

## Gatwick Airport

Response to Crawley Borough Council  
Core Strategy Review:

‘Shaping the Future of Crawley’

August 2009



# Contents

- Context Page 3
- Main Themes Page 4
- Executive summary Page 5
- Response Page 6

# Context

Gatwick Airport welcomes the opportunity to respond to this consultation.

This response is to the Core Strategy Review proposed 'topic papers' which collectively form 'Shaping the Future of Crawley' which is currently open for consultation. We recognise that this is the first stage in the initial review of the overall options for the Core Strategy Review and as such we have provided appropriate outline responses to the questions posed in the majority of the consultation documents.

Gatwick Airport is the 2nd largest airport in the UK and is the world's busiest single runway airport. In 2008 over 34 million passengers used the airport. The nearest towns to Gatwick are Horley and Crawley which are located approximately two kilometres to the north-east and 5.5 kilometres to the south of the airport respectively with the suburbs of the towns bordering the airport site. Gatwick Airport is within the administrative boundary of Crawley Borough Council (CBC). The airport is the main economic driver within the sub region and therefore has a significant influence not only Crawley but the wider London and South East region.

Gatwick Airport supports many of the provisions proposed in the topic papers of the Core Strategy Review 'Shaping the Future of Crawley' and we are particularly encouraged by the intention to provide further policies addressing the possible sustainable growth of Gatwick Airport after 2019. We look forward to continuing working with the CBC to help shape and develop the new core strategy for Crawley.



## Main themes of Gatwick Airport's response

### Status of Gatwick Airport regarding change of ownership

- Gatwick Airport would like to highlight in this submission to CBC that it is likely that Gatwick Airport will be under separate ownership shortly. Therefore this submission represents the views of Gatwick Airport's management developed while the sale process is taking place. As such, this submission should be seen to supplement the views of BAA Ltd relating to this Consultation.
- It is also important to note that new owners of Gatwick Airport may well have further or different points that they wish to make to CBC at the appropriate time, and which may correspond to the further development of policy proposals subject to the Core Strategy Review process contained in this Consultation.
- CBC is asked to ensure that Gatwick Airport is added as a consultee for all future spatial planning consultation processes undertaken by CBC. Such documents should be addressed to Rita Burns, Spatial Planning & Policy Manager, Gatwick Airport.

### A more efficient and effective core strategy

- We support several of the proposed strategic planning proposals contained within the Core Strategy Review prepared by CBC, in particular the proposals in 'Shaping the Future of Crawley' that are aimed at:
  - creating a more focused, accessible and streamlined core strategy document
  - ensuring that the planning system drives forward sustainable high quality infrastructure development in Crawley to ensure that the town to attract people to live, work and visit
  - policies to encourage prosperous regeneration in the town and subsequently improving quality of life for residents and opportunities for the business community
  - the greater protection of Crawley's natural assets, and increasing the appropriate use of such assets as amenity corridors
  - the further promotion of an improved pedestrian experience within the town in line with increasing sustainable transport, tourism, health and recreation strategies
  - the promotion of cross boundary and collaborative working with key planning organisations and infrastructure providers involved in a strategic planning approach for the South East sub region
  - the provision of a more flexible framework for spatial planning and engagement
  - supporting strategic regional and national rail services
  - recognising the vital role of London's international linkages which are crucial to ensuring that Crawley excels.



## Executive summary

- Gatwick Airport supports the main objective of 'Shaping the Future of Crawley' which is to provide an effective and sustainable spatial planning framework for Crawley.
- We are encouraged by CBC's proposals in the consultation documents to take a more proactive approach, in planning policy terms, to the potential future growth of Gatwick Airport and by the recognition of the need to build on existing communications with strategic infrastructure providers, such as Gatwick Airport Limited. We welcome the opportunity to work with CBC to develop its proposals and new planning policies for future implementation in a revised Core Strategy.
- Forthcoming changes in the ownership of Gatwick Airport, together with the review of the arrangements for the economic regulation of UK airports, raises questions as to whether or not the current airports policy, favouring the provision of two new runways in the South East (one at Stansted and one at Heathrow) will be as appropriate in the future. The preparation of a National Policy Statement (NPS) on airports, will be a timely opportunity to consider whether these changing circumstances should be reflected and we believe therefore that it is important that the Core Strategy maintains the policy to safeguard land at Gatwick for possible second runway (given that the Core Strategy will be prepared in advance of the publication of the NPS).
- We look forward to strengthening our working relationship with the CBC to ensure that Crawley continues to encourage sustainable development and thrive in its position at the heart of the sub region.



## Response to the consultation

- We welcome the opportunity to comment on the consultation document ‘Shaping the future of Crawley’ – Core Strategy Review (CSR). We refer hereon with in this submission to ‘Shaping the Future of Crawley’ as the ‘Core Strategy Review (CSR)’ and to the individual policy sectors as they are referred to in each of the topic papers.
- The following sections detail our response to the relevant issues for the airport that are raised in the CSR documents.

