

# Consultation Response Form



## Introduction

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**The Airports Commission has assessed three options for a new runway in the South East of England:**

- Gatwick Second Runway
- Heathrow Extended Northern Runway
- Heathrow North West Runway.

**The Commission's analysis is captured in the following documents:**

- the Commission's Consultation Document;
- a business case and sustainability assessment for each scheme;
- a series of detailed technical reports.

An explanation of how to navigate the Commission's analysis is provided in Section 2 of the Consultation Document, and a topic-specific index to help navigate the analysis is provided at Annex A. The consultation documents can be viewed on the Commission's website.

The Commission wishes to consult on its assessments and assessment results. In particular, the Commission wishes to test the evidence base it has assembled, to understand stakeholders' views as to the accuracy, relevance and breadth of the assessments it has undertaken, and to seek views on the potential conclusions that might be drawn from them. It is also interested in receiving evidence and ideas about how any or all of the short-listed options might be enhanced or improved, for instance through mitigation measures to address specific impacts.

The consultation will run for 12 weeks, ending at midnight on 3rd February 2015.

## Using this consultation response form

This form can either be completed on a computer or printed-off and completed by hand. Details on how to submit the form via e-mail or post can be found at the back of the document. You may prefer to respond to the consultation via the Commission's online response tool, found on the consultation page under the link 'Respond online'.

# Consultation Response Form



## Questions

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The consultation questions are set out below, and are shown on the following pages with space to provide your response. There is no word limit for responses. If you are filling in the form by hand you may affix supplementary sheets as appropriate.

Please take care to ensure your comments are made in response to the relevant questions. You do not have to answer every question.

**Questions 1-2 invite your views and conclusions in respect of the three short-listed options.**

Q1	What <u>conclusions</u> , if any, do you draw in respect of the three short-listed options? In answering this question please take into account the Commission's consultation documents and any other information you consider relevant. The options are described in Section 3 of the consultation document.
Q2	Do you have any suggestions for how the short-listed options could be <u>improved</u> , i.e. their benefits enhanced or negative impacts mitigated? The options and their impacts are summarised in Section 3 of the consultation document.

**Questions 3-4 relate to the Commission's appraisal and overall approach.**

Q3	Do you have any comments on <u>how</u> the Commission has carried out its appraisal? The appraisal process is summarised in Section 2 of the consultation document.
Q4	In your view, are there any relevant factors that have <u>not been fully addressed</u> by the Commission to date?

**Questions 5-7 relate to how the Commission has appraised specific topics, constructed its sustainability appraisal and constructed its business case, respectively.**

Q5	Do you have any comments on how the Commission has carried out its appraisal of <u>specific topics</u> (as defined by the Commission's 16 appraisal modules), including methodology and results?
Q6	Do you have any comments on the Commission's <u>sustainability assessments</u> , including methodology and results?
Q7	Do you have any comments on the Commission's <u>business cases</u> , including methodology and results?

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**Question 8 asks if you have any further comments on any aspect of the Commission's work.**

Q8	Do you have any other comments?
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**Before answering the consultation questions we ask you to provide some details about yourself.**

The Airports Commission is committed to an open and transparent process and will therefore publish the results of its consultation, along with all technical substantive responses, in due course. Consistent with UK data protection law, the personal details of respondents will not be made public.

## Consultation Response Form



### About you

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**Are you responding to the Commission's consultation as an individual or as part of an organisation?**

☐ Individual

☒ Organisation

**Next**

## Consultation Response Form



### About you (continued)

*Please only answer this page if you are responding as an individual.*

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**Are you a UK resident?**

☐ Yes

☐ No

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## Consultation Response Form



### About you (continued)

*Please only answer this page if you are responding as an individual.*

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**Please provide the first part of your postcode, e.g. D12, SW17.**

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**Please supply your email address.**

*Your email address is important to help us ensure that all responses to the consultation are unique, and to inform you about the outcomes of the consultation if you would like us to do so. It will not be used for any other purpose.*

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**Would you like to be informed via email of the outcomes of the consultation?**

☐ Yes

☐ No

**Next**

## Consultation Response Form



### About you (continued)

*Please only answer this page if you are responding as an individual.*

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**Which of the following is your place of residence?**

- ☐ Africa
  - ☐ Asia (Middle East)
  - ☐ Asia (outside Middle East)
  - ☐ Australasia
  - ☐ Asia (Middle East)
  - ☐ North America
  - ☐ South America
- 

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☐ Yes

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☐ No

## Consultation Response Form



### About you (continued)

*Please only answer this page if you are responding as an organisation.*

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**Please provide the name of your organisation.**

West Sussex County Council

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**Please indicate the category of your organisation (select the most applicable option).**

- ☐ Business
- ☒ Local government
- ☐ Environment / Heritage group
- ☐ Action group
- ☐ Transport, infrastructure or utility organisation
- ☐ Elected representative (MP, councillor, MEP)
- ☐ Academic
- ☐ Statutory agency
- ☐ Other representative group

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**Is your organisation based in the UK?**

☒ Yes

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☐ No



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### About your organisation

*Please only answer this page if you are responding as an organisation.*

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☒ Yes

☐ No

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## Consultation Response Form



### About your organisation (continued)

*Please only answer this page if you are responding as an organisation.*

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**In which continent is your organisation based?**

- ☐ Africa
  - ☐ Asia (Middle East)
  - ☐ Asia (outside Middle East)
  - ☐ Australasia
  - ☐ Asia (Middle East)
  - ☐ North America
  - ☐ South America
- 

**Please supply your email address.**

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**Would you like to be informed via email of the outcomes of the consultation?**

☐ Yes

**Next**

☐ No

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## Your views and conclusions on the three short-listed options

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### **Q1 What conclusions, if any, do you draw in respect of the three short-listed options?**

In answering this question please take into account the Commission's consultation documents and any other information you consider relevant. The options are described in Section 3 of the consultation document.

*If you have any comments, please provide them below. If you have no comments, please go to the next question.*

1. The County Council will not be commenting on the two options relating to Heathrow Airport. It does not see its role as lending support to any particular option, but in considering the impact upon the communities whose interests it serves. Its comments are confined to the Gatwick Airport option – by reference both to that option being adopted or not adopted. Questions 1 and 2 are answered together. The suggested areas for improvement to that option are set out below by reference to specific areas of impact:-
  - business, employment and housing;
  - transport and other infrastructure;
  - environment;
  - competition;
  - public transport;
  - strategic highways;
  - local highways;
  - air quality;
  - air noise;
  - ground noise;
  - home noise insulation;
  - blight;
  - land take; and
  - pledges by the promoter.
2. Additional requirements to enable better planning for a range of impacts are presented in response to Question 8 below. These relate to specific infrastructure needs and how they will be funded, more reasonable compensation arrangements, education and training, health effects, flood protection and environmental mitigation. The County Council's comments are presented in the context of the effects that the expansion of Gatwick Airport might have on the nature of West Sussex and the potential overall impact that the Airport's expansion might have on the character and environment of the County.

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3. The Commission is urged to clarify and provide greater credibility to a number of its forecasting models and assumptions. This would allow agencies to plan with greater certainty and for communities to have greater confidence in the eventual decision.
4. There is a lack of clarity over the benefits to the economy when set against the unknown potential costs of Airport expansion and the necessary infrastructure and service improvements. The County Council is, therefore, concerned about the Commission's ability to draw conclusions on the basis of current data and projections. As the Commission's work is on-going, the County Council expects it to secure additional information and evidence to provide the necessary assurance and confidence to support conclusions.

