

Tim Norwood

Director of Corporate Affairs, Planning &
Sustainability
Gatwick Airport Ltd

By email only: feedback@gatwickfutureplans.com

27 July 2022

Dear Mr Norwood

Horsham District Council's Response to the Gatwick NRP Summer 2022 Consultation

Thank you for the opportunity to comment on the Gatwick Airport Ltd (GAL) Northern Runway Project (NRP).

We understand that this further Summer 2022 Consultation is intended to gather feedback on design changes to the proposed highway improvements but also includes updates on other elements of the Project.

Of course, as GAL will recall, Horsham District Council submitted a detailed response to the Statutory Consultation that was held in autumn between 9 September and 1 December 2021. This remains the substantive response of the Council, to date, on the Northern Runway Project proposals and any comments contained within this response should be viewed in combination with our principal response. All the issues raised in the Council's previous response remain and will need to be addressed by GAL as part of its preparation of the DCO application.

Highways Improvements

The highways improvement changes contained within the Consultation Document set out revised proposals in sections, starting at the eastern end close to the M23 junction 9 and finishing at Longbridge roundabout on the A23. The land required for the highways improvement changes has also changed since the Autumn 2021 Consultation.

None of the mitigation discussed in the Summer 2022 Consultation Document is contained within Horsham District. However, it is noted that a significant amount of additional capacity is being created with extra lanes, through road widening schemes and new flyovers, amongst other interventions. Whilst these proposals are designed to mitigate the traffic impacts immediately around the Airport, it is not clear at this stage what consideration has been given to mitigation beyond its immediate vicinity. Clearly GAL anticipates a significant increase in

.../

traffic volumes accessing the Airport to justify such significant road improvements and it is therefore logical to conclude that adverse impacts may be experienced beyond the immediate locality into adjoining local authority areas, such as Horsham District, including key connecting routes and more rural roads.

Paragraph 2.1.3 of the Summer 2022 Consultation document states that “...*much of the Project is focused on airport activity, the highway improvements have a direct relationship to non-airport traffic, **with our proposals taking account of travel to, from and between local communities.***”

It is unclear in what way GAL considers that this has been achieved for communities beyond those of the immediate Crawley and Horley areas. As the Council raised in our response to the Autumn 2021 Statutory Consultation, we are very concerned that the cumulative impacts of the NRP along with other planned growth in the area will be significantly under-represented with the current approach. Residents of Horsham District work at the Airport, in addition to user traffic, both of which would be expected to increase as a consequence of expansion.

The National Trip End Model (NTEM) is used for the Core Modelling to represent all planned growth, with the exception of developments that are classed as “Reasonably Foreseeable” to come forward. As we highlighted in our principal consultation response, this is misaligned with how the transport modelling and analysis have been undertaken in Horsham and Crawley in respect of emerging Local Plans; Horsham District Council and Crawley Borough Council have used specific growth quanta for development within their areas considered likely to come forward through the Local Plan process, even despite there being some degree of uncertainty up until when the Local Plans are adopted. The Council’s own Transport Model and the assumptions which sit beside it have been made available to developers (for a fee) and this may be something that GAL would also like to have access to, to support its own Transport Modelling work.

The Council understands that additional sensitivity testing will be undertaken for sites such as West of Ifield, which is a site promoted by Homes England for potential allocation in the Council’s emerging Horsham District Local Plan. There, are, of course, other sites which are under consideration and which GAL should incorporate into the assessments. At this stage, it is unclear whether the findings of the sensitivity testing will be shared with interested parties to be able to meaningfully comment on the results. The transport modelling can only be robust if it properly assesses the cumulative impact and takes account of future strategic sites. In the absence of sufficient information from GAL to date for the Council to understand the potential traffic and transport impacts of the NRP on the District, we remain of the view that mitigation of impacts for Horsham District will be required.

Car Parking Provision

Principle of New On-Airport Parking

.../

Paragraph 3.2.9 explains that the Development Consent Order (DCO) is seeking permission for additional provision of up to 12,025 spaces, of which 7,780 would replace spaces that would be permanently lost where existing parking areas are changed to accommodate alternative uses. GAL explains this translates to a net increase of 4,245 spaces to cater for passenger growth.