### Topic paper 1 – core strategy review vision, objectives & development strategy

- We support the principle identified in topic paper 1 ‘key issues’ that the CSR should contain a robust policy for supporting the growth of the airport in its current form as a one runway two terminal airport. We believe it is also necessary for the CSR to include a clear policy statement on the need to safeguard land at Gatwick Airport for a possible wide-spaced second runway post 2019. This would be in line with both regional planning policy contained in the South East Plan Policy T9 and national planning policy on aviation contained in the Air Transport White Paper (ATWP) 2003.
- We agree with the proposals in topic paper 1 under ‘indication of options’ for the continued need to include in any chosen proposed policy scenario a set of supportive and proactive policies on sustainable transport and in particular the need for further rail station improvements.
- In terms of the scenario options proposed in topic paper 1 our preference would be for adoption of scenario 3 in the CSR. We strongly support the principle in scenario 3 to continue to safeguard for a possible second runway at Gatwick. However we would seek a text amendment to scenario 3 which currently states that ‘*the ATWP is preventing the Council meeting that (land allocation) requirement within its boundary*’. We believe that it is inappropriate for CBC to present such wording as the ATWP represents current national planning policy and in the hierarchy of the current plan led system must therefore be adhered to. In addition, the South East Plan positively supports the need to safeguard land at Gatwick for a possible second runway post 2019 and as current regional planning policy the CBC CSR is required to reflect this policy direction.
- It is our view that it would be more beneficial to the CSR if topic paper 1 had presented just two scenarios i.e. the existing scenario 1, and a new scenario which would be a combination of the proposed scenarios 2 and 3. This is mainly due to the high degree of similarity of the existing scenarios 2 and 3 which in our view only adds complexity when comparing the three scenarios.
- We support the development of a university centre or an improved higher education provision in Crawley as we believe that such an education facility would positively contribute towards building skill sets and enhancing work experiences and opportunities through links to the airport, Crawley and the wider region.
- We do support specific aspects of CBC’s initial ‘indication of potential direction’. We are in favour of the CRS in terms of:



- adopting a combination of the sub regional focus as well as a local planning emphasis as presented in the scenario's 1, 2 and 3
  - striving to ensure that Crawley with its support from Gatwick Airport remains a key economic force in the Gatwick Diamond
  - the implementation of a comprehensive transport strategy with a strong focus on sustainable transport.
- However we do not agree with a number of points contained in topic paper 1 namely;
    - That the 7,500 required residential dwellings should and can only be accommodated in the North East Sector (NES). This conflicts with both the ATWP and the Regional Spatial Strategy which both support the need to safeguard land for a possible wide-spaced second runway at Gatwick. We feel the approach taken by CBC needs to be more strategic and explore options for cross boundary working with neighbouring planning authorities in terms of housing provision. CBC has previously undertaken such approaches as demonstrated by the Joint Area Action Plan for the land West of Bewbush. A more flexible cross boundary approach to planning may assist in resolving the key housing land allocation shortfalls that continue to be a priority for the CSR, and would also serve to demonstrate CBC adopting a more spatial approach to land use planning as is considered to be current best practice.
    - We would like CBC to take into account the potential significant positive socio economic contribution to the town and surrounding region that future airport expansion will bring rather than at this stage not accepting future growth beyond 45mppa within its CSR.

## **Topic paper 2 – climate change and sustainability**

- Gatwick Airport agrees that in line with national planning policy, (in particular Planning Policy Statement 1 - Delivering Sustainable Development and the accompanying statement Planning & Climate Change), sustainability and limiting the factors which contribute toward accelerating global warming must be a central consideration of the CSR and a cross cutting theme throughout all of the CSR policies.
- We support the proposal in the CSR for the inclusion of sustainability in the assessments for new developments in the town. It is universally recognised that as natural resources become more finite it is important to ensure sustainability plays a key role in development and sustainable growth. We continuously strive to ensure that a sustainability focus is applied throughout all capital projects across the airport as we recognise that a sustainable approach is essential in ensuring our continued licence to operate and grow. We are currently considering a version of the BRE Environmental Assessment Method (BREEAM) as a standard by which to assess development projects. This may be an approach that CBC may also consider as it could readily be adopted in the CSR for all new build projects within the catchments.
- We consider that if an already approved and widely recognised sustainability assessment process, (such as BREEAM), is adopted by the CSR then CBC's sustainability objectives have a greater potential to be delivered. It is our opinion that if a recognised standard is



made the requirement by the CSR and appropriate guidance provided to developers then CBC's concerns regarding the deliverability of sustainability objectives and targets will be easier to qualify and benchmark.

- We believe that addressing concerns regarding climate change is a fundamentally important issue for all land use plans and planning policy documents. We support CBC's prioritisation of climate change in the CSR. It is our view that that the CSR should contain a definitive climate change strategy with deliverable targets and action plans which address both short-term and long-term time frames. We consider that it is also important that in setting such a strategy clear and accurate baseline data should be available to ensure the targets and actions developed are realistic and achievable. Key to the success of any local authority climate change strategy will be effective consultation and meaningful engagement with stakeholders. We are currently reviewing our environmental strategy for the airport and would welcome the opportunity to have an input into the development of a climate change strategy for Crawley. This way we could explore opportunities, share ideas and knowledge and ensure consistency through a more joined up approach. The approach that we are adopting will focus upon carbon management and the development of a low carbon strategy through appropriate targets and action plans which are set against robust carbon footprint data.
- We are encouraged by CBC's objective of achieving carbon neutral status in Crawley by 2050. However carbon neutrality continues to be a widely debated matter in terms of its realistic achievability hence our current approach in developing a low carbon strategy for the airport.