### **General comments**

5. In relation to the Gatwick Airport option, the County Council has a long-standing legal agreement with Gatwick Airport's owner that construction work on an additional runway cannot commence before 2019. The agreement, signed in 1979, is still fully supported by the County Council and Gatwick Airport Limited (GAL). However, there are fewer than five years until that agreement expires. The local, national and global economies have changed significantly since 1979. The demand for, and attitudes towards, air travel and international business have also changed significantly.
6. Looking ahead, patterns of international trade and business are difficult to predict, but demands for air travel are expected to grow. In addition, the population of West Sussex and the wider South East is also expected to grow. Transport and other infrastructure will be required regardless of whether Gatwick Airport is expanded or not. The Airports Commission must consider the forecast in population growth in West Sussex and surrounding areas.
7. The Council's Environmental and Community Services Select Committee in September, 2013, debated the proposals by GAL to expand the Airport including the addition of a second runway and the possible implications for West Sussex and its communities. It provided GAL and the Airports Commission with questions, issues and concerns about the proposals. These later informed the work of a Member working group on Gatwick Airport. The list also provides the foundation on which this response is built.
8. In discharging its strategic role the County Council shall continue to maintain a constructive relationship with all partners, including Gatwick Airport Limited, to ensure that the economic effects of any decision about airport expansion are optimised and that all of the potential adverse effects for West Sussex communities are fully addressed.

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9. Having considered the materials published by the Airports Commission, West Sussex County Council notes that the Commission has stated that the proposals by GAL and those relating to Heathrow Airport have the potential to meet all the strategic objectives of the Airports Commission, as listed in the Commission's Consultation Document on its website.
10. This response focuses primarily on the Commission's assessment as it affects Gatwick Airport and the communities, businesses and environment of West Sussex.
11. The County Council's response does not set out a position on any of the three options presented by the Commission. It has been drafted on a "what if" basis; that is what if the Commission's recommendation to the Government is that increased runway capacity should be provided at Gatwick Airport. It is incumbent upon the County Council to plan for whatever eventuality arises from the Commission's work and the decisions by the Government in due course.
12. Should the Commission's recommendation be to provide increased runway capacity at Heathrow Airport rather than at Gatwick Airport, some of the County Council's comments will still apply to Gatwick Airport. There may be adverse effects for the economic opportunities for the area. It will be important to maintain and optimise the potential of Gatwick Airport in its current configuration (one runway and two terminals), as well as invest in the necessary infrastructure, to the benefit of local communities and businesses and to maintain an interest in the environmental and community concerns associated with the operation and development of the Airport. It is important that the methods of forecasting the future type and aviation traffic at Gatwick Airport are fully understood as the potential impacts of the Airport's expansion would be dependent upon this.
13. This section of the County Council's response addresses Questions 1 and 2 of the Airports Commission's Consultation Document.

### **Environment (countryside)**

14. Expansion of Gatwick Airport would involve direct land take on two local designated sites (Willoughby Fields and Rowley Wood) and would result in losses of Priority Habitats including deciduous and ancient woodland, traditional orchard, hedgerows and rivers and brooks. Significant local biodiversity enhancement opportunities exist in relation to the River Mole and its tributaries, in that whilst there will be some loss of natural sections of channel, other sections currently canalised and culverted can be re-naturalised.

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15. At this stage, neither GAL nor the Commission appears to have considered the wider environmental impacts of the expansion of the Airport and the development associated with and supporting it including new housing, commercial floorspace, road improvements and social and community infrastructure.

### **Improvement needed: making good any losses**

16. GAL must provide for, and fund, compensatory mitigation for direct habitat loss and its on-going management. This needs to include reinstating woodland and hedgerows, and adequately making up for the loss of ancient woodland. GAL must set out these measures which would be subject to agreement with the relevant statutory bodies.

### **Competition**

17. West Sussex County Council supports the intention, expressed by GAL and the Commission, that expansion of airport capacity in the South East should increase competition in the aviation market, especially between airports that serve London and the South East.

### **Improvement needed: explain the benefits of competition**

18. The Commission needs to explain the implications and benefits of increased competition in the aviation market, achieved through expansion of either Gatwick or Heathrow Airport, for passengers, the industry and communities local to the relevant airport. This includes the implications of additional connectivity and competition as well as the broader impacts on socio-economic and spatial development.
19. The proposal must set out clearly how the benefits of competition would be maximised and brought about, including for local communities and businesses.

### **Transport infrastructure - general**

20. As the Commission states, GAL's surface access strategy for a second runway is designed to meet the forecast demands of the expanded Airport. It also aims to be the best connected and accessible UK airport, delivering integrated surface transport with a choice of sustainable modes suited to the needs of the Airport's customers and employees. This will require improvements across a wide area, not limited to the roads immediately serving the Airport.
21. GAL intends to make best use of existing and committed infrastructure before considering new provision whilst demonstrating value for money. It aims to deliver the capacity required to allow safe, efficient and reliable journey times for all users of the transport network, not just aircraft passengers.

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22. In its public transport modelling work, GAL has set itself a target to accommodate 60% of passengers on public transport. In its road traffic modelling work, GAL has set itself a target to accommodate 50% of passengers on public transport. This deliberate difference, in GAL's view, builds-in a margin so that if the public transport infrastructure and services are not delivered on time, the road networks will be sufficient to cope with the additional traffic. This appears to be a reasonable approach.
23. GAL's objective would be to achieve a public transport mode share of 50% (compared to 43% in 2012) and improvements to road and public transport networks. Whilst this objective is laudable, it is challenging given well-established choices and patterns of behaviour. By 2050, the total number of passengers could be 95 million per year, which means that the number of passengers using public transport could be 47.5 million per year. The Commission needs to be confident that the scale of improved provision will accommodate the scale of passenger and employee movements and promote the necessary changes in behaviour.
24. Many of the investments and developments required to encourage and accommodate such an increase in public transport passengers have been identified in investment programmes for either road or rail. Much of the already committed and planned investment will be completed before the second runway is built, including measures for the M23, M25 and in Control Period 6 for rail infrastructure (see paragraphs 21, 26, 30-35, 48 and 49 of this response).
25. West Sussex County Council supports the intention that expansion of Gatwick Airport would, potentially, reduce the need for longer distance journeys to reach airports, especially for residents of the South East and the south coast. However, traffic generated by the expanded Airport could affect other non-Airport related journeys.

### **Improvement needed: strengthen commitments**

26. Any proposal supporting the Gatwick Airport option must confirm the commitment to the range of investments and improvements that will affect public transport, strategic highways and local highways including:-
- elements proposed by GAL to improve direct access into the Airport and north Crawley;
  - elements proposed by the Highways Agency/Department for Transport to increase the capacity of the M25 which must be in place by 2018;
  - improvements to junctions on the local highway network where higher passenger and employee numbers will contribute to increased congestion and delay;

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- investments in the Gatwick Gateway station improvement scheme (see paragraph 28);
- adding rail services between London and Gatwick Airport in the planned trial of smart ticketing;
- bringing forward Network Rail's study of further enhancement of the Brighton Main Line and delivery of those enhancements;
- M23 Smart Motorway and Gatwick Junctions included in the Highways Agency's pipeline schemes;
- the on-going Route Based Strategies (London Orbital and M23, and South Central); and
- the importance of the Gatwick Express and the need for rolling stock improvements included in the Thameslink Franchise.

### **Public transport**

27. GAL's submission was supported by an assessment of the impact on the rail network using the Department for Transport's strategic rail model. It demonstrated that by 2025 there will be significant capacity issues on the rail network, particularly on the Brighton Main Line corridor into London, even without Airport expansion.
28. The Government has allocated £50 million of public funds toward the improvement of Gatwick Airport Rail Station. Other parties, including GAL and Network Rail, have committed additional funds. Work on the upgrade is expected to start in 2017 and be completed in 2020. The investment will mean many improved features and services, a larger concourse area and more escalators and lifts. The improved station will handle the growth in passenger numbers brought about by the Airport's expansion.
29. For local buses, GAL and MetroBus have identified one priority as developing further the Fastway concept, supporting new services to areas where employees require access and increasing frequency and operating hours.

### **Improvement needed: rail**

30. The series of improvements to the rail corridor, principally aimed at removing bottlenecks, must be delivered in the rail industry's Control Period 6 (2019-24) to mitigate non-Airport related issues and accommodate expansion at Gatwick Airport. These improvements have been identified as part of Network Rail's long-term business planning process, and require Government commitment to fund or otherwise deliver them.
31. The improvements identified by GAL and Network Rail must become firm commitments in the relevant Control Periods 6 and 7 so that there is sufficient capacity to meet both background growth and the increase generated by the



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expansion of the Airport. The Commission needs to be confident that the improvements to Gatwick Airport's rail station will be sufficient to accommodate the increase in passenger traffic. In addition, the Government must commit to improvements to services and infrastructure on the Arun Valley Line. This will help residents and businesses from the South Coast and the West access Gatwick Airport.

