

Officer Decision under delegated powers

Title:

Consultation response: Draft Gatwick Airport Masterplan 2018

January 2019

Background:

Section 1.19 of the Scheme of Delegation contains delegations for Heads of Service to respond to consultations from Government, Agencies, Local Authorities or other organisations on behalf of the Council in consultation with the appropriate Executive Member or Committee Chairman.

Consultation:

The following consultation has been undertaken:

- Discussion of the principles to be included in the consultation response at the Leader's meeting on 3rd December
- The draft response has been shared with, commented on and agreed by the Council Leader and the Executive Member with responsibility for Business and Economy (which includes Gatwick Airport)

Decision(s):

Describe the decision being made.

Agreeing the Council's consultation response to the consultation on Gatwick Airport's draft Masterplan; the main aspects of which are:

- That there is not enough detail within the masterplan to take a view on the proposed routine use of the standby runway
- To support in principle for the continued safeguarding of the land to provide future flexibility however that this should not be interpreted as Council support for a new runway on that land
- That the airport operators should fully assess the potential impacts of future growth on local infrastructure and to fully fund any mitigation measures required.

Reason(s) for decision:

Explain the reason(s) for the decision.

To make clear the Council's position in relation to the Masterplan proposals.

To reserve the Council's position in respect of any future planning application or development consent order for airport expansion, allowing for consideration to be given to more detailed technical information that will be published at this stage.

To ensure that the impacts of any future airport growth on the borough and its residents is mitigated and minimised.

Alternative option(s):

Do not send a consultation response.

To respond to the consultation in a different way to as set out above.

Appendices:

Appendix 1: Masterplan consultation response

Declarations of interest:

Please refer to the [Code of Conduct](#) for guidance on interests.

If you think you have an interest in this Officer Decision, please Contact [Democratic Services](#) (01737 276182).

Decision taken by: Luci Mould/Cath Rose



Signature:

Date: 07/01/2019

Post held: Director of Place Services / Head of Corporate Policy

Note: Once this is signed it must be published by the Decision Maker via the Modern.gov Officer Decision portal. If this document contains exempt information, you must upload it as an exempt document. Further instructions are available in the guidance on the [web library](#).

Places & Planning

By email:

gatwickdraftmasterplan@ipsos-mori.com.

Date: 07 January 2019

Dear Sirs,

Draft Gatwick Airport Master Plan Consultation Response

Thank you for the opportunity to comment on the draft Gatwick Airport Master Plan.

Reigate & Banstead borough is located directly to the north of Gatwick Airport and approximately 10% of those employed directly by the airport live within the borough (approximately 2,000 people). Key transport corridors to the airport pass through the borough (the London to Brighton Mainline, the A23/M23, the North Downs Line and the M25) and in the southern part of the borough, in particular Horley, there is a concentration of firms that support or are related to the presence of the airport.

Reigate & Banstead Borough Council (RBBC) appreciates that within the National Aviation Policy Framework, the Government recognises that the aviation sector is a major contributor to the economy and that one of their main objectives is “to ensure that the UK’s air links continue to make it one of the best connected countries in the world”. In line with the National Aviation Policy Framework, we also recognise that the aviation industry makes an important contribution to UK Gross Domestic Product and employment.

The Council notes that whilst the National Aviation Policy Statement confirmed Heathrow as the Government’s chosen location for a new runway, that the government in June 2018 also produced “*Beyond the Horizon: The future of UK aviation. Making best use of existing runways*” Policy Statement which says that “the government is supportive of airports beyond Heathrow making best use of their existing runways”. In principle, therefore, we support development of Gatwick Airport in line with national policy, subject to proper consideration by the relevant planning authority. However, **we do not consider that there is enough detail**

within the draft Masterplan (for example, on economic impact, jobs and skills impact, housing impact, environmental impact and surface transport impact) **to provide detailed comments or take a view on the proposed routine use of the standby runway until the local environmental and spatial planning impacts are better modelled and understood.** With regards to the proposed continued safeguarding of land for an additional runway to the south of the main runway, **RBBC in principle supports the continued safeguarding of the land to provide future flexibility, however we stress that this should not be interpreted as Council support for a new southern runway.**

Reigate & Banstead Borough Council considers that irrespective of the growth scenario, growth at Gatwick will inevitably have local environmental impacts. **We expect the airport operators to fully assess the potential future impacts on local infrastructure and to fully fund any mitigation measures required.**

I include a detailed officer level response to the consultation questions in the Annex to this letter. These comments are provided on a “without prejudice” basis to any future Development Consent Order (DCO).