#### **Topic paper 4 – air quality, noise & flood**

- Gatwick Airport considers that in light of the national standards, all airports are required to comply with defined regulations and legislation, airports are also subject to significant scrutiny in terms of air quality and noise limits. The inclusion of a local specific policy within the CSR will not add value in our opinion as it would be unable to implement standards beyond those already adhered to by Gatwick Airport. We are extremely aware of air quality emission levels and acoustic matters relating to the airport. We are committed to working towards continuous improvements where practicable to effectively mitigate and manage any impacts on the local environment in line with national policy (i.e. Planning Policy Statement 23 Planning & Pollution Control), while ensuring sustainable and responsible growth as a commercial business.
- It is our strong opinion that it would at this stage be inappropriate for the CSR to consider any additional form of noise impact assessments in relation to a possible second runway at Gatwick Airport. At this stage we believe that this is a matter that we would oppose as it could create a number of unnecessary planning complications, for example blight, which we do not feel it is for the CSR to predict or manage at this time. Our view is that it is noise abatement techniques and standards for a possible second runway in the future at Gatwick Airport (and other environmental concerns) should be a matter for the ATWP Progress Report and the forthcoming national policy statement (NPS) for airports.



- We have recently produced our draft European Noise Directive (END) noise action plan. This document is currently out for consultation with stakeholders and will be verified by the Department for Transport (DfT) later this year.
- It is our opinion that the CSR review should continue to promote policies which are in accordance with national planning policy and current best practice i.e. policies which seek to appropriately locate new noise sensitive developments away from existing noise nuisance sources, and do not permit proposals which emit high levels of noise to be developed in close proximity of noise sensitive receptors.
- Gatwick Airport would support the reference to the current Strategic Flood Risk Assessment in the CSR as a vital aspect of delivering effective flood management and abatement. We approach flood risk through an airport wide strategic vision dealing with risks as a result of both on and off airport activity, including any planned growth. We are also working closely with regulators, particularly the Environment Agency, and local authorities to ensure an holistic approach is maintained to flood management. We feel that this a positive approach works and places an importance emphasis on links between local policy and wider strategic views.

## Topic paper 5 – housing

Gatwick Airport has freehold ownership of the great majority of the area lying within the airport boundary delineated by Crawley Borough Council on its adopted Local Development Framework (LDF) proposals map. A further area, bounded to the north by a section of the LDF airport boundary, to the west by the London - Brighton railway, to the south by Radford Road and to the east by Balcombe Road (B2036) is, with the exception of the Crawley sewage treatment works and the predominantly residential properties on Radford and Balcombe Roads, also in Gatwick Airports ownership. The northern boundary of the North East Sector (NES) partly abuts the latter area, and the NES itself lies around 600 to 1,900 metres from the airport boundary defined on the CBC LDF proposals map, and around 1,100 to 2,550 metres from the eastern end of Gatwick's main runway.

Gatwick Airport is a particularly interested party in relation to this topic paper due to the close proximity of the NES to the existing airport and, secondly, the Government's stated requirement, as set out in the 2003 Air Transport White Paper (ATWP) that:

- 'In case the conditions attached to the construction of a third Heathrow runway cannot be met, and since there is a strong case on its own merits for a new wide - spaced runway at Gatwick after 2019, land should be safeguarded for this'<sup>1</sup>.
- The requirement to keep open the option for a second wide - spaced mixed mode runway at Gatwick has wider implications than simply safeguarding the area of land that would be physically required for the airport's development. Specifically, the protection of the runway option has implications on the acceptability of noise sensitive development in areas that will be subject to significant changes in their exposure to aircraft noise outside the expanded airport boundary, such as the NES. These concerns form the main focus of this submission on topic paper 5.

---

<sup>1</sup> Document CD37: ATWP, Executive Summary, third bulleted conclusion on page 14



## Government policy

- The following policies outline the current approach to safeguarding for Gatwick Airport.
  - The Air Transport White Paper, 'The Future of Air Transport' (ATWP), sets out current UK airports policy<sup>2</sup>. It was published in December 2003 following detailed studies and extensive public consultation. In particular, paragraph 1.6 of the ATWP explains the Government's belief that a national strategic framework for the future development of airport capacity is needed in order, inter alia, to 'provide a clear policy framework against which airport operators, airlines, regional bodies and local authorities can plan ahead...; give greater certainty wherever possible to those living close to airports and their flight paths. Again, the lack of a clear long term strategy and the slow progress of decision making has helped create unnecessary blight, uncertainty and distress for many people.' Both of these points are relevant to policies presented in topic paper 5.
  - The Regional Spatial Strategy (the South East Plan<sup>3</sup>) includes a policy, T9, which relates to airports and includes a requirement for safeguarding for a possible runway at Gatwick. The policy states, inter alia, that i) relevant regional strategies, local development documents and local transport plans will include policies and proposals that support the development of Gatwick and Heathrow airports and safeguard land at Gatwick for a possible new runway after 2019 and ii) take account of airport operator master plans produced in accordance with the ATWP.
  - However, we would like to reiterate that the longer term expansion needs of Gatwick have not yet been resolved. The recently adopted South East Plan does not anticipate early resolution of the matter until the certainty of expansion plans at both Stansted and Heathrow airport are confirmed by Government. Therefore, our view is that any decision to develop any of the 2,700 dwellings in the NES at this time should be delayed until there national policy is clarified. We do not believe that the NES should be an option presented in the CSR at this time.
  - In addition it is important to highlight that the existence of a developed NES would be prejudicial to the option of a wide - spaced mixed mode runway at Gatwick and therefore development of the NES would be incompatible Policy T9 South East Plan.
  - The Government's requirement that land for a possible Gatwick second runway be safeguarded is reflected in the currently adopted CBC Local Development Framework (LDF) by the designation of the safeguarded area on Crawley's adopted LDF proposals map and by the inclusion of a related policy (G2) in the adopted LDF core strategy. This proposals map identifies land which will be safeguarded from development which would be incompatible with expansion of the airport to accommodate the construction of an additional wide-spaced runway (if required by national policy) together with a commensurate increase in facilities contributing to the safe and efficient