The Council welcomes clarification as to the number of new car parking spaces proposed through the DCO, as this number has varied during discussions with the Local Authorities, for example there appears to be discrepancy in the figures between information provided for the Planning A and Transport Topic Working Group meetings that have been held in recent months.

The Council considers that all locations within the airport boundary will remain the most sustainable places for airport parking. We reiterate that, in addition to being provided on-airport, any new airport parking provision must be justified by a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport. The Summer Consultation Document provides a high-level overview of parking need associated with DCO passenger growth, but there is a need for a detailed parking strategy that carefully considers and justifies the car parking requirements of the Northern Runway Project in the context of ambitious modal share targets for surface access. Currently, the parking proposals lack any robust justification for the number of spaces. In justifying the level of parking spaces GAL will also need to carefully demonstrate how modal share aspirations will be achieved.

Ensuring 'sufficient but no more than necessary' Parking Provision

Paragraph 3.2.10 invites views as to whether GAL should include, within its parking proposals, an additional 3,300 spaces, which could be used to replace off-airport unauthorised spaces that may be lost following Local Authority enforcement action. The Council has carefully considered this issue and is of the view that additional on-airport provision is not required to offset the loss of any unauthorised spaces.

The Council works hard to resist unauthorised off-airport parking and takes enforcement action where necessary, however, there is no guarantee that the Council, or indeed our neighbouring local planning authorities, will be able to prevent new unauthorised schemes from arising.

More broadly, the Council has had regard to the 2019 Annual Parking Survey undertaken by the Gatwick Local Authorities, this being the most recent pre-pandemic survey. At the time, this identified 16,508 vacant authorised spaces in total (12,070 spaces on-airport and 4,438 authorised spaces off-airport) and 6,644 unauthorised spaces. Therefore, even if (theoretically) all unauthorised spaces were to be enforced against, there would be sufficient authorised capacity on-airport (and indeed off-airport) to offset these losses.

.../

On this basis, there is concern that providing 3,300 further new spaces on-airport, predicated on the (in our view) risky assumption that enforcement action against unauthorised off-airport operations can be permanently resisted, is likely to result in an over-provision on-airport. This would be contrary to the 'sufficient but no more than necessary' requirement (Obligation 5.6.1) of the Airport's S106 legal agreement with West Sussex County Council and Crawley Borough Council (in consultation with the other Local Authorities).

Whilst it is appreciated that total parking demand is likely to grow due to the DCO, it is considered that GAL should be seeking to provide parking based on the passenger growth numbers associated with the DCO, within the context of its sustainable mode share surface access obligations. The Parking Strategy, in the context of the sustainable transport strategy, should demonstrate the number of spaces required to support growth associated with the DCO, and show that Gatwick, together with existing authorised off-airport parking can meet these parking needs.

The Council is of the view that the provision of car parking at the airport to meet future demand will need to be carefully monitored and, as part of the Development Consent Order, an appropriate mechanism should be attached to the application to ensure that GAL provides parking only as and when it is required, enabling it to be managed in line with the requirements of the S106 legal agreement.

Whilst it is appreciated that an element of flexibility is required by both GAL and the Local Authorities to ensure 'sufficient but no more' parking provision, GAL's wide-ranging permitted development rights provide significant scope for new parking to come forward on-airport without the need for planning permission. The principle of waiving or capping GAL's parking-related permitted development rights as part of a DCO related S106 was suggested at the Planning A TWG, and we welcome GAL's willingness to discuss options, with possible mechanisms including a 'requirement' on the DCO or an obligation within the S106 legal agreement. We note that in this event, GAL would retain the option to apply for planning permission, thus enabling any new parking proposals to be assessed in light of a demonstrable need and within the context of the sustainable surface access strategy.

As detailed in paragraph 3.2.6 of the Consultation Document, some car parks would be temporarily lost during construction and reinstated later in the works schedule. As with an appropriate DCO requirement to control the provision of parking only when it is needed, it is also considered that there exists a need to manage the phasing of car parking over the construction period of the Project.

Parking Enforcement

Defining the appropriate balance of future car parking provision that seeks to provide sufficient authorised car parking for future demand, but also encourages increased levels of sustainable travel movements is challenging.

