



LONDON GATWICK



GAL's Objection to the Crawley Local Plan Proposed Main Modifications March 2024

25 March 2024

The following comments are submitted without prejudice to GAL's objection to the removal of land at Gatwick Green from the area safeguarded for the southern runway at Gatwick Airport.

1. Strategic Policy EC4: Strategic Employment Location

1.1. Extent and Timing of Allocation

- 1.1.1. The deletion of the requirement in EC4 (MM16) requiring additional evidence to develop beyond the identified need at Gatwick Green is not justified.
- 1.1.2. Crawley Borough Council (CBC) has updated its evidence base to include a higher need for 17.93ha of employment land (at MM13, MM14 and MM16) on the basis that the site on Fleming Way ([The Base](#)) has been completed. However, the site has not yet been occupied and is still being marketed. It is therefore available to meet need in the early part of the plan period.
- 1.1.3. The proposed modifications to the Planning Obligations Annex (MM40) confirm that the starting position for employment in 2021 is significantly lower than previously thought. This has reduced the council's estimate of current employment in the Borough from 100,000 to 85,000 jobs. This means that recent growth rates (on which the future trends are based) would also be significantly lower and therefore the extrapolation into the future should also be lower. This would reduce the level of need significantly.
- 1.1.4. [Table 2.1 of the January 2023 Economic Growth Assessment Supplementary Update for Crawley](#) [EGSM/EG/05] makes this absolutely clear. 85,000 jobs is significantly below the starting point for both the Oxford Economics and the Experian forecasts for the plan period. Those forecasts are based in part on recent trends. It is also well below both estimates for 2021. If the true number of jobs is used, then rather than the trend rate of growth being either 424 or 1,231 jobs per annum, the reality is there has been no employment growth since 2009 according to Oxford Economics and a small decline according to Experian.



LONDON GATWICK



Table 2.1 Total and Annual Employment Change in Crawley

Source	2023	2040	Change	
			No.	p.a.
Oxford Economics	98,347	105,782	7,435	413
Experian	105,500	117,800	12,300	683

Past Trends

Source	2009	2021	Change	
			No.	p.a.
BRES	80,705	87,380	6,675	513
Oxford Economics	85,589	91,103	5,515	424
Experian	87,100	103,100	16,000	1,231

Source: OE (2022) / Experian (2022) / BRES (2022) / Lichfields analysis

- 1.1.5. An allocation of 44ha (MM16) is therefore not supported by the objectively assessed evidence base and further objective evidence should be required before land over and above 17.93ha is released for development. An approach to allocate land beyond that objectively assessed, on the basis that the plan should be positively prepared, would be a misinterpretation of that principle.
- 1.1.6. The proposed deletion of the requirement to justify further industrial floorspace beyond the 17.93ha figure is particularly inappropriate given that (even if it is accepted that the extent of the employment need is sufficient to justify the release of some safeguarded land, which is not GAL’s contention) the need for strategic employment allocation needs to be balanced against the need for retention of land for its safeguarded purpose. These are particular circumstances relating to Crawley. This balancing exercise has not been undertaken and, in its absence, only the minimal release of land sufficient to meet the need demonstrated by the (objectively assessed) evidence could be justified.
- 1.1.7. Furthermore, if it is concluded that east of Balcombe Road should be released, there needs to be an assessment of what the most suitable land to be released is with respect to both access to the strategic road network and minimising the impact on the implementation of the Gatwick southern runway proposals. There has been insufficient engagement with stakeholders to investigate and understand this issue and whether other contiguous landowners are also willing to participate in the strategic employment development if allocated. As GAL has previously explained, the proposed allocation should not be made until this exercise has been completed; certainly it should not be made in the



LONDON GATWICK



- form that is now proposed, which deletes the requirement to justify industrial floorspace beyond the 17.93ha figure (MM16).
- 1.1.8. Whilst there may be demand for large-scale industrial and logistics uses across London and the South-East, it is not clear that this aligns with local need as identified in the Local Plan and its evidence base. Thus far there is no evidence to demonstrate that any potential end users of the Gatwick Green allocation would have a functional link to Gatwick Airport, Crawley or even the wider county within which it would sit.
- 1.1.9. The evidence prepared by Savills on behalf of Gatwick Green Ltd (GGL) ([REP-008-001](#)) shows in Appendix 4 on the final page that of the six live-occupier requirements, one is a UK-wide search, two are to serve regional needs and two are for south London. Only one could be considered local and that is for only 100,000sqft, which would require approximately 2.3ha (equating to the same quantum of floorspace as is available at The Base).
- 1.1.10. This raises a series of points, each of which indicates that the proposed deletion of the “second part of criterion a” is inappropriate (MM16):
- It is evident that Gatwick Green will not be meeting local need – it is a strategic allocation to capture footloose regional and even national investment. This needs to be balanced against the potential impact on Gatwick Airport, the key driver of the Crawley economy;
 - To the extent that there is local need it is for smaller units that could be accommodated on other sites or in different configurations to the east of Balcombe Road;
 - Even if larger scale units were “need” (rather than market interest) they could be accommodated in a configuration that was more sensitive to the safeguarded land so as not to sterilise the land parcels around the proposed Gatwick Green allocation, thereby preventing the effective and efficient use of land within the Borough.
- 1.1.11. Turning to MM17, the Wilky Group evidence indicates the first phase of Gatwick Green could be completed in 2026 (paragraph 3.19 of [REP-008-001](#)), and that the Employment Land Trajectory is soundly based with regard to the delivery programme for Gatwick Green i.e. 2025-2035. According to the site promoter, a hybrid planning application would be submitted early in the Plan period.
- 1.1.12. Crawley’s [Employment Land Trajectory \(Base Date 31 March 2023\)](#) (PS/EGSM/EG/17) identifies an available employment land supply pipeline for industrial and storage & distribution land of 4.97ha and a requirement for a further 17.93ha of new land for B8 uses. This is a total of 22.9ha over 17 years or 1.3ha per year.
- 1.1.13. The ELT changed just before Christmas because a site had come forward for delivery ([The Base](#)). As discussed above at paragraph 1.1.2, that site is available to meet demand in the early years of the plan and that site (at 4.2ha) combined with the 4.97ha remaining



LONDON GATWICK



in the ELT means Crawley has around seven years of supply. The 4.2ha at The Base alone is three years of supply.