RBBC remains committed to continued working with GAL and neighbouring authorities to develop a more detailed understanding of the implications of growth/development at Gatwick and any potential mitigation measures that would be required to make any future development acceptable, and I look forward to continuing to work constructively with you on this matter.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'Luci Mould'.

Luci Mould
Director of Place Services

Annex: Detailed comments

To what extent do you support or oppose the principle of growing Gatwick by making best use of the existing runways?

In principle, the Council is supportive of the development of Gatwick Airport in line with national policy. The Council recognises that the 2018 Policy Statement *Beyond the Horizon: The Future of UK Aviation Making the Best Use of Existing Runways* states that the government is supportive of airports beyond Heathrow making the best use of their existing runways, but notes that at paragraphs 1.22 and 1.29 that the Government states that they recognise that the development of airports can have negative as well as positive local impacts upon local communities including on noise, air quality and surface access and that any proposals should take careful account of all relevant considerations including environmental impacts and proposed mitigations. **The Council does not consider that there is enough detail within the masterplan** (for example on economic impact, jobs and skills impact, housing impact, environmental impact and surface transport impact) **to provide detailed comments or take a view on the proposed use of the emergency runway until the local environmental and spatial planning impacts are better modelled and understood.**

The Council recognises that at paragraph 5.3.33 of the Gatwick masterplan, GAL recognises that as part of any future DCO process that they will be required to demonstrate that they have fully investigated all the impacts of the scheme and ensured that they are adequately mitigated and that this will involve a process of detailed engagement with all stakeholders as well as public consultation on the main features of the scheme. The Council would expect to be fully involved in this process as any development of Gatwick will impact upon the borough (and the wider area) in terms of housing need, employment impact, traffic impact and other environmental impacts (such as noise, air quality and biodiversity).

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

The Council recognises that as stated at paragraph 5.4.11 of the masterplan, GAL are not actively pursuing the development of an additional runway at Gatwick but believe that it is in the national interest to continue to safeguard land as this will preserve the option of building an additional runway in the future to meet the future airport capacity gap that the Government's forecasts indicate will occur even with a third runway constructed at Heathrow.

In the response to the 2015 Airports Consultation on proposals for a new second runway at Gatwick, the Reigate & Banstead Borough Council decided not to support or object to a second runway but instead our position was that whatever the final decision on the location of an additional runway we would work to ensure that the maximum benefits would be secured for our residents and businesses whilst ensuring the minimisation of the negative impacts.

The Council considers that the development of an additional runway will have economic, transport, housing, environmental and other impacts, but notes that at this stage there is no up to date information available on the potential impacts or mitigation required alongside the Scenario 1 and 2 proposals and therefore, the Council considers that it is very difficult to make an informed view.

The Council therefore considers that land to the south of the airport should

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continue to be safeguarded to allow for further expansion to be considered at a later date but is clear that this should not be interpreted as the Council supporting an additional runway to the south of the existing main runway.

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

The Council recognises that Gatwick Airport plays a significant role within the local, regional and national economy. Gatwick Airport is part of the Gatwick Diamond initiative which investigates employment and skills development, as well as supply chain opportunities, international trade and inward investment and works with local authorities and education partners to promote employment opportunities at Gatwick (for example, through participating at the Reigate & Banstead Borough Council Big Bang school career event). It is recognised that Gatwick Airport has been actively involved in the Gatwick Diamond 'Meet the Buyers' event which provides opportunities for local suppliers to meet with larger buying organisations, supported by a programme of free seminars to help local businesses to develop and improve their skills and achieve successful sales outcomes, and the Council would like to see this type of partnership continue in the future.