32. Without these improvements, which are not yet commitments, the impacts on the rail network and train passengers of expanding Gatwick Airport would be wholly unacceptable. Investments in and improvements to rail infrastructure, rolling stock and services must meet the expectations of Airport users and staff as well as non-Airport rail passengers such as commuters.
33. Some of the improvements required and/or proposed to accommodate 50% of the Airport's passengers on public transport by 2050 are not currently funded commitments including those in Control Period 6. The Airports Commission's recommendations to the Government and its agencies must include the need to commit to the delivery of these improvements.
34. The Commission's analysis suggests that in the period 2040-50 there are likely to be issues relating to the capacity of the rail networks. These need to be considered by the Government and its agencies so that the necessary plans and works can be completed in a timely fashion to provide solutions to these forecast challenges.
35. The existing rail strategy for Gatwick Airport indicates support for the future development of the Brighton Main Line, including the measures proposed for Control Period 6. These improvements are required regardless of a second runway as they are needed to cater for background growth, that is traffic not related to the Airport. GAL states that expansion of Gatwick Airport will ensure higher off-peak and contra-peak demand, which will improve the value for money assessment for Control Period 6 scheme funding. If the Government allocates the additional runway to Gatwick Airport, the funding for improvements in Control Period 6 must be accelerated. The Commission must be confident that the infrastructure, stock and services would be able to cope with the number of rail passengers generated by the peak arrivals of international flights and the morning rail commuter traffic, especially if these coincide.

### **Improvement needed: bus and coach facilities**

36. GAL also proposes improvements to the Airport's facilities for people using buses and coaches in the event of the Airport being expanded. Whilst not part of the planned Gatwick Gateway, these improvements will be necessary to

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maintain and improve the share of passengers and employees that use public transport. Better facilities will make bus and coach use easier and more attractive for aircraft passengers and employees. This will be particularly important for new or improved coach services linking areas that are not served, or well-served, by rail. Examples might be towns in East Sussex and Kent.

### **Improvement needed: bus and coach routes**

37. If the Airport is expanded, GAL's strategy for local bus services would allow for access to all the Airport's terminals to support the services which are used by staff. For express coach services a new coach terminal at the Gatwick Gateway has been agreed with the main operators as the optimal solution as part of the expanded Airport. The strategy and the associated facilities must appear in the Commission's recommendations. The Commission must also set out the need for incentives to bus and coach operators to provide new services and the requirement for GAL and/or the Passenger Transport Levy (PTL) to pump prime such services.
38. New routes or enhancement to existing routes must prioritise the following areas:-
  - Sussex coastal towns
  - Kent;
  - Essex; and
  - south and east London.

### **Improvement needed: access issues and funding sources**

39. Improved access to the Airport will be required in the early hours of the day and late at night if employees and passengers are going to be persuaded to use public transport to reach the Airport. This includes bus, coach (particularly links with those areas not served by rail) and rail services. Such services must, where possible, be routed so as to avoid or minimise disturbance to residential areas overnight.
40. More facilities for cycle parking will be required at rail and bus stations in West Sussex serving Gatwick Airport to help encourage people (employees and passengers) to use sustainable modes of travel.
41. Where necessary, GAL must continue to enter into short-term pump-priming to set up new routes or support extensions to services. This could be achieved through the PTL. The PTL would approximately double in value with a second runway. The PTL is currently calculated based on the number car parking spaces provided at the Airport and secured through a legal agreement between the County Council, Crawley Borough Council and GAL. The

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agreement covers growth in air passenger numbers up to 40 million passengers per year. GAL must commit to the PTL beyond 40 million passengers per year.

42. The Local Highway Development Fund promised by GAL could contribute to the delivery of new or enhanced bus services, through discussion and agreement with the local authorities and service operators. These and other appropriate services must link communities with the Airport.
43. GAL sets out a headline target to increase the sustainable transport mode share for employees to 40% which, although challenging and perhaps optimistic, is supported in principle. The Airports Commission has not challenged the employee mode share assumption. Achieving this modal share would need a good public transport network the provision of which requires measures beyond the existing public transport schemes on the rail network and related to the Airport site.
44. Transport modelling by both GAL and the Airports Commission assume the employee mode share target would be achieved. However, if the target was not achieved, it would affect the surface access impact of the expanded Airport. There is, therefore, a need to develop more detailed proposals for the local public transport network away from the Airport site and demonstrate how these would be funded to support an increase in the sustainable transport mode share for employees. As these schemes are yet to be identified and their costs are currently unknown, it is suggested that the Local Highway Development Fund is increased in size to ensure that GAL is able to contribute towards these schemes as they are needed to ensure the mode share target is achieved.

### **Strategic highways**

45. In addition to maximising the number of travellers arriving at the Airport on public transport and promoting cycling and walking, GAL's surface access strategy aims to:-
  - accommodate the needs of users of transport networks other than aircraft passengers such as commuters, intercity travellers and freight;
  - enable access to the Airport from a wide catchment area;
  - improve the experience of passengers and the users of aviation; and
  - promote employment and economic growth in the local area and surrounding region.
46. GAL proposes support for its surface access strategy by reducing the ratio of car parking spaces to passenger numbers to try to divert passengers to public transport.

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47. Schemes that already have commitment will inject large additions to highway capacity. GAL and the Commission believe that committed strategic highway improvements, plus the proposed local capacity increases, would meet the scale of demand forecast. This position is supported by the Highways Agency.
48. GAL's submission was underpinned by an assessment of the impact on the highway network using the Highways Agency's validated transport model. The work demonstrates that, by 2025, without expansion of the Airport there will be capacity issues on the strategic road network. A number of schemes will be required to deliver additional capacity on the M25 and M23 through junction improvements and wider application of 'managed motorway' principles. In some cases, this includes schemes which the Government has already committed to deliver, including the managed motorway schemes for M25 junctions 5-7 and M23 junctions 8-10. These schemes and those identified by the Airports Commission will create additional capacity which will enable expansion at Gatwick Airport according to the Commission.
49. GAL's work indicates that, currently, 70% of Gatwick Airport-related traffic is from/to the north on the M23. Additional impacts are focussed on the A23 and the M23. Local road improvements and improvements to Junctions 9 and 9A of the M23 and the Spur Road will also be required (see the response to Question 8). GAL's work also shows that less than 25% of Gatwick Airport-related traffic (passengers and employees) will use local roads; most are and will be on the A/M23. Beyond 3km from the Airport, the figure is less than 15%.
50. GAL's analysis has looked at those junctions where demand is getting close to capacity. The impact of reaching, or exceeding, capacity is delay and variable journey times across a wide area and many junctions. Some of the forecast increase in delay and unreliable journey times is generated by background traffic growth without expanding the Airport.
51. Gatwick Airport handled 98,000 tonnes of cargo in 2012. GAL's forecasts show that with a second runway annual cargo throughput will grow to 1,070,000 tonnes by 2050. GAL's expectation is that the vast majority of this will be flown in the cargo-hold of long-haul passenger aircraft; GAL does not anticipate a significant operation of freighter aircraft.
52. To accommodate the growth in cargo, GAL's proposals for the two-runway Airport include the provision of a new cargo building. This will be provided adjacent to, and to the west of, the existing cargo building. The logistics centre, Gatwick Direct, which was launched in 2013, has consolidated the logistics freight traffic on the Airport. GAL proposes to maintain that approach for the second runway, aiming to reduce road traffic in and around the Airport.

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53. GAL has developed a surface access strategy and local roads mitigation that, it maintains, would allow for the extra traffic associated with runway expansion and additional cargo activity. GAL has allowed for a degree of consolidation with Gatwick Direct and a range of vehicles from 7.5 tonne to 30 tonne heavy good vehicles.

