should assess what is likely to be a considerable increase in traffic anticipated through Crawley particularly on the A264, and on the A23 for journeys from the west, which will need to be considered and appropriately addressed.
- 2.36 Although there are proposals to deliver a reduction in air passenger "kiss and fly", by providing more on-airport parking, there is no information on how this impacts modal split and trip generation. In the Masterplan, 'park and fly', which generates two vehicle movements, is favoured over "kiss and fly", which generates four, and off-airport parking outside of the airport boundary is not seen as in keeping with promoting sustainable travel for surface access to the airport. The council would wish to see predictive modelling based on robust assumptions.
- 2.37 On-Airport Parking: Airport parking is an important local issue. As per the S106 legal agreement between CBC, WSCC and GAL, the airport is required to provide sufficient, but no more, parking than is required to meet its modal share obligations. In order to achieve this, the master plan states that 9,565 new spaces will be delivered on-airport up to 2023. Beyond this, Scenarios 1 and 2 identify two additional areas that GAL believes could be used for surface car parking, these being situated at the south west of the airport adjacent to Purple Parking, and on land outside the existing (Local Plan) airport boundary. The former of these sites is

located some way from the existing south terminal, and the council considers that more sustainable on-airport locations would be preferable. The latter site is subject to biodiversity constraints, and were this site to be utilised for parking, an extensive landscape buffer would be required.

- 2.38 In order to develop the airport in the most efficient way, the council's preference would be that all opportunities to intensify use of its existing on-airport surface car parking are maximised, through decking and/or additional valet block parking, before any new on-airport surface parking sites are considered. This approach appears to be planned for any additional parking required under Scenario 2 (5.3.29), and CBC would urge Gatwick to apply the same approach to any additional parking needed under Scenarios 1 (and 3). The council note that paragraph 5.2.9 refers to Purple Parking as 'off-airport'. This is not correct, as the company operates from a site that is situated within the Local Plan's airport boundary, and in terms of Local Plan Policy GAT3 represents an on-airport location.
- 2.39 Rail Access: Improving mode share by public transport, particularly rail, is key to Gatwick's surface access strategy, and will help reduce the amount of growth in road traffic. It is noted that Network Rail is currently consulting on plans to 'unblock' the Croydon bottleneck, a programme of works that is proposed in order to address capacity issues and reduce delays on the Brighton mainline. It is understood that these works are proposed to address existing capacity issues, and it is not known whether they will be sufficient to cater for the future growth in passengers and staff journeys to the airport at the levels now suggested in the master plan. Planned improvements to Gatwick Railway Station will address existing qualitative and quantitative issues, and it is appreciated will incrementally facilitate planned growth based over the next five years. However, the current planning application for the airport station only refers to accommodating growth to 48mppa, yet the master plan relies on these improvements for its proposed growth to 70mppa. It is not, therefore, known whether they will be sufficient to accommodate this higher level of growth.
- 2.40 There is also no mention of the capacity of the trains themselves which are already crowded at peak times. Gatwick aims to increase rail travel from its current 39% to 45% by taking up increased capacity provided by new rolling stock on services calling at the airport over the next decade. Beyond this point, if the ceiling capacity on the rail service is reached but passenger and staff throughput continues to rise, the percentage modal share by rail will decrease, placing more pressure on vehicle access. In order that rail can fully meet its potential to help reduce car journeys to the airport, it is considered that funding from Gatwick towards further capacity improvements on the Brighton Mainline and at Gatwick Station is likely to be necessary to cater for the levels of growth to 60 and 70mppa (Scenarios 1 and 2) with the modal shift it proposes. Improvements should also be considered for the North Downs line to improve resilience in rail access to the airport.
- 2.41 Bus and Active Travel: The master plan provides very limited information on bus travel, just suggesting that additional bus and coach station capacity might be required at the terminals. Bus travel is particularly important for staff locally accessing the airport and the council is concerned that additional services and/or capacity may be required. Active travel modes are also used by staff and are only mentioned with reference to a future Transport Assessment for the DCO process.

Qu. 3: Given the draft master plan looks out beyond 2030, to what extent, if at all, do you agree or disagree that land that has been safeguarded since 2006 should continue to be safeguarded for the future construction of an additional main runway?