---

<sup>2</sup> Document CD37 – 'The Future of Air Transport' White Paper (December 2003)

<sup>3</sup> The South East Plan – Regional Spatial Strategy for the South East Of England



operation of the expanded airport in accordance with advice in PPG13 (Annex B). The LDF's attention to the safeguarding requirement has aligned the adopted LDF with the ATWP – recognising that the latter is a national policy of particular significance for its catchment area. We therefore, conclude that the existence of a developed NES would not only be prejudicial to the option of a second wide - spaced runway at Gatwick but would be incompatible with the adopted LDF core strategy and proposals map. It is our opinion that the CSR should not alter adopted CBC LDF policy position on this specific mater.

## Noise

- We would also like to raise the issue of the incompatibility of the NES with a second wide spaced runway at Gatwick and the implications that the development of the NES, as proposed in topic paper 5, would have on such a runway. The two matters are very closely interlinked and both relate to the aircraft noise that would be attributable to operations on a second Gatwick runway i.e. noise that would significantly affect the NES. The NES's potential exposure to aircraft noise raises questions as to its suitability for residential development and, in the event of such development occurring prior to the consideration of proposals for a second wide spaced runway, may also prejudice acceptability of a runway development that would inevitably expose the NES to significant noise disturbance.
- The various design constraints at Gatwick mean that there is no scope to make material changes to the location of a southern, wide spaced, mixed mode runway at Gatwick. The possibility of siting a runway to the north of the airport was considered as part of the SERAS studies that informed the compilation of the 2003 ATWP consultation reports, and for various reasons rejected. Whereas in accordance with the ATWP there is no site for a second Gatwick runway other than to the south of the airport, it does appear however from the various options presented in topic paper 5 that there are other locations in the sub region where housing could be developed as an alternative to the NES site.
- An inevitable consequence of developing the NES housing prior to the determination of a planning application for a second Gatwick runway would be to introduce a further significant constraint on the design and operation of the runway, as well as complicating the consideration of noise issues when that application came to be considered. In part this would be attributable to the increased number of people affected by particular levels of aircraft noise or numbers of individual events, and in part to a change in the spatial distribution of the affected population. The NES development would in effect create a situation in which affected residents would be living, in not dissimilar numbers, both to the south west and the south east of the airport (respectively in Langley Green/lfield and in the NES), rather than predominantly to the south west as at present.
- In terms of Gatwick's design and operation, the presence (rather than the absence) of a large residential community in the NES would significantly alter the number and distribution of Gatwick area residents exposed to aircraft noise. It could potentially change the results of a comparative evaluation of alternative runway options (an essential pre-requisite for the selection of the option for which planning permission would be sought). The NES's presence could also cause the outcome of that evaluation to be less advantageous to pre-existing communities than in the absence of the NES. This is a point that we consider to be unacceptable and therefore do not support the option presented in topic paper 5.



- We believe it is inappropriate for the CSR to present housing allocations in the NES, given its potential exposure to aircraft noise from a future second Gatwick runway. Government planning guidance directly address the acceptability of new housing development in areas where residents would be disturbed by noise, or indicate whether its acceptability might depend upon the number of homes potentially exposed to noise, and/or their character. PPG24 addresses the extent to which proposed development is consistent with acceptable levels of exposure to noise nuisance/disturbance.
- We also consider that planning policy is made clear from PPG24 paragraph 12 which highlights that future as well as existing noise sources need to be considered:
  - Local planning authorities should consider carefully in each case whether proposals for new noise-sensitive development would be incompatible with existing activities. Such development should not normally be permitted in areas which are – or are expected to become – subject to unacceptably high levels of noise. When determining planning applications for development which will be exposed to an existing noise source, local planning authorities should consider both the likely level of noise exposure at the time of the application and any increase that may reasonably be expected in the foreseeable future, for example at an airport’.
- We also believe that the planning policy principle as identified in PPG24 supports the need to remove option 1 and the NES site from the housing. The key guidance of relevance in PPG24 is the advice contained in paragraph 8 of annex 3, relating to noise from aircraft, in which it is stated that the 60dB LAeq contour is a “desirable upper limit for major new noise sensitive development”. Set in this context our calculations estimate that if developed the majority (60%) of NES residents would potentially be living in homes exposed to noise levels in excess of that desirable upper limit. This in our opinion would be unacceptable and a further reason why we do not support proposals in the CSR to develop the NES allocation policy given
- The advice in Paragraph 8 of Annex 3 is directly relevant to the CSR proposal for the NES, specifically paragraph 12.47:
  - ‘Whilst it may not be sensible to refuse planning permission for small scale housing development in a residential area already affected by noise, but rather to insulate that housing to protect the future inhabitants against noise, it is sensible, where noise sensitive development is required on a larger scale, to plan to separate that development from significant sources of aircraft noise’.
- We can conclude that on noise matters whilst the option of a second runway at Gatwick would not be frustrated if the NES development proceeds, the configuration and operating regime of any new runway might be altered, reducing the ultimate capacity of the airport. Guidance in PPG24 prevails as the principal material consideration to decisions as to the acceptability of noise sensitive development in areas such as the NES that are potentially subject to exposure to noise from a second Gatwick runway. This must be a material consideration in the CSR and is in conflict with the proposed policies in option 1 of topic paper 5.