### **Improvement needed: road investment**

54. GAL's work suggests that the M25 would remain congested, mainly due to background growth which would be a far greater generator of traffic growth than the expanded Airport. The Department for Transport must lead and be open and transparent about the development of and commitment to a long-term plan for the M25.
55. The Commission, the Government and its agencies will have to consider how to plan for the capacities of the strategic highway and rail networks beyond 2040. This must provide for the likely increase in traffic from south and south west of the Airport. It must also provide for the increase in cargo transport to and from the Airport and how such movements might be handled to reduce disturbance to communities through 24-hour operations.
56. GAL has provided a strategy, commented on by the Airports Commission, that adds capacity to the main roads so that sensitive areas do not have an increase in Airport-related traffic with the additional runway. Further work by GAL is required on the likely effects of its strategy on rural roads.
57. The design of the new local roads strategy must include:-
- additional capacity for access to the North Terminal and the cargo area;
  - improvements to the Longbridge Roundabout (junction of the A23 and A217 south of Horley);
  - a dedicated route to the M23 at Junction 9, which will nearly double capacity;
  - diversion for the A23 that provides for an efficient route to Crawley that separates through traffic and Airport traffic.

### **Local highways**

58. The local highway network will require additional capacity and improvements due, in part, to the expansion of the Airport but also due to background growth.
59. GAL's proposal is underpinned by an assessment of the impact on the immediate highway network. This identified that some improvements will be needed to the immediate highway network. The modelling work indicates that a number of junctions and links would require work to increase the

capacity of the highways network. That work indicates that the increase in Airport-related traffic would be accompanied by potentially larger increases in background traffic growth.

### **Improvement needed: impact assessment and mitigation**

60. Should proposals for expansion at Gatwick Airport be taken forward, further work will be required by GAL in conjunction with West Sussex County Council to assess the impacts on local transport networks and identify mitigation measures to address these impacts on routes such as, but not limited to, the A23, A24, A264, A22 and A272.
61. Further work is required by GAL using transport modelling tools which are capable of representing the impacts on local highway and public transport networks across the area potentially affected by traffic relating to Gatwick Airport that is in terms of passenger, employee, cargo and service vehicles. This work will allow the identification of a package of improvements to the local transport networks which support the surface access strategy and mitigate the impacts of the Airport's expansion. GAL, the Government and its agencies must commit to the delivery of these improvements in a timely fashion, to meet the increased demand for travel (see the response to Question 8).

### **Improvement needed: sufficient funding to be committed and binding - need for a Local Highway Development Fund**

62. GAL has acknowledged that it should contribute to the improvement of junctions, commensurate with the impact of its expansion on those junctions. At this time, the exact scale, location and nature of the improvements are difficult to pinpoint, so a flexible long-term provision will be needed to manage the contributions by GAL, or its successors, to such improvements. The necessary arrangements must be established in an on-going legal agreement, including details of how such an arrangement would be administered and managed.
63. GAL has proposed the creation of a Local Highway Development Fund, to which GAL will allocate funds. The initial indication is that GAL will allocate £10 million to this Fund. The County Council believes that GAL's allocation must be greater than the sum initially suggested due to the potential number of improvements required across a wide area serving development over a period stretching to 2060. This includes measures to increase the sustainable transport modal share of employees and passengers. The Fund must remain open and available over the same period.

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64. GAL has employed consultants to undertake further analysis on those locations where strategic modelling indicated that demand resulting from a second runway may have a proportionate impact on local highways. This analysis is on-going and, where appropriate, is making use of the County Council's Strategic Transport Model which is considered to be an appropriate tool to assess the impacts of the Airport's expansion on the local highway network in West Sussex.
65. This work is expected to indicate the potential scale of improvements that may be necessary in the future to accommodate the Airport's expansion and background traffic growth. Further work will provide both indicative costs and outline designs for potential mitigation measures. The results of the analysis will set out the scale of traffic growth, the proportionate impact of Gatwick Airport-related traffic, potential solutions for mitigation and their costs. This can then be reviewed in the context of the proposal Local Highway Development Fund.
66. GAL's proposal would be improved if it committed a larger sum to a locally managed fund (the Local Highway Development Fund) to meet its contribution to necessary transport improvement schemes over the wide area affected by the traffic generated by expansion of the Airport and associated development (see the response to Question 8). It is not reasonable to expect local tax payers to meet the additional costs of infrastructure generated by the Airport's expansion.
67. As improvements will be needed, at least in part, to address issues caused by background traffic growth, there will also be a need for local investment in the transport network to be funded from a range of sources in addition to the proposed Local Highway Development Fund. Examples of this funding would include negotiated payments through Section 106 or Community Infrastructure Levy agreements. However, it is difficult to see how monies from these sources could be sufficiently coordinated to provide the necessary infrastructure and service improvements in a timely and joined-up fashion. The Commission must consider, and recommend on, how the Government and GAL will invest in the necessary improvements in appropriate timeframes.

### **Air quality**

68. Work by GAL states that the Airport's current performance does not breach air quality limits. It also states that developing a second runway would maintain air quality conditions at levels significantly within all national and EU mandatory standards and, therefore, it is unlikely that air quality would be a constraint on a second runway at Gatwick Airport.
69. Increased annual aircraft movements and surface access movements are expected to show some small changes to annual average air quality contours.



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GAL's consultants stated that the concentrations for NO<sub>2</sub>, PM10 and PM2.5 are predicted to remain well within the relevant air quality standards for these pollutants.

### **Improvement needed: scrutiny of mitigation proposals**

70. The Commission notes that the majority of environmental impacts, once mitigated, are not predicted to exceed domestic or international regulations, except in the case of air quality where further work is required to fully quantify the limited risks. The County Council agrees with the Commission in that this work needs to be explained and shared, including with the local authorities. There are, for example, likely to be effects on the air quality not just on and adjacent to the Airport but in towns and villages further afield due to aircraft and increased road traffic. That work must be subject to scrutiny by the relevant bodies including the local authorities and the Environment Agency.

### **Air noise**

71. For GAL's proposal, the geographical area affected by air noise and ground noise will extend when compared to the areas currently affected.
72. GAL's proposals show that the number of households and people exposed to air noise and the associated disturbance will increase over the existing levels. GAL expects that, with a new runway, flight paths would continue to avoid flying over the most densely populated towns of Crawley, East Grinstead, Horley and Horsham.
73. As Leq noise contours relate to summer noise, there is likely to be a slight increase to the size of the 57 Leq contour due to increases in the number of summer flights.
74. As Lden contours are based on annual measures with evening and night elements, they are likely to be larger, especially at each end (east and west) of the contours. The largest increases would relate to Lden contours, due to the effects of peak-spreading and extra weighting in this measure for night flights.
75. Gatwick Airport and NATS have deferred submitting any proposals to change local airspace until more detailed work is done to better understand the available options and the next steps. In addition, NATS also agreed to delay implementing any changes to airspace above 4000 feet. This is a deferral or an extension of the timeline, not a cancellation of the process altogether. The Civil Aviation Authority's Future Airspace Strategy requires that changes to local airspace are implemented by 2020.



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76. During the recent ADNID trial the temporary change in flight paths affected a significant number of residents and some businesses. It is clear that residents are already suffering disturbance as a result of air traffic and the recent changes in flight paths. Communities feel that there is disturbance created by over flights, including in areas outside the 54Leq contour.

### **Improvement needed: mitigation of disturbance**

77. GAL's proposal suggests that improvements in aircraft technology and design would benefit communities and people in terms of reduced noise. It also set out proposals for mitigating the effects of disturbance from air noise. GAL needs to set out how the use of runways and flight paths will provide respite for these communities.
78. New buildings in the north east sector of Crawley and elsewhere must have sound insulation as part of the relevant planning permission.
79. GAL must do as much as possible to advise communities potentially affected by air and ground noise of the likely effects on their quality of life. GAL must also take steps to reduce the impact of aircraft noise on local residents. This must include:-
- responding constructively to the feedback received from local consultations;
  - undertaking detailed analysis work on final route options;
  - undertaking further work to introduce more respite for residents most affected by noise (including from aircraft between 4000 and 7000 feet); and
  - identifying how GAL can engage better on any new flight change options by developing a more effective programme of communication and consultation.
80. The Commission must recommend that the Government needs to work with airport operators to consider how best to mitigate and compensate the effects of the Civil Aviation Authority's Future Airspace Strategy including PRNAV and the narrowing of flight paths. The Commission should also set out its ideas and recommendations (as mentioned in its interim report) relating to the establishment of an independent aviation noise authority which the County Council would commend.