Strongly agree / tend to agree / neither agree nor disagree / tend to disagree / strongly disagree / don't know

3.1 The council **strongly disagrees** that land should continue to be safeguarded for the future construction of an additional main runway.

Qu 4: Please explain why you hold this view

- 4.1 Land south of the airport is currently safeguarded from development in the Local Plan, Policy GAT2, as directed by the Government's Aviation White Paper 2003. In its response to the consultation by the Airports Commission on "Additional Runway Options in the South East" in January 2015, the Council resolved that *"the interests of Crawley residents and businesses are best served by the Council objecting to a second runway being developed at Gatwick."* The Council recognised the economic benefits of airport growth but raised significant concerns about the impacts, including noise, air quality, traffic congestion, land take and visual impact, it would have on the town of Crawley. The noise impact, for example, would be dramatic. The number of people "significantly affected" by the 57dB $L_{Aeq,16\text{ hr}}$ contour increases from 3,400 to 15,400 by 2040. The increase in the 54dB contour is from 10,950 to 15,400 with similar percentage increases for the more damaging 60 and 63 dB contours. The main contribution to this increase would be residents of Forgewood, Langley Green and Ifield. Night contours have not been produced but it is likely the outer 48dB contour would cover a similar area to the 54dB contour. There would be a new 'wrap-around' route to the south of Crawley (similar to the existing northern wrap-around) which would run between Horsham and Crawley. The noise from this, even though outside the 54dB contour will affect Bewbush and Broadfield as the individual events will be clearly audible and likely to disturb residents sleep at night.
- 4.2 The uncertainty over the provision of funding and the delivery of infrastructure improvements to support an expanded airport and the additional housing that would be required in the area was also a concern. Therefore, as the Council has objected to a second full runway to the south of the main runway, and because the borough has considerable unmet employment needs much of which could be accommodated within this area which currently extends to 523ha, it is recommended that the Council only supports the future safeguarding of land south of the airport if directed to do so by the Government in the forthcoming Aviation Strategy, anticipated in December 2018.
- 4.3 Should the Government's new Strategy direct the Council to continue to safeguard land for a potential future runway, the boundary shown in the master plan would be used as the safeguarding boundary for the Local Plan review. If the Aviation Strategy does not provide clarity on this point, and the council does not safeguard the land in its new Local Plan, the issue could become a key point of debate at the Local Plan Examination, and ultimately it will be for the Planning Inspectorate to determine. Prior to that, the council will seek to engage with GAL, the DfT and PINS.
- 4.4 The Council's response to the Airports Commission on a wide range of concerns, suggested improvements and possible mitigations to the additional runway scheme is also attached as additional information.

Qu 5: What more, if anything, do you believe should be done to maximise the employment and economic benefits resulting from Gatwick's continued growth?

5.1 As collectively the largest employer in the borough, Gatwick should take a more proactive role and provide more funding to help improve the social mobility of Crawley residents. Gatwick is a key partner in the Crawley Growth Deal, though there does not appear to be any mention of Crawley Growth Programme within the draft master plan. Among other priorities, Crawley Growth Deal seeks to better enable local residents to access higher skills levels and better quality employment opportunities. The council is committed to ensuring that residents have access to all employment opportunities at the airport, not just the low skills, low paid jobs. This would help minimise the distance of staff journeys to work and support the local economy. Therefore, the council believes that the draft master plan would benefit from greater focus on Crawley residents and their relationship to the airport. It would be helpful if Gatwick could:

- Consider the type and sector of jobs being created, enabling anticipated skill needs to be identified so that new jobs can be better matched with the local workforce.
- Provide information on the number of Crawley residents who work at the airport and what their average wages are. The report provides figures on a regional basis, but a more detailed breakdown would be helpful to understand the true, local impact of each scenario.
- Outline what plans Gatwick has to encourage businesses within the airport boundary to recruit from the local workforce, across all sectors, skills and salaries.
- Given the identified growth in jobs and value of development investment, there is a real case for Gatwick to engage with the Construction Industry Training Board on apprenticeships and training. This has great potential to unlock further funding and would, of course, complement the positive work between the council and Gatwick on Town Centre Skills Academy, the flagship project in the Employment & Skills Plan. This should consider focus on Gatwick's apprenticeships to ensure that there is a commitment to specifically supporting local people in accessing these opportunities.
- Section 7 (Education) does not provide any mention of Crawley College (nor East Surrey College). There appears to be focus on building and maintaining relationships with the regional universities, but the council would urge Gatwick to extend consideration to all HE/FE institutions. This will enable local education providers to programme courses that are in line with future job requirements at the airport, emphasising the importance of providing local residents with the right skills.
- There appears to be no mention of how Gatwick could support the local visitor economy, for example through encouraging visitors to stay in and visit local towns and make use of their facilities, services and attractions.