- 1.1.14. There is therefore no case for modification MM17 which brings forward the completion date or deletion of the text in paragraph 9.58 saying the allocation will meet needs in the later part of the plan period. If anything, this text should be strengthened to require significant further work to understand the transport and master planning implications for the whole 44ha site before anything comes forward on land safeguarded for airport expansion.
- 1.1.15. We therefore recommend the reinstatement of the second part of criterion (a) in Policy EC4 (MM16) and the proposed main modifications to paragraph 9.58 of the supporting text are not accepted (MM17) as the proposed 2035 completion date is not effective, realistic or achievable.

1.2. Transport Modelling

- 1.2.1. The [Examining Inspectors' Post Hearings Advice letter dated 31 January 2024](#) ("Post Hearing Letter") states at paragraph 20 that:
- "We understand that transport implications have been assessed on permutations of floorspace figures depending on the transport intensity of end-users. We do not consider that further transport modelling would be required for plan soundness in light of our recommended modification to criterion (a)".*
- 1.2.2. The proposed main modification to criterion (a) (at MM16) removes the requirement to demonstrate through appropriate evidence the justification for any further industrial floorspace beyond 17.93ha. As a result, any development over and above the assessed 17.93ha would not be subject to any objectively assessed evidence justifying the need for such development either in economic or transport terms. The deletion of this requirement would reinforce the need for there to be a more detailed investigation of the transport implications based upon the mix of floorspace type being brought forward. It is consequently proposed that of the second part of criterion (a) in Policy EC4 proposed to be deleted (at MM16) should in fact be reinstated.
- 1.2.3. We strongly disagree with the statement at paragraph 20 of the Post Hearing Letter. At the Hearing on 23 November 2023 (at around 1.03pm) David Forsdick KC (on behalf of CBC) acknowledged that there had not been a Traffic Impact Analysis (TIA) above the trip budget and that any release beyond 13ha needs to be subject to the trip budget or to a further TIA.
- 1.2.4. The transport implications of the 44ha allocation (a threefold increase in the quantum of the allocation) have consequently not been modelled and in the absence of that assessment it is inappropriate to make the full allocation. GAL consider that this also



LONDON GATWICK



provides a string indication why the second part of criterion a) of EC4 should not be deleted (MM16).

- 1.2.5. GAL consider that the proposed modification MM16 makes the plan unsound in the absence of this modelling. GAL considers that a detailed, publicly facing master planning exercise should be carried out in advance of any planning application to ensure the proposed allocation is not developed in a piecemeal fashion and its full impacts are known. The policy is permissive and given the level of uncertainty GAL considers that it should be recast so that it restricts the delivery of any employment floorspace above the modelled trip budget unless it is demonstrated through objective evidence that the transport implications are acceptable to key stakeholders. GAL consider that this objective evidence should be provided before the adoption of the Local Plan.
- 1.2.6. Consequential on the larger site allocation, it is essential that the transport implications are addressed at the masterplanning stage. Criterion C needs to be amended to make clear that it is required in advance of a planning application (GAL amendments in blue bold text).
- 1.2.7. *c. Demonstrate through a Transport Assessment **for the whole site at the master planning stage** that appropriate access can be provided to the site having regard to both employee and operational movements. This must demonstrate that there will be no severe residual impact on the local and strategic road network, taking into account the operation of Gatwick Airport as nationally significant infrastructure, the allocated Horley Strategic Business Park, and the impact of committed developments in the borough and surrounding areas.*

1.3. The Unconsidered Consequences of the Strategic Employment Allocation

- 1.3.1. We set out at Appendix 1 hereto a restatement of the policy basis for Airport Masterplans as we consider this context to be essential for understanding GAL's continued concern regarding the proposed Main Modifications. GAL object to the proposed main modifications identified below as it is considered that the impact of these changes will further frustrate the implementation of the airport masterplan not only in relation to car parking, but also in relation to access to the airport car parking and the linkage between that car parking and the airport terminals.

a) Impact on Future Airport Access

- 1.3.2. The Post Hearing Letter makes reference at paragraph 11 to the land east of Balcombe Road being shown in the Gatwick Airport 2019 Masterplan (EGSM/GA/06) predominantly for surface car parking, but also highways infrastructure. The Gatwick Airport 2019 Masterplan shows the proposal for the southern wide-spaced runway development and how the proposed replacement and new airport parking to serve the development will be



LONDON GATWICK



- accessed (see Gatwick Airport 2019 Masterplan Plan 22 'Surface Access' at **Figure 1.3 of Appendix 2** hereto).
- 1.3.3. The proposed allocation of Gatwick Green conflicts with the proposed access in the Gatwick Airport 2019 Masterplan (EGSM/GA/06) as it sits astride the intended access link from the national highway network and the link between the proposed car park and the terminals (including the new third terminal) on land that falls wholly within the airport boundary in the southern wide-spaced runway scenario.
 - 1.3.4. By severing the main access between the airport terminals and the parking area GAL would need to reconfigure access to avoid routing traffic on to the A23. This would require more highway infrastructure and less land for car parking.
 - 1.3.5. In order to provide adequate accessibility to the fractured Gatwick masterplan site for car parking additional routes would be required, which could involve a change to the proposed alignment of the A23 to accommodate movements safely and avoid airport parking traffic from using the A23.
 - 1.3.6. Indicative layouts for either relocating the A23 from its proposed alignment, or for providing additional airport access roads to serve the remaining car parking zones shows that more of the safeguarded land would be unavailable for car parking except where no structures are required (i.e. surface parking).
 - 1.3.7. Changes to the access arrangements that would be required to accommodate the Gatwick Green development would reduce accessibility to the airport from the A23 and connectivity between M23 Jn 9 and the A23 serving Manor Royal and North Crawley. This would remove significant benefits of the Gatwick Airport Masterplan 2019 such as traffic relief on A2011 Crawley Avenue. The Gatwick Green development is also likely to have to use the public road network for shuttle buses to access the airport. This may result in more of the safeguarded land being unavailable for car parking except where no structures are required (i.e. surface parking).
 - 1.3.8. **Appendix 2: Surface Transport Figures** shows the indicative Gatwick Green access alignment as presented in the previous representations by GGL (see **Figure 1.1 of Appendix 2**).
 - 1.3.9. **Figure 1.2 of Appendix 2** shows the conflict arising between the proposed indicative road layout prepared by GGL and the Gatwick Airport masterplan for the southern runway, in particular the way in which the Gatwick Green access would preclude the southern runway access coming forward in future as shown in the masterplan.
 - 1.3.10. GAL wish to draw your attention to **Figure 1.3 of Appendix 2** which is an extract of Plan 22 taken from the Gatwick Airport Masterplan 2019 (EGSM/GA/06). This plan clearly demonstrates that the highways access in this location is complex and that the on-airport access roads would diverge under the M23, in part due to level changes and other constraints. The purpose of the proposed access as shown in **Figure 1.3** was to avoid interaction and impact on or from airport related traffic on the local road network by