### **Ground noise**

81. Looking at ground noise, whilst GAL accepts that its proposal would generate greater noise effects, its work (as submitted to the Commission) suggests that with appropriate mitigation there is no reason to believe that the new runway and its operation would be unacceptable in terms of ground noise impact.

82. The geographical areas affected by ground noise would extend further from two runways than they do from the existing single runway. Ground noise by way of road traffic and aircraft on the ground are expected to increase. Levels of aircraft-related ground noise approaching those experienced on a busy day will be experienced more frequently at other times.
83. Unlike air noise, where assessment and modelling of the contours is based on predicted operations over the length of the summer season, the assessment of ground noise (from aircraft on the ground) is based on the schedule of operations for a busy summer day. GAL's work suggests that there would be some locations (mainly to the north of the Airport) where aircraft ground noise would be lower with a second runway (compared to if the Airport was to remain with a single runway) and some locations (mainly to the south) where ground noise levels would increase.
84. Handling 95 million passengers per year would mean that the Airport would be busier during the day and evening periods throughout the year. Higher noise levels would prevail for longer periods during the year as a result of reduced annual fluctuating traffic levels.
85. To maximise their benefit the bunds/wall have been designed to be as large and as close to the sources as possible in each individual case, taking into account runway clearances and land take requirements. Practical experience shows that similar bunds can achieve attenuation of up to 10 dB or more where both source and receiver are relatively close to the bund in comparison to the height of the bund. The benefits then reduce at increasing distances where sound levels are lower.

### **Improvement needed: noise barriers**

86. The Commission needs to recommend that GAL must deliver on its proposal to construct acoustic bunds and a noise wall around aircraft operating areas wherever there would otherwise be an increase in ground noise. The Commission needs to be confident that these measures would reduce the effects of noise generated by on-site aircraft maintenance.

### **Home noise insulation measures**

87. GAL has expanded its noise insulation scheme. The noise threshold for the scheme has been reduced, and the boundary line drawn flexibly to ensure that entire communities are included. The boundary line has also been extended along the flight paths by 15km east and west of the Airport. Eligible homes can apply for up to £3,000 towards double glazing for their windows and doors and loft insulation.

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- 88. GAL states that, should the new runway be provided at Gatwick Airport, the scheme would be extended to cover the area related to the new runway, including a flexibly drawn boundary so that whole streets and communities would be included.
- 89. The noise insulation scheme in addition to GAL's Council Tax Initiative which would see those homes most affected by noise from a second runway receiving annual compensation equivalent to Band A Council Tax (currently £1,000) if and when the additional runway becomes operational.

### **Improvement needed: broader provision of the scheme**

- 90. The noise insulation scheme must be accessible, appropriate and realistic in terms of the geographic extent of the schemes application reflecting any changes to the existing flight paths, new flight paths and the associated noise shadows. GAL must also make the scheme available to businesses that are noise sensitive to meet the cost of the necessary measures.
- 91. GAL has not set out the level of interior noise it seeks to achieve in homes through the installation of measures, such as double glazing, to reduce the effects of aircraft noise.
- 92. GAL's annual compensation equivalent to Band A Council Tax must be tax exempt or net of tax.

### **Employment and housing**

#### Types of employment opportunities

- 93. It is clear that a second runway at the Airport would generate economic benefits. Whilst additional runway capacity in the South East would benefit the national and regional economies, growth of Gatwick Airport would benefit the West Sussex economy and local communities.
- 94. Expansion of the Airport would generate employment during the construction of new or enhanced Airport facilities, and the construction of associated infrastructure. Once the Airport has been expanded, additional employment would be generated on the Airport and off the Airport. Airport activity generates employment directly, indirectly and through induced activity.
- 95. There is a fourth element of employment generation - catalytic employment. This is due to companies choosing to locate or invest due to the presence of an Airport or investment on a large scale. Catalytic employment can include job creation across a very wide area.

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96. A company might choose to locate near the Airport to either have easy access to flights (for customers, staff or goods), or to provide services to other companies that are near the Airport. Equally, it might choose to invest in a city within a reasonable distance of a large airport, rather than in another country. This might be due to the economic significance of the Airport, good surface access and the specific influence of international aviation. Companies might be drawn to, or expand in, London and the South East because of the access it offers to markets, including the international markets served by the Airport. In addition, some activities might be drawn to the growing aviation presence of the expanding Airport. In this context, the South East spreads from Oxford to the Kent coast, including Hampshire, the Isle of Wight and Berkshire for example.
97. Work for GAL and the Airports Commission suggested that up to 100,000 jobs could be created in London and the South East. Similar figures were published for the wider job creation generated by expanding Heathrow Airport. The similarity of the figures reflects the expected employment and economic growth as a result of increasing airport capacity, investment and economic activity, rather than purely as a result of increased passenger traffic in a particular airport.
98. These catalytic effects are distinct from those arising from employment that can be traced back to the operation of the Airport. GAL's forecasts of direct and in-direct employment are specifically Airport-related. GAL's forecasts of induced employment reflect the jobs that the direct and indirect workforce would create through the purchase of goods and services in the local economy.
99. The influence of the Airport, in its existing configuration, on the local economy and its implications for housing are already reflected in the overall employment, population and household forecasts for the area. These inform policy making, especially in land use planning. Through population forecasting the Airport's influence is also reflected in other forms of business and service planning.

### Forecasting growth and housing demand – need for caution

100. GAL's analysis and that of the Commission re the additional workforce, households and housing demand was compared with the workforce required for the existing runway operating at full capacity. The forecasts of additional workforce, households and housing demand were based on the Airport's current configuration at full capacity.
101. GAL's forecasting followed a general approach to direct and indirect employment in the year of opening the second runway. It assumed that employment would grow in line with airport passenger traffic growth between

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2012 and the relevant forecast year with an allowance for growth in productivity, either low or high. Induced employment is estimated using an employment multiplier. The forecasts suggest that the second runway could generate an additional 22,000 Airport-related jobs by 2050/1.

102. Due to the nature of forecasting, the position beyond 2040/1 should be treated with caution.
103. The employment forecasts relating to Gatwick Airport will have to be considered as part of the employment forecasts for the wider area and expectations of the future rates of economic activity. This work will inform the local planning authorities' work around workforce, housing demand and land supply. This is long-term work, through iterations of forecasts and local plan reviews. Should Gatwick Airport be expanded, it will take time to achieve the physical expansion and the growth in flights and passenger numbers.
104. Expansion of the Airport will give rise to increased demand for labour. GAL's work focused on a primary Study Area based on whole local authority areas within which at least 1% of the 2012 Gatwick Airport workforce lives. This area provides the main catchment for the Airport's workforce. The area comprises: Crawley; Reigate and Banstead; Mid Sussex; Horsham; Brighton and Hove; Croydon; Wealden; Tandridge; Lewes; Arun; Mole Valley; Adur; Worthing; and Eastbourne.

### Assumptions applied

105. GAL's work states that the additional labour demand could result in immigration to the area which would generate a demand for additional housing. In its work, unlike that of the Commission, GAL applied a series of assumptions to provide an understanding of the nature of the scale of demand for additional housing. The estimate of additional demand fell in the range of housing need forecast by the Commission as part of its analysis of GAL's proposal. The assumptions used in GAL's work included:-
- not all of the Airport-related jobs in the study will be filled by residents of the Study Area; some people will commute from further afield;
  - the second runway would provide opportunities for people who would otherwise be unemployed. The number will depend on the number and characteristics of the unemployed, the availability of training and other opportunities in the area;
  - recruitment from increased activity rates. More local jobs would have the potential to encourage more people to seek employment; and
  - additional employment in the area might attract people who are currently commuting to jobs elsewhere to take up local employment.

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106. GAL's estimates of the contributions of these factors suggested that 3,000 people could be recruited from the Study Area by 2050/1. GAL's work suggested the maximum estimates of in-migrant Airport workers related to the second runway would be 14,900.