The Council recognises that the continued growth and expansion of Gatwick Airport is likely to bring economic benefits for Reigate & Banstead residents and businesses. It will drive the ability of the region to compete on the global stage and attract inward investment which will be increasingly important. The airport itself provides a wide variety of job opportunities across a range of skill levels including airline operations, baggage handling, airport security and retail, air traffic control and aircraft maintenance and provides a number of indirect and direct employment opportunities for local residents. The Council however considers that there is further potential to provide employment benefits for local residents through encouraging businesses of all sectors and skills within the airport boundary and within partner organisations to recruit and provide apprentices, up-skilling opportunities for local residents and local employment.

The Council also considers that there is further potential to develop closer links between research, innovation and local businesses. Within the masterplan there appears to be a focus on building and maintaining relationships with regional universities. The Council recognises the importance of this and suggests that these relationships should be maintained as they provide wider benefits to region as a whole. The Council however also suggests that there should be a focus within the masterplan on building and maintaining relationships with local higher education and further education establishments as this will enable local education providers to programme courses that are in line with future job requirements at the airport.

The Council notes that GAL estimates that currently approximately 24,000 people are employed directly at the airport and a further 47,000 residents within the Gatwick Diamond are indirectly employed by the airport. GAL anticipates that the total number of jobs with the existing configuration will increase to 79,000 by 2028 and that the total number will increase to 91,000 with the use of both the standby and existing runway. What is unclear from the masterplan is how the jobs (both skill and number) are related to borough residence. It is recognised that at paragraph 5.6.16 of the masterplan that GAL states that it will carry out a more detailed assessment of the economic benefits of the standby runway if it is taken forward to the DCO process. We consider that this should include a detailed breakdown in terms of the type of employment growth by local authority to enable us to understand the true, local impact of each scenario. This is important as this will impact upon the housing and employment needs local authorities are expected to plan for. It should be noted that both Reigate & Banstead Borough Council and Crawley Borough Council have adopted Local Plans which – due to policy and/or geographical constraints - don't plan to

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meet their full housing needs and that moving forward both authorities will need to consider its future housing targets irrespective of Gatwick growth. For the Council to be able to provide more detailed comments with regards to either scenario, it is therefore important that further detail is provided to enable us to understand the possible employment and housing impacts of the proposed growth.

The Council notes that at paragraph 5.2.20 of the draft masterplan that GAL recognises that there will need to be some further office and hotel development at the airport. The Council understands that there have been a number of planning permissions granted (albeit a number on a temporary basis) to declassify the use of on-airport office space for non-airport related uses. The Council considers that any future office development on airport should be only for airport related uses and that before any development (for either offices or leisure facilities) consideration is given to the potential impact on neighbouring towns (for example, Horley, Crawley and Redhill) and employment areas (for example, Horley Business Park, Manor Royal and Horley, Salfords and Redhill Industrial Estates).

The Council considers that any growth at Gatwick Airport will create additional employment pressure for neighbouring authorities. It is noted that Crawley Borough Council, due to the safeguarded land requirements, cannot currently meet its employment needs and therefore there will be increased pressures on neighbouring authorities to meet their employment needs. Through its local plan, RBBC has proposed the allocation of land for a new strategic business park in close proximity to the Airport, and will continue to liaise with GAL about this.

The Council also considers that given the close proximity of Gatwick Airport to towns such as Horley, to maximise economic benefits and employment benefits for local residents arising from Gatwick Airport's continued growth, that there should be some reference to how GAL will encourage visitors to stay in local towns and make use of local services and facilities.

It is noted that for both scenarios 1 and 2, GAL anticipates significant growth in cargo. For scenario 1 GAL anticipates a growth from 102,000-220,000 tonnes and that this can be accommodated using the existing cargo facilities at the airport; and for scenario 2 GAL anticipates an increase from 102,000-325,000. No detail is provided as to how the cargo needs will be met for scenario 2 and no detail is provided for anticipated cargo for scenario 3. The Council notes that the cargo facilities are not owned/operated by GAL and that there are no detailed plans as to how the existing cargo facilities will be remodelled to accommodate the increased amounts for scenario 1 and that there are no detailed plans as to how the cargo needs arising from scenario 2 will be met. Any growth in cargo is likely to impact upon neighbouring authorities' employment needs, if not only in terms of direct storage facilities but also supply chain and distribution impacts. More detail is therefore needed.