LONDON GATWICK



- creating highways access to serve airport development. At present, the Gatwick Green indicative access would frustrate GAL's ability to bring forward the masterplan for the southern runway as the access configuration to the east of Balcombe Road could not be implemented.
- 1.3.11. GAL consider that it is essential that policy EC4 ensures that the airport masterplan proposals for access are taken into account in the development of the masterplan for Gatwick Green and the assessment of the transport implications thereof.
- 1.3.12. Criterion (d) therefore needs further modification to ensure the preparation of both the master plan and Mobility Strategy takes into account and does not undermine the Airport Masterplan provisions for access to the airport in connection with the Southern Runway proposals. Furthermore, that the Gatwick Green layout will need to reserve a potential alternative access route to Balcombe Road for when that road is re-routed to run to the east and north of the Gatwick Green allocation. GAL's suggested modifications are in blue bold text below:
- 1.3.13. *d. Demonstrate through a comprehensive Mobility Strategy how the development will achieve the master plan-level vision for the development as regards movement, including through ~~include~~ measures and improvements to that maximise sustainable access to the site, ~~focusing on how the development will~~ and optimise the ~~usage~~ of sustainable modes of transport as opposed to the private vehicle. ~~The Mobility Strategy will~~ **and detailing detail** infrastructure improvements that will be required to adequately mitigate the development impacts on the highways network, ~~detailed~~ **and set out** how these improvements will be delivered and operated. **The Mobility Strategy will be prepared in consultation with Gatwick Airport and National Highways to demonstrate how it will work alongside the highways improvements required for the expansion of the airport as shown in the Gatwick Airport 2019 Masterplan.** HGV traffic will not be allowed to enter Gatwick Green from the north on Balcombe Road, and will not be allowed to egress the site via a right turn onto Balcombe Road.*
- 1.3.14. We also consider the development of the masterplan and the Mobility Strategy should be a public facing process undertaken with appropriate oversight and scrutiny from stakeholders, interested parties and the community to ensure that it is developed. GAL therefore consider that the final paragraph of Policy EC4 should be absorbed into an additional, standalone criterion that provides for such a mechanism for public engagement during the development of any masterplan for the Gatwick Green site. GAL's suggested modification is in blue bold text below and GAL's suggested deletions are in red bold strikethrough:
- 1.3.15. Add New Criterion: *The development of the **Gatwick Green** site will be in accordance with an agreed master plan **setting out the key development, mobility strategy, design and delivery principles including landscape and visual impact, and engagement with statutory consultees, stakeholders, and other interested parties.** The master plan shall be produced by the site promoter in consultation with the council **and other parties***



LONDON GATWICK



to ensure comprehensive development in line with the above requirements. The master plan shall be approved by the Council's Planning Committee prior to its submission ~~will be submitted~~ at the outline planning application stage to assist the consideration of subsequent planning application(s) and must include phasing, programming of infrastructure and details on quantum of development and appropriate uses. The approved master plan will be taken into account as an important material consideration in the determination of any planning applications.

- 1.3.16. Alternatively, the final paragraph of Policy EC4 could remain in situ with the suggested wording above added. However, GAL consider that the significance of the master plan process requires its own criterion to demonstrate the necessity of stakeholder engagement during this process.

b) Impact on the efficient layout of the remaining land

- 1.3.17. The remaining land safeguarded for airport expansion to the east of Balcombe Road will be divorced from Gatwick Airport. It has not been demonstrated that the shape of the allocated Gatwick Green site is the most suitable land to meet the strategic employment land allocation objectives whilst minimising the impact on the retained safeguarded land for the southern runway expansion of Gatwick Airport.
- 1.3.18. The irregular shape of the Gatwick Green allocation sterilises parcels of land both north and south of Fernhill Road and the remaining land north of Antlands Road will provide an inefficient layout for car parking. This is shown in **Figure 1.4 of Appendix 2**.
- 1.3.19. The retained land safeguarded is divorced from Gatwick Airport and is awkwardly shaped to accommodate the required car parking in a logical layout which aids access for visitors and enables the shuttle bus service to operate efficiently. The distance from the airport will also increase travel times and place reliance on shuttle buses that may need to travel along local highway routes.
- 1.3.20. As it has previously explained, GAL considers that the most appropriate location and shape of any strategic employment location to the east of Balcombe Road ought to have been considered more carefully before any land is allocated. If that is not to be the case, then the Gatwick Green master planning exercise should ensure that the negative impacts identified above are avoided / mitigated as far as possible.
- 1.3.21. These matters should consequently be addressed in the masterplan and so the final paragraph of Policy EC4 (MM16) needs to be expanded to encompass these issues (as described in paragraphs 1.3.13 to 1.3.15 above). The master planning process should be a public process open to all stakeholders, including GAL, to ensure that the solution selected addresses all issues relating to the proposed development.

c) The Consequent need for multi-storey airport parking

- 1.3.22. The evidence before the Examination indicated the quantum of parking to accommodate the airport's southern runway expansion could only be achieved with substantial multi-



LONDON GATWICK



storey provision. A consequence of the proposed main modification to EC4 (MM16) to allow a greater area of the Gatwick Green allocation to be developed implies a recognition that the nature and scale of such development to facilitate the expansion of Gatwick Airport for a southern runway will need to be greater; this increased scale is acceptable and therefore GAL's contention is that this should be reflected in a modification to the supporting text to Policy GAT2.