### Housing estimates

107. The number of additional households would, GAL stated, be less than the number of in-migrant workers. This was because there may be more than one economically active worker per household. The maximum number of additional households in the Study Area was forecast to be 9,300 by 2050/1.
108. The figure of 9,300 households by 2050/1 was based on unconstrained population and households projections (projections which do not take into account the effect of future housing growth or policies relating to housing development).
109. GAL suggests that this housing demand would be limited and relatively small when compared to the forecast overall level of housing demand in the area up to 2050.
110. GAL stated that the overall impact of a second runway on the labour and housing markets of the overall Study Area would be likely to be limited. This was in comparison to the scale of employment and housing that would be expected to support the Airport operating at full capacity with one runway and two terminals.

### **Improvement needed: use of the planning system – timely use of local plans**

111. The Commission needs to be confident that the forecast economic benefits of all three options are realistic and achievable. In relation to the catalytic effects associated with the expansion of Gatwick Airport, GAL states that the wider economic effects of a second runway could be expected to continue supporting the economic success of the Gatwick Diamond, the Districts that are home to the majority of the workforce and beyond. GAL also states that the economic effects of the second runway could support regeneration objectives in accessible areas such as parts of the south coast and London. The management of these wider effects, and the associated development pressures, would be best addressed in the context of the statutory planning system through which growth pressures associated with the Airport's expansion would have to be considered and, if appropriate, planned for. The Government will be expected to publish a National Policy Statement on Aviation which should help lead the planning process.
112. The timescales involved would allow local authorities and other parties opportunities to respond to the issues arising from an expanded Airport and,

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the wider economic context through, for example, land use planning and local plan reviews. Should the expansion of the Airport generate business activity not related to the Airport, there will be policy choices for the local authorities as to whether they wish to plan for increased floorspace.

113. The local authorities will have to consider how the impacts might be planned for and accommodated through future iterations of local plans. Local authorities will have to consider land use, housing supply, economic development, infrastructure, planning and service provision.
114. The Government, GAL, local authorities and other partners should be required to consider the effects of Airport expansion on communities and infrastructure (such as schools, healthcare facilities and utilities), and how direct and indirect effects of the expansion might best be mitigated. There would be an opportunity to give greater weight to the acceptability of the proposed expansion to communities.
115. The response to Question 8 identifies the range of supporting infrastructure that will be required across the wider area that will accommodate the growth associated with the expansion of the Airport.
116. The Commission needs to be confident in its understanding of the implications of airport expansion in terms of housing and other associated developments. The range of housing forecasts provided by the Commission is very large due to the range of initial scenarios and the high level nature of the work on housing need. GAL's work is more detailed and closely related to the operating model it foresees in terms of the larger Airport. GAL's housing forecasts fall in the midst of those provided by the Commission. Housing developments will be subject to the usual planning processes of local plans and development management, within the policy framework of the National Planning Policy Framework and the National Policy Statement on Aviation. These will bring with them opportunities for negotiating contributions to be fully explored in the delivery and funding of services and facilities such as school places and health care. However, if the provision of facilities, infrastructure and services is reliant upon individual applications, no matter what scale, it could be disjointed, poorly coordinated and often lagging behind the development. In looking at the cumulative effects of development, the provision of facilities, infrastructure and services needs coordination, investment and timely delivery.

### **Improvement needed: obligation to work with local planning authorities**

117. The land use planning system may not be capable of taking full account of the cumulative effects of large-scale developments spread over a wide area. GAL, the Government and other parties need to work with the local housing and



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planning authorities to establish a better and more detailed understanding of the likely implications of these and Airport expansion in terms of:-

- job creation;
- employment markets;
- household forecasts;
- housing demand;
- land and housing supply;
- infrastructure, services and facilities to support local communities including healthcare, schools, leisure facilities (see the response to Question 8);
- the availability of land for housing;
- meeting the cost of local infrastructure; and
- environmental impacts, particularly air quality and noise.

### **Blight**

118. As a consequence of considering options for increasing airport capacity, property potentially affected by proposals might be blighted. It is important that, in expanding on outline proposals, GAL sets out the blight relief schemes that would be made available should the proposal be taken up.

119. GAL has pledged that if the Airport is expanded, it would make £14 million available through its Home Owners Support Scheme. This would buy any homes that would be subject to high levels of aircraft noise — above a set noise level — under the new plans. The voluntary scheme means that people would not have to wait until any new development has opened for any support or assistance against the risk of blight, as they would usually have to if GAL only fulfilled its legal obligations.

### **Improvement needed: better planning and communication**

120. Once the Airports Commission has submitted its final report to the Government in 2015, the Government must act to expedite a decision as to where additional capacity should be provided. This will serve to eliminate the threat of blight at those locations where the Government does not support expansion.

121. If the Government allocates the new runway to Gatwick Airport, airport operators and developers must ensure that blight relief schemes are accessible and appropriate and there must be a requirement that they are defined, communicated and implemented promptly.

### **Land take**



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122. The land required for the construction of a second runway has been formally safeguarded since 2003. There are a number of residential, commercial and other properties that would be affected by the expansion of the Airport. The Commission states that this includes 168 homes and commercial premises possibly hosting up to 286 businesses. This includes premises at City Place, Lowfield Heath and up to 12% of the employment floorspace on the northern edge of the thriving Manor Royal Business Improvement District.

### **Improvement needed: communication and joint working**

123. GAL must continue to provide home, business and land owners with reassurance as to the future process and a point of contact to discuss their concerns and seek advice. This includes the dedicated telephone line and e-mail address through which landowners and businesses can obtain advice.

124. GAL must work with the local authorities to develop a strategy on options for the relocation of businesses. This must establish whether business could be relocated to safeguarded land that will not be needed by GAL, possibly east of the railway line. This might require the intensification of other land uses, such as the decking of car parking.

125. GAL must aim to work with the relevant local authorities to retain as many of the relocated companies in the local area, and certainly in West Sussex, as possible. In this way, the local authorities, companies and representative groups must be able to address the implications of the Airport's expansion whilst maintaining the economic benefits of the expansion.

### **Improvement needed: clarity on phasing and compensation**

126. GAL must provide a phased programme for the development of the expanded Airport including the second runway and highway infrastructure in conjunction with the County Council and the Department for Transport. That must indicate at what stage in that programme GAL will expect to redevelop areas currently outside the Airport's boundary such as parts of Manor Royal and other business premises.

127. GAL needs to explain how businesses operating from those premises will be relocated and compensated for disruption to their business.

### **Improvement needed: community buildings**

128. GAL stated that within the safeguarded area, some community buildings could be affected by the construction of the second runway. GAL needs to work with affected people and organisations to plan appropriate mitigation and relocation arrangements. GAL needs to explain how these community buildings will be

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replaced elsewhere, and the related organisations compensated for the disruption caused to their activities.

129. GAL must also explain what implications its proposals have for land beyond the existing safeguarded area (such as the North East Sector), and what effect development within the Airport might have on adjacent communities. This includes appropriate provision for the relocated Hindu temple, playing fields, nurseries, Crawley Rugby Club and church and graveyard at Lowfield Heath

### **Pledges - Improvement needed: binding agreements**

130. The Commission needs to advise the Government on how the pledges made by GAL must be secured and maintained if the Airport is sold. The Government must build the pledges and any other conditions, as legally binding agreements, into the National Policy Statement.

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**Which of the shortlisted runway options, if any, do your comment(s) relate to?**  
(Tick all that apply.)

- ☒ Gatwick Second Runway
- ☐ Heathrow North West Runway
- ☐ Heathrow Extended Northern Runway

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### Your views and conclusions on the three short-listed options

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**Q2 Do you have any suggestions for how the short-listed options could be improved, i.e. their benefits enhanced or negative impacts mitigated?**

The options and their impacts are summarised in Section 3 of the consultation document.

*If you have any comments, please provide them below. If you have no comments, please go to the next question.*

Please see the County Council's response to Question 1 above.

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**Which of the shortlisted runway options, if any, do your comment(s) relate to?**  
(Tick all that apply.)

- ☒ Gatwick Second Runway
- ☐ Heathrow North West Runway
- ☐ Heathrow Extended Northern Runway

**Next**

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### Your views on the Commission's appraisal and overall approach

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#### **Q3 Do you have any comments on how the Commission has carried out its appraisal?**

The appraisal process is summarised in Section 2 of the consultation document.