Qu 6: What more, if anything, do you think should be done to minimise the noise impacts of Gatwick's continued growth?

- 6.1 As explained in Qu 2, provision of the N60 and N65 noise contours which measure the number of noise events that exceed certain decibel levels would aid understanding of those residents who would be significantly affected by noise impacts. Gatwick could then consider expanding its compensation and noise mitigation schemes for Scenarios 1 and 2, as discussed for the additional runway scenario and submitted to the Airports Commission but not referred to for the main and standby runway Scenarios.
- 6.2 Gatwick could use the WHO guidance on night noise and commit to not increasing flights during the night period of 23.00 – 07.00, rather than just the shorter night quota period, (23.30 - 06.00). It could also commit to reducing the number of flights at night, as with the night flight ban being discussed for Heathrow. Non-scheduled arrivals or departures during the night quota period caused by something outside of the control of the airline or airport, for example bad weather or air traffic control strikes, are classed as dispensations. They allow these delayed flights to take off or land during the night without adding to the total quota figure. However, dispensations are increasing, and totalled nearly 10% of the summer 2018 total night quota, effectively adding to the number of flights during the night. As these delays are inevitably going to occur, it is considered a buffer for dispensation should be included within the scheduling of flights at night so that the night quota is not routinely exceeded. Proposals to reduce the negative impact of flights during the night could include:-

For Scenarios 1 and 2:

- i) No increase in ATMs on the main runway from 2018 levels during the night period 23.00 – 07.00, in both scenarios 1 and 2;
- ii) Including dispensations into the 11,200 night quota movement limit (using up carry over if necessary);
- iii) Ban on any movements of the noisiest class of aircraft (QC4s), even with dispensations;

And for Scenario 2:

- iv) No movements from the standby runway during the night period 23.00 – 07.00 except when the main runway is non-operational.
- 6.3 Incentives for airlines bringing in the new generation aircraft, or penalties in the form of additional charges for noisier aircraft could speed up the introduction of these quieter aircraft. This could include:-
- i) Only new generation quieter aircraft (Airbus NEOs and Boeing MAXs) to use the standby runway.

Qu 7: What more, if anything, do you think should be done to minimise the other environmental impacts of Gatwick's continued growth?

Water

- 7.1 In relation to surface water and flood related issues, it is recognised that there is currently a network of existing attenuation features on-site, prior to discharge, to help control discharge rate & water quality. It is known that (in general) all localised flows on the airport currently drain to Pond D & are subsequently pumped into the adjacent River Mole or existing water quality lagoon. It is noted that use of the standby runway is unlikely to directly increase the amount of impervious area on the current site, although there are a number of associated infrastructure projects, including major changes to existing parking arrangement and the introduction of a new 1500 space multi-story carpark that will significantly increase the amount of hardstanding. The council would wish to reiterate that there will normally be significant surface water and flooding concerns with any such redevelopment projects.
- 7.2 The draft master plan contains limited detail on new measures proposed to mitigate future surface water and flooding issues, with paragraph 6.2.5 setting out that '*climate change mitigation and adaptation continues to be a core consideration for all present and future flooding...a range of risk reduction measures are available to address flood risk...these will be fully explored as projects are brought forward*'. Section 6.8 discusses the option of either building a new balancing pond, or increasing the capacity of existing pollution lagoons. It is noted that although reference is made to the potential need for a new balancing pond being necessitated by use of the standby runway, it is not clear on the corresponding Plans where this is proposed to be located. Section 6.8.16 advises that GAL is considering further opportunities to manage & reduce flood risk at the airport and within the local community, with the section going on to indicate a number of existing measures (SuDs and attenuation etc.) that are currently employed as well as additional measures that are potentially proposed. Overall the draft master plan indicates that the impact of development in flood risk terms will be attenuated on site, and thus appears to address all associated flood & drainage issues, all be it, currently at a non-specific, low detail level. The council understands, therefore, that development proposed under Scenarios 1 and 2 is unlikely to have flood risk implications for Crawley's urban area. With regards to wider issues of flood risk, Gatwick may also wish to consider the Environment Agency's emerging hydraulic study for the Upper Mole catchment, which the council understands is nearly complete.