.../

Whilst the Council does not agree, for the above reasons, that GAL should be re-providing on-airport for any unauthorised off-airport spaces lost due to Local Authority enforcement action, we recognise the ongoing need to investigate planning breaches where unauthorised off-airport parking is in operation and will take enforcement action accordingly.

Enforcement action against unauthorised operators is a resource-intensive, time consuming, and frequently protracted process. The councils have achieved, often with GAL's support at Inquiry, successful results against unauthorised parking operators. But this is a constantly evolving challenge, where new unauthorised sites will frequently 'pop-up' in the districts and boroughs around Gatwick Airport. Each new breach necessitates investigation and often enforcement action, so continuing the cat-and-mouse battle between Local Authorities and the operators of unauthorised parking.

The continued operation of unauthorised airport parking in off-airport locations undermines both GAL's ability to achieve its sustainable transport mode share obligations, and more broadly the principles of sustainable development underpinning the Planning system and Local Plan policies.

Given the ongoing nature of unauthorised off-airport parking, and the likelihood of growth through the DCO prompting further unauthorised 'pop-ups', the Local Authorities would be keen to explore with GAL whether there is scope through the DCO S106 agreement to seek an annual funding contribution from GAL towards a dedicated Planning Investigations/Enforcement Officer to be employed by the Local Authorities. We base this on the rationale that unauthorised off-airport parking undermines the ability of GAL to meet its S106 mode share obligations, particularly when the Airport is seeking to encourage greater public transport use. We therefore take the view that it is reasonable for GAL to support the councils in taking enforcement action, but that it is not reasonable for GAL to simply re-provide these spaces on-airport.

To be clear, the investigation and enforcement process would be independent of GAL, but the funding of a dedicated Local Authority resource would greatly assist the councils in taking enforcement action where merited, thereby supporting GAL's compliance with the S106 and ensuring that Local Plan sustainable development requirements are met.

Pricing and Choice

Regarding the proposed loss of 7,780 existing on-airport spaces, the Council would ask how this may potentially affect the range of pricing and parking packages offered on-airport. We note for example that the Summer Special spaces, understood to be at the more affordable end of GAL's offer, would be lost. Arguably, this will increase the unauthorised demand for car parking as it is suspected that a lot of the car parking demand away from the Airport is cost based. The Council appreciates there is need for GAL to balance the supply of parking to encourage increased passenger access by sustainable transport mode, whilst ensuring that its on-airport offer is sufficiently attractive to deter customers from less sustainable off-airport

.../

locations. In the absence of an updated parking strategy, it is not clear if the replacement spaces would retain/improve the current range of parking pricing and how this fits into the wider Airport Surface Access Strategy.

Baseline Assumptions and the Robotic Parking Proposals

The Council accepts that several of the parking proposals have already been through the EIA screening process with Crawley Borough Council and may therefore reasonably form part of the baseline. However, this isn't the case for the 2,500 additional robotic spaces being proposed which should be considered as new proposals as part of the DCO.

We are therefore of the view that GAL should undertake the necessary screening with Crawley Borough Council to support inclusion of the 2,500 spaces to ascertain whether these qualify as Permitted Development. Otherwise, these spaces should be removed from the baseline.

Airport Surface Access Strategy (ASAS)

It is noted that GAL intends to prepare an updated Airport Surface Access Strategy for the Northern Runway Project, which will include a Parking Strategy, amongst other documents. This is welcomed and the Council looks forward to understanding in greater detail, the proposed strategies for Bus & Coach and Rail travel, Highways, Parking and the Staff Travel Plan which will set out measures to support employees to choose more sustainable journeys to work. The Council requests that once the updated ASAS is developed, and the traffic modelling concluded, details are shared with the Local Authorities ahead of the submission of the DCO application.

It is understood that GAL is analysing potential bus and coach service improvements for access to and from the airport. One of the routes that is being assessed is Horsham and Worthing. The Council welcomes this assessment, and we look forward to engaging further with GAL regarding any opportunities for additional provision along this route.

Project Updates

The Summer 2022 Consultation Document describes how some elements of the Project (not specific to the highway improvements) have been developed or changed since the Autumn 2021 Consultation. It is noted that GAL states that these updates are not considered to lead to new or materially different significant environmental effects from those reported in the PEIR.