- 1.3.23. The supporting text should include an acknowledgement that in using land safeguarded for expansion of Gatwick Airport to enable the Gatwick Green site allocation to come forward, there would be a consequent need for decked or multi-storey car parking (between 18 to 27 metres in height equating to up to 7 storeys) to be provided on the residual safeguarded land around Gatwick Green to serve the airport and indicate an in-principal acceptance of such solutions.
- 1.3.24. This could be achieved through an addition to the supporting text to Policy GAT2 at paragraph 10.21 to make clear that it is envisaged and accepted there will need to be substantial development of stacked car parking (7 storeys) to provide the necessary parking numbers. Suggested modifications to paragraph 10.21 of Policy GAT2 are shown below (GAL's modifications are in blue bold text):

*"10.21 The Gatwick Airport Master Plan requests that local planning authorities use the revised safeguarding boundary shown in the Master Plan. The council has considered the Airport Layout: Additional Runway shown in Plan 20 of the Master Plan and has included within the Local Plan safeguarded boundary land that would be required to accommodate a southern runway, including the diversion of the A23. However, the Local Plan safeguarded boundary has not included all the land east of the Balcombe Road which is shown in the Master Plan as being utilised for a large area of surface car parking. Given the constrained land supply within the borough and its significant employment and housing needs, the council does not consider surface parking to represent an efficient use of land. The Airport is already accommodating parking more efficiently through decked and robotic parking, and its Surface Access Strategy seeks to reduce access to the airport by car. **The Council considers that block and multi-storey car parking in the residual land outside of the Gatwick Green allocation would be acceptable to facilitate any future airport expansion.** This area excluded from safeguarding is essential to meet Crawley's employment floorspace needs and is allocated in Policy EC1 as a Strategic Employment Location."*

- 1.3.25. Notwithstanding this suggestion, GAL has significant concerns regarding the case made during the examination by GGL and CBC that an on-airport parking offer made up almost entirely of block parking housed in multi-storey car parks can be achieved. GAL consider this is misplaced and is not evidenced by existing or planned provision in any UK or comparable international airport. Except for a single car park recently introduced at Manchester Airport there is no evidence of this being a standard model for future airports. There is no evidence of an airport operator adopting a model overwhelmingly limited to this type of operation, which would introduce operational and commercial constraints.



LONDON GATWICK



e) The Visual Impact Implications of the Allocation

- 1.3.26. The proposed EC4 allocation is in conflict with Policy CL8: Development Outside the Built-Up Area.
- 1.3.27. The policy describes North East Crawley High Woodland Fringes (which include the proposed Gatwick Green allocation) as having an important role in maintaining the separation of the distinct identities of Gatwick Airport, Crawley and Horley. The Gatwick Green allocation will create visual intrusion and is incompatible with the area's role in maintaining the separation of Gatwick Airport, Crawley and Horley.
- 1.3.28. Policy EC4 does not presently explain how this inherent conflict will be addressed. The masterplan for Gatwick Green needs to ensure that the objectives of Policy CL8 are taken into account.
- 1.3.29. No account in either CBC or GGL's assessment of available land is made for landscaping, supporting infrastructure and access. This is a fatal flaw in their assessment of what could be reasonably masterplanned in the remaining safeguarded area and undermines the case that Gatwick Green can be allocated at the full 44ha without due regard to the safeguarding or the Airport Masterplan. GAL consider that an acknowledgement should be made in Policy CL8 of the conflict arising by modifying the section relating to North East Crawley High Woodland Fringes. GAL's suggested modification is set out in blue bold text below:
- 1.3.30. *Fringes Proposals which do not create, or are able to adequately mitigate, visual/noise intrusion are generally supported. **Recognition will be given to the need for Gatwick Green and the expansion of Gatwick Airport for its southern runway to be developed at scale in the determination of planning applications.** This area has an important role in maintaining the separation of the distinct identities of Gatwick Airport, Crawley and Horley.*

1.4. Policy EC2 Clarification

- 1.4.1. The policy refers to a total of 11 Main Employment Areas (MEA), 4 of which are subject to site specific policies, the others being categorised as 'other' Main Employment Areas. The final paragraph refers to the 7 MEAs 'listed above' however this is inaccurate as there are 11 MEAs listed, including the four MEAs set out in the text in the second paragraph. The proposed wording consequently introduces an unnecessary degree of ambiguity into the policy.
- 1.4.2. It is recommended that this ambiguity be resolved by amending the main modification (MM15) in the first line of the last paragraph to refer to 'seven other' main employment areas (refer to text in blue bold below).



LONDON GATWICK



*“Employment generating development will be supported in the **seven other Main Employment Areas listed above** where it makes for an efficient use of land or buildings and contributes positively to sustainable economic growth and the overall economic function of Crawley.”*

1.5. Airport Boundary

- 1.5.1. GAL’s position remains that the Airport Boundary as shown on the Policy Map (CBLP/M/01) should accord with that shown on Plan 21 of the Gatwick Airport Masterplan 2019 (EGSM/GA/06). By suggesting that the airport boundary for Gatwick Airport is anything other than the one GAL recognises in its own Masterplan risks causing confusion for future decision makers, statutory consultees and other interested parties.