Biodiversity

- 7.3 The amended airport boundary proposed by Gatwick in the draft master plan would incorporate a significant area of countryside to the south east of the airport that, although owned by the airport, does not fall within the current Local Plan boundary. This countryside is subject to environmental designations, including an area of ancient woodland, and Local Plan designations including a Biodiversity Opportunity Area and Site of Nature Conservation Area importance. Given the recognised biodiversity value of this land, the council is concerned that significant new surface car parking is proposed even for Scenario 1 on part of the Biodiversity Opportunity Area west of Balcombe Road, as well as the decking of existing parking proposed adjacent to the Ancient Woodland. This would require a significant landscape buffer to the Ancient Woodland. The council's preference would be for Gatwick to prioritise the efficient use of its existing surface car park assets, through intensification such as decking and block parking, rather than seeking to develop further surface car parking on land of biodiversity value that is currently identified as countryside. With Scenario 3, a very large extent of surface parking is proposed in the countryside to the east of the airport. Again, it is considered more efficient use of the land could minimise the land take required.

- 7.4 There is limited mention in the master plan of the ecological impacts of the identified works in the North West Zone of the airport, such as a possible new hangar, holding area and noise bund, and increased balancing pond capacity. This area is adjacent to Ancient Woodland and other important ecological assets, including rare bats and veteran trees. It is also a Zone 3 floodplain. The master plan should set out how any impacts on the important biodiversity assets in this area will be minimised and, if necessary, mitigated. The master plan boundary changes incorporate an agricultural field to the north west of the airport into the boundary, following the agreed purchase of this land. Given the proximity of this land to Charlwood and on-airport ecological assets, its use to enhance biodiversity and reduce the visual impact of the airport would be encouraged and the overall future strategy for biodiversity and landscaping across the airport should be made clear.

Waste:

- 7.5 The master plan highlights the existing waste to heat generation plant on the airport but it is not clear whether this could be expanded to support the growth scenarios, or whether another facility would be needed to continue this important initiative.

Qu 8: Do you believe our approach to community engagement, as described in the draft master plan, should be improved, and if so, how?

- 8.1 Gatwick's community engagement is limited and does not reach out to the immediate community in effective ways. For example, the consultation on the master plan with one off events leaves a large gap with really ensuring that local residents are able to engage in a meaningful way. There is reliance on certain formal stakeholder groups, with GATCOM seen to represent the community. The approach to community engagement is internally focussed with the expectation that residents will know about events and how/who to raise issues with. It does not state how Gatwick will promote these opportunities. Gatwick could be more engaged with the local voluntary sector, including CCVS, to provide engagement information to all communities. The council has excellent contacts with a variety of community groups, neighbourhood forums and hard to reach groups and is happy to discuss engagement further.

Qu 9: If you use Gatwick, what areas of the passenger experience would you like to see improved?

- 9.1 Not applicable

Qu 10: Are there any aspects of our Surface Access Strategy that you believe should be improved and, if so, what are they?

- 10.1 The draft master plan states that through the Brighton mainline improvements, new timetables, and the ongoing Smart Motorway works, there will be sufficient capacity to accommodate the increase in journeys that growth of the airport will generate. The council is of the view that these works were already required to cope with demand already in existence on these routes, and not the additional journeys arising from the levels of airport growth now detailed in the draft master plan. As such, it is considered that further assessment will be required to ensure that all impacts on the surface access network, arising from the master plan scenarios, can be appropriately planned for and to ensure that the further required improvements are delivered.