Water Management

The Council has no specific concerns to raise with the update provided within Section 3.6 of the Consultation Document on Water Management.

.../

It is noted that the above-mentioned Section has incorporated last year's Environment Agency updated climate change allowance for peak river flows. This has had the effect of reducing the required climate change allowance on the River Mole catchment. Consequently, the revised modelling of the airport drainage network has demonstrated that some of the previously proposed flood compensation areas can be reduced in size, and two can be removed entirely.

It is understood that both the '*Lead Local Flood Authority*' West Sussex County Council and Crawley Borough Council have been involved in this consultation and conversations regarding the changes.

Landscape and Ecology

The Council has no comments to make at this stage regarding Landscape and Ecology considerations, however, we look forward to continued dialogue with GAL as preparation of its DCO application progresses.

Carbon

Topic Working Group meetings have been taking place between the Local Authorities and GAL to inform the development and assessment of the Northern Runway Project. There are numerous groups covering key topics although, to date, Topic Working Groups have not taken place for the Carbon and Climate Change topic in the most recent round of meetings.

We understand that GAL is developing a Carbon Action Plan which will describe the actions that GAL will take to reduce carbon impacts within its control. The Council therefore looks forward to understanding in more detail the carbon assessments for the Northern Runway Project, particularly in the context of the Government's Jet Zero aspirations.

Noise

The majority of the information on Noise in the Consultation Document refers to the impact of changes to the road network and the information available on ground noise does not show that there will be any adverse impacts on communities within Horsham District.

Section 3.9 highlights that a Noise Envelope Group has been formed to engage with stakeholders to explore the Noise Envelope proposal set out in the Autumn 2021 Consultation. The timescales for this engagement are short (between May and September) and this is of concern to the Council, particularly around the adequacy of the process to enable effective consideration in the development of the Noise Envelope.

Housing and Local Infrastructure Impacts

The Council welcomes that more detailed analysis on construction employment, the potential impacts of the temporary construction workforce on housing need and the effects of the

.../

Covid-19 pandemic on local employment that is being undertaken. We look forward to receiving details of the emerging evidence base in due course. As the Council highlighted in its formal response to the Autumn 2021 Consultation, consideration of the affordability of housing for new workers is very important and analysis of the types and tenures of housing needed must form part of the evidence base.

It is noted that GAL is refreshing the socio-economic and economic study areas which will support the assessment of potential effects of the Project on receptors in these areas. The Council remains concerned that the Labour Market Area and the Five Counties Area are, geographically, too large to properly understand the effects on those areas, such as Horsham District, which are closer to the Airport. The Council understands that GAL intends to provide a more granular analysis at the local planning authority level and this is welcomed. We look forward to understanding these findings in more detail and request that sufficient time is afforded to the Local Authorities to digest and respond to the evidence base before submission of the DCO application.

Offices & Hotels

Paragraph 3.5.6 details the updated hotel proposals which comprise 250 additional bed spaces than that proposed as part of the Autumn 2021 Consultation. Conversion of the Destinations Place office building to a hotel is a new proposal and means that the loss of this existing on-airport office floorspace would potentially generate the need for one new office block. There does not appear to be any explanation and justification for these proposals, particularly as the configuration, phasing and amount of floorspace is unknown at this stage. It would be helpful to understand the rationale for the conversion of the existing GAL offices to a hotel and the re-provision of a new office.

Other Matters

The Interaction with Airspace Change Proposals

It is noted in paragraphs 1.1.5 and 1.1.22 that GAL continues to refer to no new flightpaths as a consequence of using the Northern Runway and that the wider Future Airspace Strategy Implementation South (FASI-S) airspace changes are not required to enable dual runway use. The Council raised concern with the lack of acknowledgement of the interaction between the growth of the Airport and the airspace changes.

Whilst GAL is correct that the proposal to make simultaneous use of the Northern Runway will not require airspace change, realising the overall growth in aircraft movements envisaged, particularly when growth in activity at other airports across the South of England is taken into account, will necessitate some changes to airspace in the vicinity of Gatwick as part of the modernisation process.