1.6. Aerodrome Safeguarding (Additional Modification)

- 1.6.1. We note the further proposed change to Policy C4 in the Schedule of Additional Modifications and consider the amendment could be further improved for the purposes of clarity.
- 1.6.2. Policy EC4 criterion (q) should additionally make reference to the green and blue infrastructure, including proposed surface water drainage proposals, should be designed in accordance with Aerodrome Safeguarding requirements to ensure that the bird strike risk to Gatwick Airport is not increased and the safety of the airport is not compromised.



LONDON GATWICK



APPENDIX 1

1. Policy GAT2 Safeguarded Land

1.1. Airport Masterplan Plan

- 1.1.1. [Appendix 2](#) to GAL's response to the Phase 1 MIQs (REP-056-001B) was an overview of relevant policy, guidance and documents relating to safeguarding land at Gatwick Airport for a new runway.
- 1.1.2. Paragraphs 12.7 and 12.8 of the 2003 Air Transport White Paper state that airport operators are recommended to maintain a master plan document detailing development proposals. It is clear in stating that an airport master plan does not have development plan status, but the level of detail contained within it is essential to inform the content of the Local Development Framework. Paragraph 5.11 of this documents makes it clear that all proposals for airport development must be accompanied by clear surface access proposals which demonstrate how the airport will ensure easy and reliable access for passengers, increase the use of public transport by passengers to access the airport, and minimise congestion and other local impacts.
- 1.1.3. The 2004 DfT document 'Guidance on the Preparation of Airport Masterplans' builds on the importance of airport masterplans and their contribution to Local Plan making by stating in paragraph 7, that the purpose of airport master plans is to provide a mechanism for airport operators to explain how they propose to take forward airport-specific proposals and that they are designed to help inform the regional and local planning processes and facilitate engagement with a wide range of stakeholders. Paragraph 8 of the same document states that Government envisages that a master plan should provide a clear statement of intent on the part of an airport operator that will enable future development of the airport to be given due consideration in local and regional planning processes. Paragraph 37 of the same document recognises that surface access needs to be carefully planned as part of an integrated approach to the development of an airport and that future surface access needs is an important part of airport master plan preparations.
- 1.1.4. In the Government's 2018 Consultation on its Aviation Strategy 'Aviation 2050: The Future of UK Aviation' it stated (paragraph 3.66) it recognised that several airports safeguard land for future development to enable growth and that it is the Government's position that it is prudent to continue with a safeguarding policy to maintain a supply of land for future national requirements and to ensure that inappropriate developments do not hinder sustainable aviation growth. The Government's recently published Aviation Strategy for the UK 'Flightpath to the Future' (May 2022) does not state that safeguarding land at Gatwick Airport is no longer required.
- 1.1.5. The NPPF (December 2023) at paragraph 110(c) and (e) makes it clear that in promoting sustainable transport that planning policies should:



LONDON GATWICK



“c) identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development; and

e) provide for any large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements.”

- 1.1.6. The test for protection in the Aviation Policy Framework is a low bar – ‘that maybe required’. The fact the land is identified within an Airport Masterplan is consequently, of itself, ‘robust evidence’ in terms of the NPPF. The Aviation Strategy explicitly acknowledges the proposed use of the land maybe for ‘airport infrastructure’ which encompasses a broad range of uses, including highways infrastructure and car parking. The Aviation Strategy does not distinguish between different types of airport infrastructure.
- 1.1.7. The 2019 Gatwick Airport Masterplan (EGSM/GA/06) sets out GAL’s proposals for airport development along with clear surface access proposals. It is the mechanism for GAL to explain how it proposes to take forward airport-specific proposals and it is a document that should inform the Local Plan making process. In terms of the NPPF and paragraph 110, it is the robust evidence which identifies the land that GAL critically requires for large-scale development to support its expansion and thereby its contribution to the wider economy. These arrangements are frustrated by the Gatwick Green allocation.
- 1.1.8. During the January 2024 hearings, the Inspectors queried whether safeguarding exists at other UK airports. While geographical contexts differ, there are examples of land being safeguarded for airport expansion and of local plans taking a lead from the relevant airport’s masterplan when developing local plan policies to safeguard the airport’s ability to grow and development to meet future air traffic demand.
- 1.1.9. The table at **Schedule 1** hereto provides a summary of safeguarding in place around airports in England. This includes the policy specific to the airport as set out in the host authority’s adopted local plan, relevant extracts from the Planning Inspectorates’ report on the examination of that respective local plan and a link and commentary on the relevant airport’s own masterplan upon which the local planning policy is based. This demonstrates that land is routinely identified for airport expansion in Airport Masterplans that are in turn translated into Local Plans. These take the form of either Green Belt release or policy allocations for airport expansion (with or without compulsory acquisition). In all cases, the significance of airports as nationally significant infrastructure is recognised as is the need to safeguard land for their future expansion which goes hand in glove with prosperity of the local and regional economies.



LONDON GATWICK



SCHEDULE 1: SUMMARY OF LOCAL PLAN POLICIES RELATING TO AIRPORTS IN ENGLAND

	Local Plan Context	Inspectors Report Comments	Airport Masterplan
Newcastle Airport	<p>Northumberland Local Plan 2016-2036, adopted March 2022.</p> <p><i>Policy TRA 6 Newcastle International Airport</i> 1. In assessing development proposals, the Council will support the sustainable development of Newcastle International Airport, applying the Airport Master Plan in its present or future iterations.</p> <p>2. The important contribution of land within Northumberland to the functioning and growth of the Airport will be recognised through the allocation, for airport related uses, of around 25 hectares of land north of the County boundary. This land will accommodate possible growth for passenger or freight facilities and activities supplementary to the airport's operation, including necessary car parking expansion.</p> <p>Northumberland-Local-Plan-Adopted-March-2022.pdf</p>	<p>Northumberland Local Plan, Inspector's Report 26 January 2022</p> <p>Paragraph 277 of the Local Plan Inspector's Report states:</p> <p><i>Policy TRA 6 supports development at Newcastle International Airport and allocates around 25 ha of land north of the airport for future expansion and supplementary activities in accordance with the Airport Masterplan.</i></p> <p>Northumberland-Local-Plan-Report-Final-26-January-2022.pdf</p>	<p>The airport 2035 Masterplan safeguards 700m of land for a potential extension to its runway.</p> <p>The airport would build an extra 7,400 additional car parking to cope with future demand.</p> <p>2035 Masterplan (newcastleairport.com)</p>