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

At paragraph 3.2 of the National Aviation Strategy (2013) the government recognises that noise is the primary concern of local communities near airports. At paragraph 17 it says that the government's overall objective on noise "is to limit and where possible reduce the number of people in the UK significantly affected by aircraft noise". Crawley Borough Council provides technical detail in relation to noise to local authorities surrounding Gatwick Airport and their advice is that some of the statements within the masterplan may be misleading and that it is unclear what assumptions have been modelled. Our comments should therefore be read in line with Crawley Borough Council's response to this question.

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Reigate & Banstead Borough Council notes that through scenario 1, GAL anticipates that Gatwick's noise footprint will continue to reduce; through scenario 2 GAL anticipates that noise levels will be broadly similar to today's levels; and that for scenario 3 no detail is provided. GAL's Decade of Change Goal is to reduce the impact of operational noise and implement Gatwick's European Noise Directive Noise Action Plan; maintain Gatwick's position as 'best practice' for noise management' and work with airlines and partners to reduce noise impacts on Gatwick's campus. In addition to these goals, GAL anticipates that the noise levels will reduce/be similar to current levels under scenarios 1 and 2 respectively, through the introduction of quieter planes and changes to the planned modernisation of the South East airspace which has the potential to offer new ways of offering noise respite to communities currently overflowed. The Council notes that as stated at paragraph 3.4.5 of the draft masterplan, the proposed South East airspace strategy is not intended to be implemented before early-2024 and that scenario 2 is likely to be operational mid-2020s and therefore we question whether there would be some increase in noise levels prior to the implementation of the South East airspace strategy. The Council also notes that there is no detail within the masterplan as to any guarantees as to the introduction of newer quieter aircrafts. The draft masterplan is also not clear in terms of what assumptions have been used for noise exposure levels; for example the number of quieter aircraft, overflying hours and whether population levels include new planned developments. It is considered that this level of detail should be provided for any future DCO to enable proper scrutiny.

The Council notes that paragraph 3.28 of the National Aviation Strategy (2013) says that "the Government expects airports to make particular efforts to mitigate noise where changes are planned which will adversely impact the noise environment. This would be particularly relevant in the case of proposals for new airport capacity, changes to operational procedures or where an increase in movements is expected which will have a noticeable impact on local communities. In these cases, it would be appropriate to consider new and innovative approaches such as noise envelopes or provision of respite for communities already affected". It is therefore suggested that these ideas are explored in addition to relying on the quieter planes and the South East airspace strategy.

In terms of ground noise, whilst there is considerable detail regarding the ways in which GAL tries to reduce ground noise, the Council notes that there is no information within the draft masterplan on the current or future levels of ground noise and this should be provided for any future DCO process. This should also include transparency over any assumptions made.

Reigate & Banstead Borough Council recognises that GAL tries to engage with local communities through the Noise Management Board and notes that at paragraph 1.1.14 of the draft masterplan that they will continue to support the Noise Management Board and engage with local communities to identify and implement noise reduction and mitigation strategies. The Council notes that recently, as reported at a recent GATCOM meeting, there was a vote of no confidence in the Noise Management Board and the Council understands that work is being undertaken to resolve these issues. Should this result in the de-formation of the group, the Council would expect GAL to continue to engage with local stakeholders and community groups regarding potential noise impacts. The Council notes that there is no detail within the draft masterplan as to other ways in which GAL will engage with other communities that are not represented on the Noise Management Board (for example, local resident associations).

The Council notes that as stipulated in paragraphs 1.1.20 and 6.4.19 that GAL provides noise insulation grants and that a review of the scheme is due to take place. However, the draft masterplan does not provide any detail with regards to the number of households who have

benefited from the scheme, nor how residents are made aware of the scheme. This would be helpful in understanding its effectiveness as a mitigation measure.

The Council considers that the masterplan should take into account the fact that Leq noise contours are equivalent noise level contours and are a way of presenting a single decibel value for a period of time when sound levels vary and therefore not a good indicator of the annoyance and harm caused by aircraft overflights as it averages noisy peak events to a single level whereas in reality aircraft noise is experienced intermittently and therefore creates more annoyance. The Council notes that there are N-above contours which measure the number of noise events that exceed certain decibel levels (e.g. N60 and N65) which are not referenced within the draft masterplan. The Council considers that there needs to be some acknowledgement of this as halving the number of overflights which would lead to significant reductions in terms of annoyance would only lead to a fall of 3dB Leq.