Please limit your answer to comments about the approach to the appraisal. You will have the opportunity to comment on the results in another question.

If you have comments about how the Commission has appraised specific topics, constructed its sustainability appraisal or constructed its business case, you may wish to provide this information in Q5, Q6 and Q7 respectively, rather than in this question.

*If you have any comments, please provide them below. If you have no comments, please go to the next question.*

This section of the County Council's response addresses Questions 3 and 4 of the Airports Commission's Consultation Document.

#### **Different approaches and assumptions**

- 131. The Commission needs to deal with the inherent risks that accompany the number of different consultants used in the work by the promoters of the three options, plus its own suite of consultants, and the different approaches by each to forecasting, analysing and predicting critically important factors that affect how the options are analysed and compared.
- 132. There is a strong risk that the Commission and respondents to its consultation are not comparing on a like for like basis. There is a risk of this being further compounded when different approaches and assumptions are used in assessment against each of the five forecasting scenarios.
- 133. The eventual report and recommendations must explain how the various competing assumptions have been dealt with.

#### **Forecasting scenarios: need for clarity**

- 134. Whilst the Commission has to acknowledge and understand that there is more than one view of the future, the use of five separate and distinct forecast scenarios of the future demand for aviation might serve to confuse and possibly mislead the debate.
- 135. Whilst each scenario reflects different potential outcomes, it is unlikely that the global economy and international aviation will fall in line with just one of

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the scenarios. It is, perhaps, much more likely that the future demand for aviation will incorporate elements of two or more scenarios. To use each in isolation could possibly mislead the consideration of the three options for providing additional runway capacity.

136. This is thrown into particular focus when the Commission looks to the future operation of Gatwick and Heathrow Airports. Assumptions are made that suggest the operating model of each Airport will be fundamentally the same up to and beyond 2040/50 as it is today. However, there is no guarantee that will be the case. Indeed, each Airport might well change its operating model to accommodate a wider range of aircraft, flight destinations, services and passenger types in accommodating more air traffic movements and passengers.
137. The basis on which the Commission concluded that there will be a need for additional runway capacity by 2030 did not dictate the model of airport operation, yet the assessments now published by the Commission seem to lock each Airport into its existing operating model. This results in inappropriate forecasts of matters such as passenger numbers, ratios of employees to passengers, national economic benefit and local economic benefit through indirect and induced employment. For example, it is not clear how increasing passenger throughput in the South East, through whichever airport location, could have such significantly different contributions, between airport locations, to the national and local economies when the increased number of passengers is of the same scale.
138. It will assist agencies needing to act on whatever eventual decision is made if these forecasts and models are rationalised.

### **Forecasts of housing need: need for more certainty**

139. Due, in part, to the use of different assumptions and methodologies, the Commission's work reaches a different view on housing need to that of GAL. The Commission's work is less detailed than that by GAL. For example, the Commission's work does not look at the potential effects of changing employment and commuting patterns or the extent to which an increase in jobs results in more people returning to the workforce or to a reduction in out-commuting.
140. This provides the Commission with some degree of consistency between the assessments of the three options. It does not suggest that the work of any one of the promoters is in any way incorrect but the final recommendation will need to be based on a more detailed and evidence-based projection.
141. It does, however, need to be reconciled as the Government, local authorities and other partners could not use the Commission's as the basis for future

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planning. The Commission and the Government need to revisit the range and scale of the forecasts with a view to reconciling the differences and narrowing the range of possible outcomes.

### **Housing delivery and development: accuracy and realism needed**

142. The Commission's consultation material makes somewhat sweeping statements about the potential delivery of new homes. It suggests that the additional housing demand generated by the expansion of the Airport could be divided evenly between the local authorities in the area and implies that the delivery of these additional homes would not be difficult. Even as an illustration of how the homes might be distributed, the Commission's approach is crude. These comments are not helpful and do not reflect local circumstances or the requirements and operation of the planning regimes.
143. If the Government decides that additional airport capacity should be provided at Gatwick Airport, there would be a range of implications for West Sussex communities, businesses and environments. Planning for the Airport-related population increase, in addition to the expected and forecast background growth in population, will be much more challenging than the Commission seems to suggest.
144. The area around Gatwick Airport, from where much of the existing Airport-related workforce is drawn, already has a significant degree of unmet housing need. Whilst some of the Airport's future workforce might already live in the area, or will be born there, additional households are predicted to migrate to the area, thus adding to the existing demand for housing and supporting services and infrastructure.
145. It seems that the Commission has misunderstood the land use implications of the Airport's expansion. For example, reference by the Commission to the potential use of land north of Crawley for further growth in the long-term is mistaken. That land, most of which is in the Safeguarded Area, would be utilised by GAL in expanding the Airport. The southern boundary of the expanded Airport would reach the northern edge of the town, made up primarily of residential areas or open space serving those residential areas.
146. The Commission must re-examine this situation before drawing any conclusions and making recommendations on land use.

### **Timescales: need for housing will be over a longer period**

147. The Commission sets out the employment and housing implications for each option up to 2030, with indications of wider economic and employment growth beyond that. This timeframe appears to be driven by the forecast growth in jobs at Heathrow Airport where peak employment is expected in 2030.

148. Due to the available capacity at Gatwick Airport, however, the increase in passenger numbers and employment would occur more steadily up to 2050 when it would reach peak employment. This is not reflected in the Commission's consultation material. As a result, the Commission implies in the Gatwick Airport case that any housing to accommodate new households in Airport-related employment would have to be built by 2030, whereas it would be more likely to be built over the longer period up to 2050. This allows for the planning regime to consider and respond to the need for the housing and associated services and infrastructure, if that need arises.

### **Employment growth or lack: assumptions and model to be clearer**

149. The Commission has sought a way of assessing the likely effects of an additional runway on the wider economy of London and the South East, a topic on which there are no agreed methods of accurate forecasting.

150. The Commission has introduced an alternative forecast which includes the impacts of each option, estimating that:-

- a second runway at Gatwick Airport could create 49,000 jobs under the assessment of need scenario by 2050, rising to 90,000 by 2060;
- the Heathrow Airport Extended Northern Runway could create 164,200 jobs under the assessment of need scenario by 2050; and
- the Heathrow Airport North West Runway could create 179,600 jobs under the assessment of need scenario by 2050.

151. The methodology behind these forecasts is not clear. Nor are the reasons for the significant differences in the forecasts when they relate to growth in passenger numbers of a similar scale through airports in the South East.

152. The Commission must make clear the methodology used, the assumptions applied and the starting point for assessing each option and whether its assumptions used the existing or potential future operating models of each airport – Gatwick and Heathrow.

153. There appears to have been no assessment of the potential impact on employment and the economy of the area around Gatwick Airport of a decision to provide additional runway capacity at Heathrow Airport. That assessment must be undertaken prior to a final recommendation.

### **Infrastructure: improvements needed earlier and committed to**

154. The Commission has assessed the on- and off-site infrastructure that would be required to create and serve the expanded Airport. It has also commented on the off-site infrastructure that would be required. However, the scale of

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growth brought about by the Airport's expansion, both directly and indirectly, would impose demands on facilities, infrastructure and services to greater extent and sooner than forecast growth in population, households and the economy.

155. Meeting the diverse needs of the communities and businesses of West Sussex is one of the key aims of the local authorities. This includes: meeting the needs of people for homes, jobs, facilities and services; the needs of local businesses and of the local economy; and the needs of people and businesses to travel and to move goods.
156. The provision of new and improved infrastructure (including facilities and services) which meet the needs of the communities of West Sussex is particularly important. The Commission must recommend that local authorities, together with service providers and the Government, need to identify any existing or potential deficiencies in infrastructure provision, including lack of capacity and under-provision, which need to be made good or overcome.
157. New development should contribute towards new or improved infrastructure. Ordinarily, such development would only be expected to meet the needs it generates and not to meet existing shortfalls or deficiencies. In this way, the expansion of Gatwick Airport must pay its way. However, new development, especially on the scale generated by the Airport's expansion, may lead to the need for the developer and others, including the Government, to contribute towards new facilities, infrastructure and services. This could include improvements to existing inadequate infrastructure to avoid worsening an already unsatisfactory situation. Consideration will need to be given to the cumulative impact of all new development on infrastructure.
158. The Commission, through its recommendations, must identify the range of supporting infrastructure that will be required across the wider area that will accommodate the growth associated with the expansion of the Airport. The infrastructure requirements across the area surrounding the Airport, identified by the County Council, are listed in response to Question 8.
159. In turn, if the decision is made to expand Gatwick Airport, the Government must commit, in the relevant National Policy Statement, to the provision of supporting infrastructure across the wider area so that the needs of existing and future communities and businesses are met in a timely and effective fashion.