- 10.2 A possible mitigation measure for the significant increase in car journeys to the airport, even with an improved modal share target, could be a significant Local Roads Fund, as was proposed when the additional runway proposal was submitted to the Airports Commission. A significant contribution by Gatwick to the construction of a full Western Relief Road around Crawley, together with support to identify an appropriate alignment for the route minimising the need for compulsory purchase, would also help cater for staff and passenger traffic from the west. These initiatives would particularly help alleviate the current and increased pressure on the local roads in the Crawley area, including for staff, and could help facilitate increased bus capacity and a more efficient service.
- 10.3 Paragraph 5.4.9 outlines that for Scenario 3, planned improvements in rail, bus and coach infrastructure and services would enable Gatwick to achieve a very high use of sustainable modes of transport. This would include adjusted targets of 60% public transport mode share for passengers and a 50% sustainable mode share for staff. The council would suggest that Gatwick applies this level of modal share to Scenarios 1 and 2, with further investment in public transport, including funding increased capacity on the Brighton Mainline and additional local bus services, and supporting active travel. This would improve the sustainability of the growth of the airport and help reduce the impacts of increased road travel on congestion, air quality and greenhouse emissions.
- 10.4 Gatwick Airport is also a key transport hub in the region and improvements to facilities enabling modal interchange for all modes should be considered. Improvements to commuter travel using Gatwick Station could be made, for example, investment in access from the station to bus routes serving the airport, and to cycle parking enabling onward public transport and active travel links to employment centres such as Manor Royal. This could reduce car movements in the local area. Such improvements were proposed in the 2012 Gatwick Master Plan but have still not been fully implemented. The master plan provides very limited information on staff travel but a significant reduction in local car movements could be made by investment in incentives and facilities to encourage staff to walk, cycle or use buses, such as a significant contribution to the extension of the Fastway network. The description of the National Cycle Network Route which goes through the site (convenient for the rail station) is described as London to Brighton – it is London to Paris, via Eastbourne.
- 10.5 Other ideas could include developing the Blue City car club, expanding the network of drop-off /pick up points outside of London, including within Crawley; developing car sharing schemes for staff; giving consideration to developing a Clean Air Zone at the airport, with different charging levels for access by different types of vehicle.

Qu 11: Do you have any other comments to make about the Gatwick Airport draft master plan?

Airport Boundary

- 11.1 The master plan makes specific reference (para 2.3.6) to an amended airport boundary and recommend (para 2.3.6) that their “boundary represented in Plan 4 is adopted by other organisations wanting to illustrate the perimeter of the airport”. There are at least 9 differences between CBC’s current Local Plan airport boundary and this proposal, and there are significant implications for land, in relation to Local Plan Policies GAT1 and GAT3 in particular. The boundary is also drawn tightly around the Crawley Sewage Treatment Works which could constrain its ability to expand, if required in the future. The appropriate boundary for the airport will be assessed as part of the LPR, in discussion with GAL.

S106

- 11.2 There is joint S106 legal agreement between the Borough Council, West Sussex County Council and GAL. It is requested that GAL engage promptly in reviewing the contents of the Agreement to ensure that it fully addresses the implications of the growth scenarios set out in the master plan and can help ensure the mitigations suggested can be enforced.

Sewerage Infrastructure:

- 11.3 There is concern that the existing Crawley Sewage Treatment Works (STW) will not have sufficient capacity to handle the load associated with the expansion proposals, both in terms of increased passenger numbers and also any additional discharge required from the introduction of a further pollution pond/lagoon. Additional wastewater treatment facilities would likely therefore be required to accommodate the long term growth proposed for the area. The site is currently land locked by safeguarded land for the second runway, and Gatwick are suggesting it is included within their proposed airport boundary surrounded by their biodiversity area, and it is questioned as to whether Thames Water would be able to acquire any land to extend its site and whether there could be ecological constraints. The construction of a new treatment works will require long lead in times which should be factored into the proposals.

Safety:

- 11.4 It is understood the width of standby runway needs to be extended 12 metres to the north to ensure the distance from the main runway meet safety requirements. The master plan should clarify how this will be implemented to ensure safe operation. The master plan should also clarify how regional resilience will be affected by the loss of the standby runway for emergency purposes.