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

The Council recognises GAL's overarching vision to be the airport of the future and a model for sustainable growth and that as stated at paragraph 14 regardless of the development scenario selected, GAL remains committed to operating and developing Gatwick in a sustainable way. In terms of other environmental impacts of Gatwick's continued growth, the Council considers that there is limited information within the draft masterplan as to the possible environmental implications and therefore we reserve our position in relation to the environmental impacts until more detail is provided. It is understood that more detail will be provided as part of any future DCO process.

In terms of mitigation required for the growth scenarios, the Council also considers that there is limited information within the draft masterplan and therefore again reserves our position to provide more detailed comments at a later date. The Council notes that at paragraph 5.3.34 of the draft masterplan that it is stated that as part of any future DCO process GAL anticipates consulting on environmental mitigation and compensation measures. Given the level of detail required and technical experience required if no other public consultation is planned on the environmental impacts and proposed mitigation measures other than pre-application consultation for any future DCO, the Council would expect to see GAL extend this consultation period beyond the short statutory time period to allow sufficient time for consultees to assess and respond to the information.

The Council notes that at paragraph 2.4 of the National Aviation Strategy it states that the "government's objective is to ensure that the aviation sector makes a significant and cost-effective contribution towards reducing global emissions". Consideration therefore needs to be given to air quality, noise, carbon dioxide levels and biodiversity impacts (such as the impact on Mole Gap to Reigate Escarpment Special Area of Conservation).

Reigate & Banstead Borough Council provides advice to neighbouring authorities in relation to air quality. The Council considers that there is limited information within the draft masterplan and therefore reserves the right to provide detailed comments once further information is provided. However, initially the Council has some concerns regarding the reliability of the modelling outcomes reported in the draft masterplan. It is noted that the inventory methodology changed between 2010 and 2015 and that this is not stated; that the modelled 2015 concentrations do not reflect measured results at roadside receptor points in Horley and Crawley (for example, the highest modelled concentration in 2015 was 33µg whilst the highest measured result was 45µg); and that the modelling carried out by ARUP has consistently underestimated roadside pollutant

levels (for example in the Hazelwick Air Quality Management Area, NO₂ levels have been underestimated by as much as 80-90% at some locations). Given that the model has been unable to record accurate roadside concentrations, we have concerns with regards to the reliance on the model to predict future near-road levels. Questions could also be raised over the validity of the claim that there will be no exceedance of local air quality limits as a result of the proposed expansion schemes. Further information should be provided for any future DCO process with regards to the assumptions used in predicting future levels of air quality.

The Council also considers that there is a need for further information regarding assumptions such as modal shift and quieter/more environmentally friendly planes. The Council considers it may be necessary to either test a range of scenarios with different assumptions or undertake a number of sensitivity tests to give a broader reflection of the possible impact of the growth scenarios in terms of possible environmental impact.

In terms of waste, the Council recognises that as stated in paragraph 4.5.38, Gatwick was the first airport to hold Carbon Trust's Zero Waste to Landfill standard and that Gatwick has a waste-processing plant which reduces subsequent carbon emissions. However, it is unclear from the draft masterplan what the future waste levels will be and whether there will be a need to extend the current premises or build another facility and where this will be located.

The Council notes that in response to the Reigate & Banstead Development Management Plan Regulation 19 Publication, Thames Water raised concerns regarding the possible capacity of sewerage plants in the Gatwick area and urged developers to engage in early conversations with themselves. Some evidence should therefore be provided that there is sufficient sewerage capacity to accommodate existing businesses and residents, planned developments within the Gatwick area and the proposed growth of Gatwick Airport.

Do you believe our approach to community engagement, as described in the draft Master Plan, should be improved, and if so, how?

Given the proximity of Horley to Gatwick Airport, the Council was disappointed that a public exhibition was not initially planned for Horley and urges that any future consultation should include events within Horley and in accessible locations. To improve community engagement going forward the Council expects that copies of the masterplan be made available for public inspection in public locations, such as public libraries and the council offices, and that their availability for public inspection be publicised.