.../

By continuing to not acknowledge this wider interaction it is considered somewhat misleading as NATS are clear that FASI-S is required to enable growth through the London airspace system. So whilst the statement is true in strict terms of the requirement for new changed routings, it is not true in terms of unlocking the growth potential. This should as a minimum be acknowledged.

Further to this, and as GAL will be aware, the increased use of the WIZAD SID¹ is of concern to the Council, given that this will result in increased overflight of Horsham District. It is considered, the implementation of FASI-S could, of itself, be a driver for requiring greater use of WIZAD to route some Gatwick departures away from interactions with Heathrow arrivals and departures and / or to provide a respite route from MIMFO SID². In any event, significantly greater use of WIZAD will be required to achieve the suggested hourly movement rates both with and without the Northern Runway use and this would need to be aligned with FASI-S and potentially require an assessment against the CAP1616 criteria for airspace change.

Aviation Growth Forecasts

GAL has made reference to the Government's Jet Zero ambitions which commit the UK aviation sector to reach net zero by 2050 and this welcomed. However, it is noted that GAL compares its 2047 demand projections with the DfT Jet Zero updated national forecasts for 2050 in Table 3.3 of the Summer Consultation document. This is considered misleading in two ways:

- (i) Firstly, it is comparing 2047 with 2050 and GAL is silent on whether it would still expect growth beyond 2047 with the Northern Runway Project;
- (ii) Secondly, most of the growth projected with the NRP is over the period to 2038.

Comparisons in 2032 or 2038 (DfT has provided year by year figures) show that GAL's projected growth is almost double or 40% greater than the rate of aviation growth projected nationally implying a substantial increase in market share which would be at the expense of other airports and would need to be accounted for at the very least by displacement allowances in the economics assessment. By 2047, the gap has narrowed substantially. All of GAL's assumed growth is front loaded to the period to 2032, beyond 2032 growth is slower than DfT's assumed national growth rates. This has the effect of bringing forward the benefits and will skew the economic appraisal that is presented. It is considered that this will need addressing to ensure that a more accurate assessment is undertaken.

¹ Also known as Route 9, WIZAD is a Noise Preferential Route for departing aircraft and is a Tactical Offload Route (e.g. for use in the event of thunderstorms) not usually offered as a flight path. This means that the route experiences little overflight currently, although this is anticipated to change in the future.

² NATS describe WIZAD SID as a tactical routing allocated by Air Traffic Control (ATC) to alleviate airspace congestion and may be offered at a late stage of taxiing to aircraft normally allocated MIMFO SID. Pilots unable to accept WIZAD SID when offered must inform ATC and will be re-allocated MIMFO SID. NATS advise WIZAD SID should not be used for flight planning purposes.

.../

Consultation Method

As detailed in paragraph 1.3.2 of the Summer 2022 Consultation document, GAL has conducted this consultation virtually and through online activity. GAL contacted the Gatwick Local Authorities on 3 May 2022 for feedback on its draft approach to the Summer Consultation. The Council had limited time to respond (9 working days) and offered a number of recommendations that we considered would enhance the quality and effectiveness of the consultation.

The Council also queried the rationale for conducting a wholly virtual consultation with no in-person meetings. Whilst we also had similar concerns that we raised at the time over the Autumn 2021 Consultation, there is clearly less reason during this consultation not to hold any public meetings or exhibition events. The benefits of virtual engagement are many, but it will not reach as many people as it would if face-to-face engagement were included as well. The Council considers that a suite of different engagement activities complement each other to generate the greatest level of engagement.

Inclusion of videos to depict the road improvements and the dual runway operations is welcomed, particularly as this was not included in the Autumn 2021 Consultation and was in response to suggestions from the Council, alongside other local authorities. A visual aid such as this helps members of the public and stakeholders to understand the proposals more easily. It is a shame the videos were not narrated which would have enhanced the quality of the description of works. We are however, pleased this was included and the length of the Consultation was extended by two weeks, which was also actioned by GAL following feedback from the Local Authorities.

Thank you once again for the opportunity to comment on this consultation. If there are any questions regarding our response, or you would like the opportunity to discuss any of the issues raised in more detail, please do not hesitate to contact me.

Yours sincerely,



Barbara Childs
Director of Place
Horsham District Council