## Commercial and economic considerations

- From an operational perspective any such compromises, would result in i) less capacity and less economic benefit relative to that of a wide spaced second runway with a mixed mode operation which would prejudice the airport owner's ability to develop a runway with a similar capacity to that proposed at either Heathrow or Stansted. A reduction in Gatwick's potential capacity would reduce the potential scale of the economic benefits that such an expansion could bring to the region and the nation as Gatwick is the economic driver of the sub region/ Gatwick Diamond.
- Therefore it can be concluded that if the NES housing policy option was developed then subsequent proposals for a second runway at Gatwick would be materially influenced by the presence of the NES, by reason of the existence of a new centre of population that would be exposed to undesirable levels of aircraft noise from a wide spaced runway operating in mixed mode. One consequence of permitting the NES development could be to force the adoption of a segregated mode runway operation and, possibly, a reduced runway separation, in order to protect future living conditions of residents of the NES, but possibly this would be potentially at the expense of the tranquillity of other, long established communities. Either of these options would reduce the ultimate capacity and economic benefits of a second runway and potentially the commercial case to develop one.

## Overview

- Our position in relation to the NES housing allocation can be summarised below:
  - Government policy requires the option for the development of a wide spaced, mixed mode, second runway at Gatwick to be kept open
  - Progress in delivering the policy, and future prospects (in a potentially more competitive airport environment) suggest that the likelihood of a runway being needed at Gatwick is at least as great, if not greater, now as it was in 2003 when the ATWP was published
  - The noise impact of the second runway, occurring in the NES, would exceed the level specified in Government Guidance (PPG24) as that acceptable for noise sensitive development
  - The noise impact on a previously developed NES would, in the event of a subsequent proposal for a second Gatwick runway, be prejudicial to the success of a planning application for a wide-spaced, mixed mode runway, potentially necessitating the selection of some other option, offering less airport capacity and reduced economic benefits to the nation, and consequently not fully compatible with the conclusions of the ATWP
  - The need to be mindful of the considerable weight which should be afforded to the requirement of national airports policy. The safeguarding requirement is specified in a White Paper and carried through into other policy documents such as the Regional Spatial Strategy is of such importance as to be the subject of a forthcoming national policy statement, demonstrates that it should be accorded more weight than policies relating to housing provision in Crawley.



## Topic paper 6 – employment

- Gatwick Airport is the 2<sup>nd</sup> largest airport in the UK. It is the world's busiest single runway airport and provides a major international gateway for predominantly for Crawley, the South East region and London.
- Gatwick is a significant employer and generates around 23,000 jobs on the airport campus. We estimate that an additional 4,000 people are employed off-site in roles directly related to the airport's operation and indirectly, Gatwick creates around a further 9,000 jobs. Around 32% of Gatwick based employees are Crawley residents. (Gatwick Employment Survey 2008). These job markets significantly boost the opportunity for Crawley residents. In addition we want to continue to work closely with CBC and other key stakeholders to ensure that we improve the way in which they travel to and from work.
- A Gatwick Airport Employment Survey in 2008 has highlighted some important trends for the airport and we intend to share this data in more detail with CBC so that impacts for Crawley can be better understood. Key statistics include:
  - number of total employees slightly lower than in 2002 (2008: 22,711 / 2002: 22,953)
  - total public transport mode share has increased by 7.7% (2008: 24.8% / 2002: 17.1%)
  - mode share for public bus and coach has doubled (2008: 12.8% / 2002: 5.9%)
- In terms of skills and occupations the survey has highlighted that the airport campus offers a wide diversity of jobs which in turn requires a spectrum of skill sets and capability. We would like to see this diversity supported within the CBC CSR so that we can work jointly with CBC to address their concerns regarding local and sub-regional economic deficiencies in particular those relating to aviation reliance for Crawley. We believe that it will be important to develop a joint strategy so that jobs can be retained at the airport to support our sustainable growth objectives. In addition, working with education service providers to identify future skill sets required and develop educational offers accordingly. For example, working with the Gatwick Diamond we have supported the University of Brighton's initiative to develop a university centre in Crawley.
- The airport is a significant generator of economic value for London and the South East economies. We are currently investing around £1billion between 2008 and 2013 to revitalise our infrastructure, improve the end to end passenger experience and increase capacity. This plan is a key enabler for Gatwick to reach its goal of 40 million passengers per year (mppa) over the next ten years. We recently commissioned Tribal (a research consultancy) to undertake an economic assessment of the airport when operating at 40 mppa. This study estimates that at 40 mppa, the gross value added (GVA) contribution of the airport in the London and South East economies is approximately £2.1 billion per year from the airport's operations (excluding the wider benefits of the airport for example, contributions to productivity gain or inward investment decisions) and confirms that Gatwick is a significant economic driver for the region. The GVA contribution of Gatwick compares favourably to the GVA contribution of the Port of London ("Port of London Economic Study", Port of London 2009) which at £2.7 billion is made up of 70 independently run terminals and wharves along 95 miles of the Thames. The contribution of Gatwick is from one single site.