In addition, what is unclear from the masterplan and related webpages is the extent to which local community groups (such as resident associations, town councils, business groups etc.) have been informed of the draft masterplan consultation and how they will be engaged in any future DCO process. It is worth noting that there is limited professional experience of the DCO process and therefore efforts will need to be made especially to engage with local residents and businesses to ensure these groups have sufficient opportunity to get involved. Given this, the complexity of the DCO process and the amount of detail expected to be provided as part of any DCO application, the Council would expect GAL to extend consultation time periods beyond statutory minimums.

The Council notes that paragraph 4.3 of the National Aviation Policy Framework (2013) says that the "government's objective is to encourage the aviation industry and local stakeholders to strengthen and streamline the way in which they work together" and that "local stakeholders have the experience and expertise to identify solutions tailored to their specific circumstances. We therefore want to encourage good practice rather than propose a "one size fits all" model for local engagement". The Council recognises that GAL tries to engage with the local business and

resident community through sponsoring events; engaging in business groups such as the Gatwick Diamond initiative; providing employment volunteering opportunities for staff with local organisations; the Gatwick Airport Community Trust; the Gatwick Foundation; attending career events; the education programme; and through GATCOM.

Whilst the Council considers that schemes such as the education programme, Gatwick Airport Community Trust and the Gatwick Foundation Fund are beneficial for local residents and community groups, what is unclear from the masterplan is the extent to which local communities (i.e. broken down by local authority area) benefit from these schemes. No detail for example is provided of funding examples, nor how many people benefit from the funding. What is also unclear from the masterplan is whether these schemes will be improved with the level of development planned (for example, whether increased growth at Gatwick will result in increased funding for the Gatwick Foundation).

The Council recognises the importance of GATCOM, the airports independent consultative committee, appreciates that GAL participates actively within GATCOM and are encouraged to see a commitment from GAL within the draft masterplan to continue to do so. The Council considers that GATCOM is made up of a wide range of interests including local communities, but notes that not all local communities are represented on the board. The Council considers that what is missing from the draft masterplan and what is needed to be provided is information on how GAL engage with other community groups (for example local residents associations or business groups and in particular those who are impacted by Gatwick related traffic, employment pressures, air quality, overflying etc.). At paragraph 8.1.6 of the masterplan it is stated that ‘in addition to specific engagement on noise issues we have a wider community engagement programme which is focused on building positive relationships, through listening, sharing information and playing an active role in events and programmes across the region’ however, no detail is provided as to the wider community engagement. The Council considers that some high level detail should be provided in the masterplan.

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

The Council notes that paragraph 5.11 of the National Aviation Strategy (2013) states that “proposals for airport development must be accompanied by clear 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”. The Council notes that the Surface Access Strategy referred to in the draft masterplan and available on GAL’s website is the draft Surface Access Strategy which Reigate & Banstead Borough Council provided detailed comments on in May 2018. The comments previously provided should be read alongside these comments and should be taken into consideration in the preparation of the final Surface Access Strategy and masterplan.

The Council recommends that GAL considers combining their final masterplan and Surface Access Strategy into one document (or maybe provide the Surface Access Strategy as an appendix to the masterplan) as paragraph 4.5 of the National Aviation Strategy (2013) recommends that airports combine their Surface Access Strategies and masterplans into one document to make it easier for people to access information about the airport’s plans.

The Council notes that paragraph 4.20 of the National Aviation Strategy (2013) states that “local people, town and parish councils which have qualifying airports within their boundaries, business representatives, health and education providers, environmental and community groups should be

involved in the development of airport surface access strategies". The Council considers that what is unclear from both the Surface Access Strategy and the draft masterplan is the extent to which all these groups have been involved in the preparation of the Surface Access Strategy.

The Council notes and agrees with the statement in the draft Surface Access Strategy that says that "our surface access links by road and rail are essential for delivering customer service and a safe and accessible workplace. They ensure people and goods have access to Gatwick as a gateway to the world, and connect returning travellers and overseas visitors to the rest of the UK". The Council recognises the importance of sustainable transport – as stated in paragraph 4.4.31, "despite approximately 30% growth in annual airport demand since 2012, road traffic associated with Gatwick's operation has increased by less than 15%" due to sustainable alternatives.