LONDON GATWICK



<p>Birmingham International Airport</p>	<p>Solihull Metropolitan Local Plan 2013, adopted December 2013</p> <p>Policy P1 – Support Economic Success states: Birmingham Airport Birmingham Airport is the principal international gateway into the region and an important part of the national airports infrastructure. It is vitally important in the local and regional economy, attracting investment and supporting business growth and international trade in key sectors.</p> <p>The Council will support and encourage further development including the extension to the main runway south of the A45, in accordance with the approved planning application, and development needed for operational purposes such as passenger and freight facilities, terminals, transport facilities and other development that supports operational needs.</p> <p>The Council will also support a broad range of ancillary and complementary facilities including</p>	<p>Report on the Examination into the Solihull Local Plan Development Document, adopted November 2013</p> <p>Paragraph 35 advises:</p> <p><i>35. The policy also enables Birmingham Airport to grow in line with its Masterplan [SLP010], including the new runway alignment. However, since the prospect of a second runway is unlikely to arise within the current plan period, it would be premature to rule out this longer-term possibility, as some suggest, at this time.</i></p> <p>https://www.solihull.gov.uk/sites/default/files/migrated/Planning_LDF_SolihullLP.pdf</p>	<p>The Airport’s need for additional land relates to an anticipated shortage of aircraft parking stands along with other ancillary facilities. The process of acquiring the land, obtaining planning consent and commencing construction arises within the 15-year period of this Plan, albeit towards the end of our planning horizon. The Airport currently estimate that around 20-40 hectares (up to 11% of the current site) is required. The preferred location for 8 hectares is the current NEC West Car Park adjoining the Airport site (some of which is already used for Airport parking).</p> <p>The remaining 12-32 hectares is most likely to be required on land south of the A45 between the Elmdon side of the Airport and the Jaguar Land Rover factory or some similar nearby location. The Airport may need to invoke its compulsory purchase powers to acquire suitable land which is not already in its ownership.</p>



LONDON GATWICK



	<p>hotels, administrative offices car parks and other appropriate facilities needed to serve the needs of air travellers using the Airport. Proposals should be justified in terms of scale and in terms of supporting the Airport function and be appropriately located within the Airport so as not to detract from Airport function.</p> <p>https://www.solihull.gov.uk/sites/default/files/migrated/Planning_LDF_Local_Plan_Final.pdf</p>		<p>birmingham-airport-master-plan-2018-webres.pdf (birminghamairport.co.uk)</p>
Manchester Airport	<p>Policy JP-Strat10: Manchester Airport</p> <p>Due for adoption by the 9 councils in March 2024</p> <p>Lying within the area and policy framework covered by JP-Strat 9 this policy seeks to maximise the benefits of the continued operation and sustainable growth of Manchester Airport and its surrounding locality. Development which is in line with: • Government policy and • Manchester's local plan policies will be supported delivering a sustainable world class airport which will help to address issues raised by climate change. With high quality services and facilities, it will be the UK's principal international gateway outside</p>	<p>Greater Manchester Combined Authority, Places for Everyone Joint Development Plan Document, Inspectors' Report, February 2024</p> <p>117. Policy JP-Strat9 aims to protect and enhance the competitiveness of the southern areas. In this regard, it identifies Altrincham, Trafford's main town centre and Manchester Airport as being particularly important locations for investment. Notwithstanding the objective of prioritising the re-use of brownfield land, the policy also acknowledges the need to release land in the Green Belt</p> <p>121. The intention of policy JP-Strat10 is to seek to maximise the benefits of the continued operation and sustainable growth of Manchester Airport and the surrounding locality. The economic importance of the</p>	<p>The Airport Master Plan 2030 proposes a total of six extensions to the existing Operational Area which have been prioritised for the use of airfield, apron, maintenance, car parking and commercial/office facilities.</p> <p>Land to the north of Ringway Road (33ha) which is largely undeveloped with some residential has been identified for displaced Airport car parking because of operational uses which require direct access to the apron.</p> <p>AirportMasterplan.pdf</p>



LONDON GATWICK



	<p>London. The airport and its surrounding locality will make a major contribution to the competitiveness of the North, Midlands and Wales by supporting inward investment, international trade and tourism, high quality new homes and supporting our economic and social regeneration. It will be central to raising our global profile and economic performance.</p> <p>Microsoft Word - Adopted Plan FINAL V3.docx (greatermanchester-ca.gov.uk)</p>	<p>airport to the region is acknowledged. In supporting this growth, the policy identifies a range of existing schemes and projects. Other than the allocations, the Plan does not identify any new specific proposals for growth at the airport or surrounding area, including any specific targets for passenger numbers. 122. There is nothing unsound in the Plan establishing the principle of growth in this location. Any specific environmental implications of individual proposals relating to this growth would still need to be assessed against specific policies in the development plan. The policy would not override such considerations. It should also be noted that there is capacity for passenger growth at the airport without any additional development and thus, in some respects, the policy is merely reflecting the reality that growth in passenger numbers is likely with or without the Plan in place.</p> <p>PfE - Inspectors Report 01 - FINAL.docx (greatermanchester-ca.gov.uk)</p>	
--	--	---	--