- Gatwick plays a significant role in attracting and retaining inward investment in London and the South East. The airport facilitates trade and contributes to the global competitiveness objective of the South East Regional Economic Strategy of assisting more businesses to operate internationally.
- Almost 80% of our passengers are travelling to or from London and the South East (CAA 2008). Gatwick has almost 10% of the total UK in-bound tourism market (Travel Trends 2007). These international visits play an important role in generating economic benefits such as trade, hotel bookings and consumer spend.
- We believe that it is critically important to work closely with our customers (airlines and passengers) and stakeholders to understand how they are managing the current global economic downturn. In doing so we will be able to ensure that our facilities and services have the appropriate resilience and flexibility to meet future and long term growth customer and stakeholder expectations. Having the right regulatory framework and incentives for the future will be critically important as will a co-ordinated approach among transport sector regulators to ensure that strategic goals are aligned and investment plans delivered.
- We believe it is important that we recognise the role that airports can play in generating economic value and by association promote the town, city and region in which they are located. Increasing the efficiency of access to Gatwick would greatly contribute to the competitiveness of the region. Gatwick adds much value in this respect, being 30 minutes from Central London by train. The retention and enhancement of dedicated airport rail links such as the Gatwick Express so that it is as attractive both now and in the future will help to maintain the region's competitive position.
- Going forward it is important that we build on our strong working relationship with CBC to enable employment levels to be maintained at the airport and recognise the important economic role that Gatwick plays locally, regionally and at a national level.

## Topic paper 8 - transport

- We welcome the general approach taken for topic paper 8 as it is an approach which is shared by Gatwick Airport through our surface access strategy. Our commitment to both increasing the proportion of air passengers/staff using public transport and reducing the number of vehicular trips per passenger also supports the CSR's objective of reducing the need to travel and improving accessibility by sustainable travel modes. Our forthcoming surface access action plan will set out more specifically, the actions the airport is committed to in relatively reducing the vehicular trips to and from the airport.
- It is important that the CSR supports the objectives of the Gatwick Diamond but also contributes to the achievement of Gatwick Airport's surface access objectives. The prominence of the airport within the Crawley borough needs to be considered as such. In view of this, it must be stressed that, the very strategic nature of Gatwick Airport, as a major international gateway, requires local transport policies to facilitate its ease of access and development. The provision of high quality highway and public transport access is critical to the airport's success and the associated economic benefits it brings to Crawley's administrative area.



- A transport vision for Crawley should set out a list of transport challenges that need to be addressed in order of priority and proposed solutions to meet these challenges. A transport vision should be considered both in the context of being a facilitator of development in Crawley as well as needing to respond to the effects of it. Particular attention should be given to the airport as part of this with transport solutions being considered in a national, rather than local, context.
- It is clear that the proposed increase in households to 2026 outlined as part of the CSR requires significant improvements to the local transport infrastructure. Measures to reduce the need to travel and make greater use of public transport and cycling/walking should reduce the amount of new highway infrastructure required but extra resources are required to provide levels of service extensive enough to achieve strong modal shift. Gatwick Airport would welcome active involvement in identifying the priorities for transport infrastructure improvements in the future. We see some of the main challenges to be as follows (not exhaustive) and make reference to some of the activities we are doing to support these at Gatwick:
  - Ensuring there is sufficient investment in the strategic highways network (Highway Agency) to meet Crawley's access requirements – we are seeking to agree a programme of highways improvements to support the airport operating at 40mppa
  - Enhancing road and rail connectivity to and from Crawley to facilitate employment growth – we are lobbying for strategic investments in rail by working with Network Rail and making responses to long term strategies such as the Kent and Sussex Rail Utilisation Strategy (RUS) consultations
  - Improved public transport to major employment areas including the airport – we provide a dedicated public transport levy (fund) to support public transport services to and from the airport, a branded commuter product for staff travel and a published staff travel plan.
- It is our view that there are a number of other key topic papers that do require cross references to transport policies in the CSR, including housing, employment and town centre growth.
- We believe that the CSR should be further encouraging more sustainable modes of transport by providing attractive alternatives to the private car and where possible, encouraging car sharing.
- We would like to be involved in the debate about the provision of future park and ride facilities and about where and how such sites could be provided. However, in general terms, we would consider that, should significant resources be needed to deliver such a facility, these would be better directed at enhancing the existing public transport offer in Crawley. For airport passengers and staff, our car parking strategy considers that future parking requirements should be provided within the airport site. We recommend that the CSR reflects such a policy.
- It is our opinion that, in transport terms, it is important to understand clearly what are the major contributors of growth in the borough over the next 20 years and to plan/fund the solutions to this appropriately. Gatwick has the busiest airport rail station in the UK with over 12 million rail users in 2008 (Office of the Rail Regulator). We are continuing to work with Network Rail, the station owner, to ensure that appropriate investments are made for its enhancement. It is hoped that there will be some improvements to the station



including major track and signalling upgrades and a new platform delivered by 2012. We also have a longer term vision to create a completely new station building linked to the airport's entrance including a public transport interchange. Such a scheme would contribute greatly to improving the accessibility and quality of airport access across the region. We would therefore welcome a delivery plan for transport for both local and strategic access to and within Crawley.