The Council also recognises that the purpose of the Surface Access Strategy is to ensure that Gatwick has a robust strategy to manage and improve surface access and that the Surface Access Strategy is subject to regular monitoring and covers only a period of approximately five years. The Council understands that the targets outlined in the Surface Access Strategy will remain the targets for at least the next five years irrespective of the level of growth at Gatwick, however, notes that this is not stipulated within either the Surface Access Strategy or the masterplan. Whilst the Surface Access Strategy contains a number of actions what is unclear is which actions are needed for each growth scenario and what level of impact each action is expected to deliver. Further detailed information with regards to the levels of development and mitigation required for each growth scenario should be provided. Planned growth in nearby local authority areas must be taken into account in assessing impact.

As stated in paragraph 5.2.15, GAL anticipates that for scenario 1 the local road network will be able to accommodate growth to 57-61mppa without significant deterioration in performance with the delivery of improvements to the North and South Terminal roundabouts and the delivery of the M23 Smart Motorway. Paragraph 5.2.15 states that this allows for both airport and non-airport traffic growth and assumes that Gatwick will continue to be successful in reducing car trips to and from the airport in line with the Surface Access Strategy targets.

For scenario 2 limited detail is provided: paragraph 5.3.30 states the local road network will require some upgrades (i.e. improvements to the North and South Terminal roundabouts); paragraph 5.3.30 further states that GAL "are considering options for enhancing road capacity where it may be required in line with anticipated growth. If the standby runway scheme is taken forward, the optimum highways solution would be identified through further road modelling and through discussion with Highways England and the Local Highway Authorities. It would also form the basis of a detailed Transport Assessment which would be a key input to a DCO application". Paragraph 5.3.32 states that GAL will "work closely with Highways England, Network Rail and Local Highway Authorities to ensure that any measures to support access to the airport also take account of the needs of non-airport traffic and are not detrimental to overall network performance". We would expect GAL to engage with Surrey County Council as well as West Sussex County Council, and with adjoining boroughs and districts, including Reigate & Banstead Borough Council as it appraises its growth options.

Reigate & Banstead Borough Council are keen to stress the need for commitment from GAL for sufficient investment in transport infrastructure to manage the impact of any future growth not just on the immediate road and rail network but the wider network as well. Reigate & Banstead Borough Council are also keen to stress the need for GAL to undertake detailed work in terms of potential housing, and subsequent infrastructure requirements such as schools, healthcare, waste water etc., associated with each scenario and for GAL to provide a commitment to provide financial

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contributions to towards the infrastructure required to mitigate the impact of any future growth at the airport.

More work needs to be undertaken by GAL to understand the resilience of the transport network for each scenario, in particular in the event that the Brighton mainline or M23 experience disruption. The Council considers that this should for example include the knock-on impact on the local road network of any such disruption, and associated upgrades required to deal with this. The Council considers that there is a need for such work as the A217 and A25 are known to be particularly susceptible to congestion when either the A23/M23 or M25 are blocked.

Reigate & Banstead Borough Council notes that for all scenarios significant growths in cargo are anticipated. No detail is provided with regards to the impact on the local roads.

In terms of road, rail, bus and active transport requirements to accompany each growth scenario, the Council does not consider that there is enough detail (for example with regards to assumptions and requirements) to provide detailed comments. In terms of public transport, the Council recognises that improvements such as the Thameslink Programme and M23 Smart Motorway Scheme are being delivered, but notes that the government has not fully committed to either proposed improvements to the Brighton Mainline or M23/A23 corridor improvements. The Council also notes that within the masterplan it states that the station is expected to be completed by 2022/23 but that it is not fully funded nor has planning permission and therefore the expected timeframe could be exceeded. If scenario 2 were to go ahead, and it states in the masterplan that it could be operational by mid-2020s, then there could be a time when there are two runways operating with much higher passenger levels without completion to the improvement of the station. In terms of bus and active travel, it is noted that there is very little information within the masterplan. The Council notes that bus and active travel modes are particularly important for staff accessing the airport and looks forward to working with the airport to explore future sustainable transport interventions.