LONDON GATWICK

POWERED BY VINCI AIRPORTS | GLOBAL INFRASTRUCTURE PARTNERS

<p>Liverpool John Lennon Airport</p>	<p>Liverpool Local Plan 2013 -2033, adopted January 2022</p> <p>Policy EC7 Liverpool John Lennon Airport</p> <p>7.76 To enable the sustainable growth of the Airport in line with national planning policy and guidance, and the provisions of the Airport Masterplan including forecasts, the operational area of the Airport needs to expand. To achieve this an area of farmland, known as the Oglet, which lies to the south of the runway and adjacent to the River Mersey has been removed from the Green Belt (as shown on the Policies Map).</p> <p>https://liverpool.gov.uk/media/1tkbedcv/01-liverpool-local-plan-main-document.pdf</p>	<p>Report on the Examination of the Liverpool Local Plan 2013-2033, December 2021</p> <p>139.As required by the Airports NPS, the airport produces and maintains a masterplan. The 2007 masterplan looked ahead to 2030 but the airport has now prepared, including public consultation, an updated 2018 masterplan to 2050 [CD22]. This sets out anticipated growth in passenger numbers as well as opportunities for other airport-related growth that would align with the vision and objectives to grow the LCR economy. The airport operates on a somewhat constrained site between existing housing and commercial development at Speke, nationally important heritage assets at Speke Hall and the Mersey estuary, with its protected Ramsar, SPA and component SSSI habitats, almost immediately to the west. Land between the current airport perimeter and the Mersey is Green Belt.</p> <p>178.Counterbalancing these harms, I find that the unique growth potential of the airport in combination with the identified economic and employment benefits for Liverpool and the wider city region would be significant..... Overall, the wider public benefits arising from the economic potential of Policy EC7 are to be given substantial weight. I also attach limited weight to the environmental benefits of the airport proposals</p>	<p>Liverpool John Lennon Airport Master Plan to 2050, published March 2018</p> <p>The Airport’s Master Plan proposes to increase the length of the runway to ensure LJLA can facilitate the long haul routes that will enhance global connections, supporting the visitor economy and international trade.</p> <p>https://www.liverpoolairport.com/media/2957/liverpool-john-lennon-airport-master-plan-to-2050.pdf</p>
--------------------------------------	---	---	---



LONDON GATWICK



		<p>being sustainably located and the emphasis on securing modal shift for employees and passengers travelling to the airport.</p> <p>181. Consequently, and drawing all of the above together, I find the substantial cumulative benefits that would materialise from the Plan's proposals for the airport at Policy EC7, the general absence of specific and significant environmental harm and the limited contribution of the land south of the runway to the purposes of Green Belt and the limited impact on those purposes, would amount to exceptional circumstances necessary to justify the alteration to Green Belt proposed at the Oglet. 182. It has also been adequately demonstrated at a strategic level, proportionate to plan-making, that potential environmental impacts have been appropriately considered to a level that shows, in principle, the policy would provide an appropriate framework to assess detailed proposals. Further work would be needed to accompany particular proposals to assess fully the various environmental impacts and provide detail on potential mitigation. Ultimately, Policy EC7 on proposed expansion at LJLA would be effective, justified, and consistent with national policy and, subject to a detailed modification in relation to the ASAS, therefore sound.</p>	
--	--	--	--