- Existing local forms such as GATCOM, the Gatwick Diamond Connect Group and the Gatwick Airport Area Transport Forum can provide valuable support for the preparation of a delivery plan and we would be keen to be participate in helping to shape this. The forthcoming M25 to Gatwick Airport study supported by the Gatwick Diamond Connect Group (on behalf of the Regional Transport Board) should also provide a strategic input into this.

## Topic Paper 9 - Gatwick

### Current operations

- Gatwick Airport's current operation is based on the use of a single, main runway. It is the world's busiest single runway airport. The runway is complemented by a shorter 'standby' runway which is brought into use only when the main runway is closed – usually associated with planned maintenance. The close proximity of the runways precludes their simultaneous use.
- Our Interim Master plan states that the 'maximum use' of its runway is considered to be an annual total of around 282,000 aircraft movements (272,000 being PATMs), and that this figure will be achieved some years prior to the attainment of an annual passenger throughput of 40 million. The latter stages of growth to that passenger throughput will be reliant on an ongoing increase in average aircraft size and, consequently, the average number of passengers per flight.
- As noted in topic paper 9 the 1979 legal agreement between the then British Airports Authority and West Sussex County Council (WSCC) precludes the construction of a second main runway during the 40 year period ending on 13 August 2019. Paragraph 9.39 of Gatwick Airports Interim Master Plan observes that, if construction were to commence in late-summer 2019, a second runway could open in 2023 or early 2024 which is within the time period of CBC's proposed new core strategy.
- There is some uncertainty as to the duration of the current downturn in traffic, and as to how quickly Gatwick will recover to, and pass, its June 2008 peak. There is, however, little if any doubt that there will be an appreciable increase in the demand for air travel in the medium and longer term. This is evident in the latest government forecasts, which have stated that *'whilst growth may be affected by the current economic downturn, over the longer term we expect the sector to continue to expand'*. In our opinion the requirement to safeguard land for a possible second wide spaced runway at Gatwick Airport is still a key planning policy at a national, regional and local level. We therefore consider it vital that the CSR maintains a policy for safeguarding land for a possible new runway at Gatwick.



- However, there are areas of certainty related to the current development programmes to make Gatwick Airport a more attractive facility and efficient operation. We are currently investing around £1 billion between 2008 and 2013, to revitalise airport facilities, improve the end to end passenger journey and increase capacity. This plan will be a key enabler for Gatwick to reach its goal of 40 mppa by 2019. We expect to complete the majority of these projects in time for the 2012 Olympic and Paralympic Games. Hence we do consider it appropriate for the CSR to establish a policy basis for potential future growth to 45mppa within the lifespan of the plan.

### The Air Transport White Paper (ATWP)

- The 2003 White Paper, 'The Future of Air Transport' (ATWP), sets out current UK airports policy<sup>4</sup>.
- Paragraph 1.6 of the ATWP explains the Government's belief that a national strategic framework for the future development of airport capacity is needed in order, inter alia, to:
  - Provide a clear policy framework against which airport operators, airlines, regional bodies and local authorities can plan ahead
  - Give greater certainty wherever possible to those living close to airports and their flight paths. Again, the lack of a clear long term strategy and the slow progress of decision making has helped create unnecessary blight, uncertainty and distress for many people
  - Take a view of the long term demand for air travel and airport capacity, both for the country as a whole and across regions, and of the best long term strategy to respond to that demand, rather than addressing each separate proposal in a piecemeal and uncoordinated fashion.
- In relation to South East England the ATWP concluded inter alia that:
  - There is an urgent need for additional runway capacity ...
  - The first priority is to make best use of the existing runways ...
  - Provision should be made for two new runways ... by 2030<sup>5</sup>.
- We are encouraged that topic paper 9 does recognise paragraphs 11.69 – 11.83 of the ATWP which set out the government's position on Gatwick, with the key conclusion being included in the Executive Summary (see ATWP page14):
  - 'In case the conditions attached to the construction of a third Heathrow runway cannot be met, and since there is a strong case on its own merits for a new wide-spaced runway at Gatwick after 2019, land should be safeguarded for this.'
- We believe that the CSR adopts the principles laid out in national aviation policy and that the CSR continues to ensure a policy is developed to safeguard for the possibility of an additional runway at Gatwick until such a time that the Government provides a firm decision on runway capacity in the South East. We acknowledge that climate change is an important issue and we are committed to reducing carbon emissions at the airport.

---

<sup>4</sup> 'The Future of Air Transport' White Paper

<sup>5</sup> ATWP Executive Summary, page 13



We also have a part to play in addressing emissions from aviation in general, and this is considered in wider national and international frameworks.

- The impact of Gatwick's flights and airport operations also affect the lives of people who live around the airport and its flight paths. Issues such as noise and air pollution are key concerns and we work hard to monitor, reduce and mitigate these impacts. We publish an annual sustainability performance report and this year we will publish a carbon footprint for the airport's campus. We are also committed to our S106 legal agreement with CBC and WSCC which outlines our obligations and commitments to enable the airport to achieve sustainable growth to 40 mppa over the next ten years.
- If Gatwick were to consider a future growth we would also be committed to working to meet further stringent environmental targets and to limit environmental impacts in line with best practices and environmental regulation.