LONDON GATWICK



		https://liverpool.gov.uk/media/wgae4hp0/liverpool-final-report.pdf	
--	--	---	--

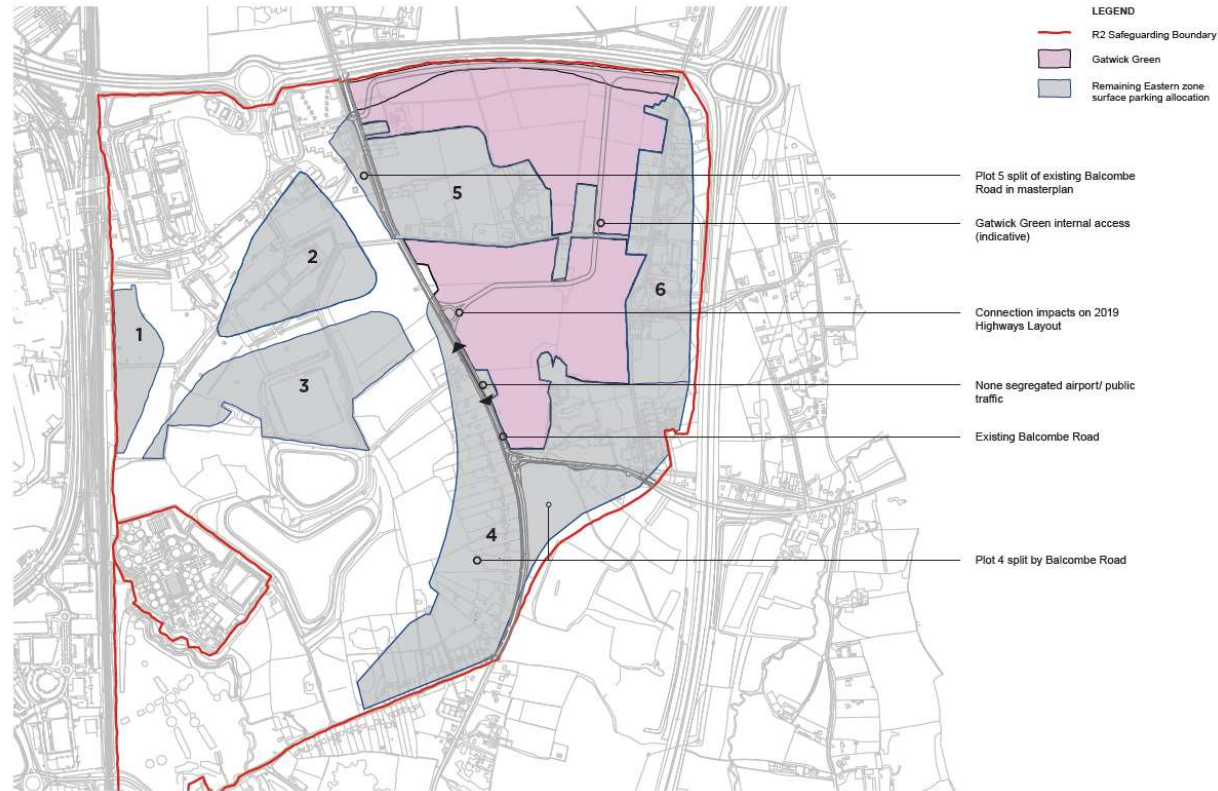


LONDON GATWICK



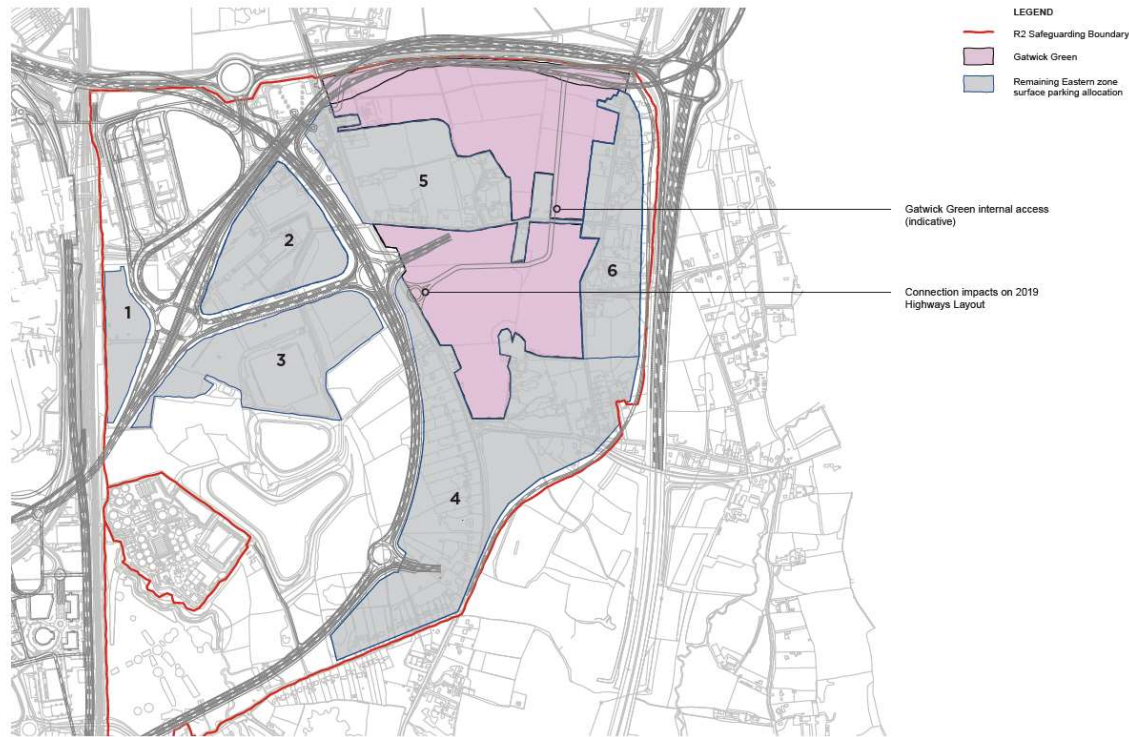
APPENDIX 2: SURFACE ACCESS FIGURES

Figure 1.1 Gatwick Green Masterplan Indicative Access



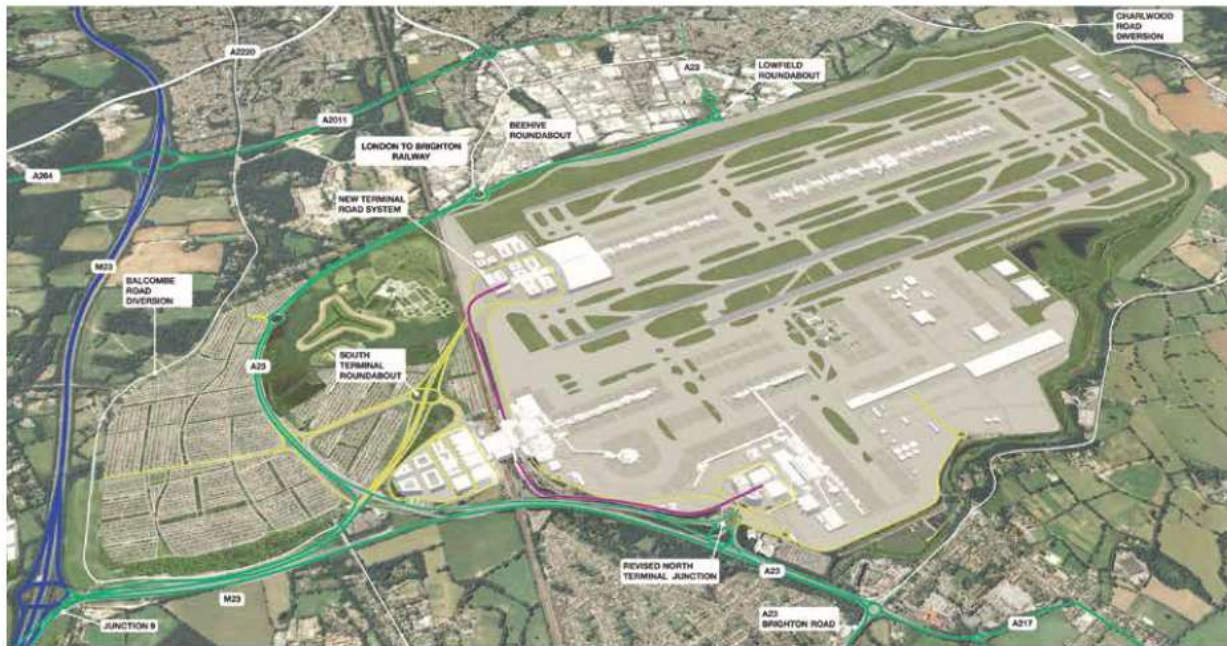
CHAPMAN TAYLOR

Figure 1.2: Gatwick Green Indicative Access and Gatwick Airport Masterplan Access Overlaid



CHAPMAN TAYLOR

Figure 1.3: Gatwick Airport Masterplan 2019 Plan 22



- LEGEND**
- Motorway M23
 - Main roads
 - On Airport Roads
 - Terminal Shuttle



Figure 1.4: Access Implications for the Gatwick Southern Runway Masterplan