#### The Competition Commission's BAA airports market investigation

- Topic paper 9 acknowledges the Competition Commission's (CC) conclusions on its BAA Airports Market Investigation<sup>6</sup> which require the sale of both Gatwick and Stansted within less than two years from March 2009.
- Paragraph 10.375 of the CC's report recommends that the government should, in the context of the development of the NPS on Airports, consider the impact of the White Paper on the aviation market, particularly in the South-East, in the light of the divestment of Gatwick and then lends a degree of support to the case for a second runway at Gatwick, stating that: 'in particular, in developing the NPS on airports, the Government should give due consideration to the ambitions of the new owner of Gatwick Airport, including the possibility of a second runway at Gatwick after 2019'.
- Overall, the CC's position given current ownership uncertainty the need to keep open the option for a second runway at Gatwick is, in our view, an important policy to be recognised in the CSR – and given that the adopted core strategy is proposed to span through to the period of 2026 therefore covering the timeframe for the potential construction of a new runway.

#### Future National Policy Statement on Airports

- The Government has stated its intention to prepare and consult upon a National Policy Statement (NPS) on Airports, indicating that it will be based on the ATWP and that it is planned for publication in draft by 2011<sup>7</sup>. We believe this will be a timely opportunity for the Government to reflect on progress since 2003, having regard to various uncertainties about capacity provision in the South East and the DfT have now indicated that they will produce an ATWP Progress Report alongside of the NPS on airports. The CSR will be near adoption when the airports NPS is published and we would therefore recommend that in order to provide sufficient robustness to the policy document that the CSR does continue, (in line with the requirements national and regional planning policies), to include policies to safeguard the option for an additional runway at Gatwick, and that the CSR

---

<sup>6</sup> BAA airports market investigation – A report on the supply of airport services by BAA in the UK; Competition Commission, 19 March 2009

<sup>7</sup> Daily Hansard – Written Answers to questions 252657 and 252656; 3 February 2009: Column 1132W



also includes as set of policies that would address a potential second runway development in the latter part of the plan period. If the latter approach is not taken then we consider it important that the CSR identifies a mechanism to facilitate a policy review in the event of a second runway development being brought forward. We suggest that this would also be supported by comprehensive supplementary planning guidance.

#### The Regional Spatial Strategy (RSS) (the South East Plan)

- The recently adopted South East Plan<sup>8</sup> includes a policy, T9, which relates to airports and continues to includes a requirement for safeguarding land at Gatwick. The policy states, inter alia, that:
  - Relevant regional strategies, local development documents and Local Transport Plans will include policies and proposals that:
  - Support the development of Gatwick and Heathrow airports and safeguard land at Gatwick for a possible new runway after 2019....
  - Take account of airport operator master plans produced in accordance with the Aviation White Paper.
- In order to remain consistent with the RSS the CSR is required to develop policies to safeguard land at Gatwick.

#### Crawley Borough adopted LDF Core Strategy

- The Government's requirement that land for a possible Gatwick second runway be safeguarded is reflected in the adopted LDF by the designation of the safeguarded area on Crawley's adopted LDF proposals map and by the inclusion of a related policy (G2) in the adopted LDF Core Strategy:
  - The proposals map identifies land which will be safeguarded from development which would be incompatible with expansion of the airport to accommodate the construction of an additional wide-spaced runway (if required by national policy) together with a commensurate increase in facilities contributing to the safe and efficient operation of the expanded airport in accordance with advice in PPG13 (Annex B).
- The LDF's attention to the safeguarding requirement has aligned the LDF with the ATWP – recognising that the latter is a national policy of particular significance. It is vital therefore for the purposes of its own credibility that the CSR continues to support a policy to safeguard land at Gatwick for a potential second runway post 2019.

#### Safeguarding policy

- Government policy relating to the possible need for a second runway at Gatwick, as explained in the 2003 ATWP and subsequently reaffirmed and reinforced by various policy documents, are identified in this submission. We believe that in order to fully align with adopted national and regional planning policy there is a requirement for the CSR to

---

<sup>8</sup> The South East Plan 2009



keep open the option for a second runway at Gatwick until such a time that the government provides clarity on runway capacity in the South East.

- Forthcoming changes in the ownership of Gatwick Airport, together with the review of the arrangements for the economic regulation of UK airports, raises questions as to whether or not the current airports policy, favouring the provision of two new runways in the South East (one at Stansted and one at Heathrow) will be as appropriate in the future.
- The preparation of an NPS on airports, will be a timely opportunity to consider whether these changing circumstances should be reflected and we believe therefore that it is important that the CSR maintains the policy to safeguard land at Gatwick for possible second runway (given that the CSR will be prepared in advance of the publication of the NPS).

Other policy matters considered in Topic paper 9

- We consider it appropriate to allow a permanent relaxation on the use of office space for non-airport related purposes. We consider this to be an important step towards improving the diversity and vitality of the airport business setting, and that the expansion of the airport, to meet a wider business sector, will compliment business activities in Crawley and ultimately facilitate in attracting new businesses to the region. The importance of promoting Gatwick as an 'airport city' will be an important factor for economic success of the Crawley and its surrounding region. We will continue to work with developers who have interests in land surrounding Gatwick to drive improved economic success for the airport, region and its community.
- We will also continue working with CBC to explore opportunities in relation to car parking policies and schemes as part of our S106 legal agreement objectives and commercial policies.