### **Surface access: rule for land use alongside roads to be more flexible**

160. The Commission has used the submission by GAL, along with material and evidence from bodies such as Network Rail and the Highways Agency. In



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assessing the implementation of GAL's scheme, the Commission appears to have applied a rule requiring each new road corridor to be accompanied by cleared land 100 metres each side of the carriageway.

161. This seems to be an inappropriate requirement. The distance of property and activities away from a road will vary according to the nature of the road, the type of activity and how the land between the two is landscaped, developed or used. The knock-on effects of such a blanket approach is that properties less than 100 metres from a realigned minor road would have to be purchased, the residents or occupants relocated, and the property destroyed.

### **Costs: Airport owner to meet the costs of additional requirements**

162. In assessing the surface access arrangements to serve an expanded Gatwick Airport, the Commission sets out a costed list of requirements. Whilst the assessment identifies a similar list of requirements as GAL, it seems somewhat confused as to the source of funding for the improvements.
163. Some of the items which GAL has proposed to provide and pay for also appear in the Commission's list of additional off-site improvements, suggesting that the cost of these improvements would be additional to the cost of expanding the Airport possibly imposing demands on the public purse. It is important that the cost of providing the items proposed by GAL is met by GAL, or subsequent owners of Gatwick Airport, rather than the public purse.
164. The Commission must revisit the lists and correct any double-counting as well as adjusting the suggested totals of private and public funding.

**Next**

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### Your views on the Commission's appraisal and overall approach

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**Q4 In your view, are there any relevant factors that have not been fully addressed by the Commission to date?**

*If you have any comments, please provide them below. If you have no comments, please go to the next question.*

Please see the County Council's response to Question 3 above.

**Next**

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### Your views on specific areas of the Commission's appraisal

---

**Q5 Do you wish to comment on how the Commission has appraised specific topics (as defined by the Commission's 16 appraisal modules), including methodology and results?**

These are:

- Strategic fit
- Economy impacts
- Local economy impacts
- Surface access
- Noise
- Air quality
- Biodiversity
- Carbon
- Water and flood risk
- Place
- Quality of life
- Community
- Cost and commercial viability
- Operational efficiency
- Operational risk
- Delivery

☒ Yes

**Next**

☐ No

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### Your views on specific areas of the Commission's appraisal

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**Which appraisal modules would you like to comment on? Please tick all that apply.**

- |   |  |
|---|--|
| <input checked="" type="checkbox"/> Strategic fit                 | <input checked="" type="checkbox"/> Economy impacts        |
| <input checked="" type="checkbox"/> Local economy impacts         | <input type="checkbox"/> Surface access                    |
| <input type="checkbox"/> Noise                                    | <input type="checkbox"/> Air quality                       |
| <input type="checkbox"/> Biodiversity                             | <input type="checkbox"/> Carbon                            |
| <input type="checkbox"/> Water and flood risk                     | <input type="checkbox"/> Place                             |
| <input type="checkbox"/> Quality of life                          | <input type="checkbox"/> Community                         |
| <input checked="" type="checkbox"/> Cost and commercial viability | <input checked="" type="checkbox"/> Operational efficiency |
| <input type="checkbox"/> Operational risk                         | <input type="checkbox"/> Delivery                          |

Please enter your comments on the selected appraisal modules below. If you need additional room please attach further comments on separate pages, clearly noting the title of the appraisal module and shortlisted runway your comments refer to.

165. This section of the County Council's response addresses Questions 5, 6 and 7 of the Airports Commission's Consultation Document.

#### **Modelling to be more accurate**

166. The methodologies used by the Commission in its appraisal seem reasonable. However, a fundamental element of the Commission's work is of concern. The Commission has projected future use of the expanded Airport based on the current operating model of that Airport. However, it is very likely that the operating models, especially that for Gatwick Airport, will change.
167. Projecting the future effects of an expanded Airport based on its current operating model ignores the fact that the model is currently changing and will continue to change.
168. GAL proposes more or less doubling its capacity so looking at the Commission's own forecast scenarios indicates that the operating model, especially for Gatwick Airport, has to change.

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169. This raises questions about the accuracy and appropriateness of the subsequent appraisal findings. The Commission must revisit its assessment to take fully into account GAL's proposed operating model for the larger Airport including a wider range of airlines, passengers and cargo. This must be reflected in the assessment of impacts on the local and national economies and other associated assessments.

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**Which of the shortlisted runway options, if any, do your comment(s) relate to?**  
(Tick all that apply.)

☒ **Gatwick Second Runway**

☐ **Heathrow North West Runway**

☐ **Heathrow Extended Northern Runway**

**Next**

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### Your views on specific areas of the Commission's appraisal

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**Q6 Do you have any comments on the Commission's sustainability assessments, including methodology and results?**

*If you have any comments, please provide them below. If you have no comments, please go to the next question.*

Please see the County Council's response to Question 5 above.

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**Which of the shortlisted runway options, if any, do your comment(s) relate to?**  
(Tick all that apply.)

- ☒ Gatwick Second Runway
- ☐ Heathrow North West Runway
- ☐ Heathrow Extended Northern Runway

**Next**

## Consultation Response Form



### Your views on specific areas of the Commission's appraisal

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**Q7 Do you have any comments on the Commission's business cases, including methodology and results?**

*If you have any comments, please provide them below. If you have no comments, please go to the next question.*

Please see the County Council's response to Question 5 above.

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**Which of the shortlisted runway options, if any, do your comment(s) relate to? (Tick all that apply.)**

- ☒ Gatwick Second Runway
- ☐ Heathrow North West Runway
- ☐ Heathrow Extended Northern Runway

**Next**

## Consultation Response Form



### Any further comments

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#### **Q8 Do you have any other comments?**

*If you have any comments, please provide them below. If you have no comments, please go to the next question.*

#### **Initial list of infrastructure requirements if the additional runway is allocated to Gatwick Airport**

170. The County Council has identified an initial list of supporting infrastructure that would be required across the wider area to accommodate the growth associated with the expansion of Gatwick Airport. Further work is required to establish the full extent of the necessary infrastructure to support the Airport's expansion and local communities. The County Council and relevant partners must be engaged in the development of the plans to deliver the necessary infrastructure.
171. Some of the infrastructure requirements must be provided by GAL, whilst some should be provided through public investment by the Government. The need to provide this infrastructure should be incorporated into the relevant National Policy Statement.
172. The Commission must advise the Government on how the pledges made by GAL must be secured, particularly if the Airport is sold. The Government must build the pledges, as legally binding agreements, into the National Policy Statement. The County Council and other local partners must be involved in the negotiation of such agreements.

#### **Highways infrastructure - The following will be required:**

- i. transport infrastructure improvements required to facilitate the expansion of the Airport including those needed to accommodate 50% of the Airport's passengers on public transport by 2050 as well as the strategic road improvements.
- ii. investment in the A/M23 south of Gatwick Airport with improved links to major towns including Burgess Hill and Haywards Heath.
- iii. a long-term commitment by GAL to pay its contribution towards improving the local road network. This includes increasing its pledge towards the Local Highway Development Fund to £30 million or more rather than £10 million for local road improvements to address bottlenecks that might otherwise hinder the effective and efficient operation of Gatwick Airport and the wider



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economic growth that its expansion will bring about. Further work is required to identify the range of improvements that might be necessary and a broad indication of the total funding requirement and how this might be managed to accommodate the effects of inflation. The Fund must be open and accessible up to 2060. The Fund must be administered and managed through a joint agreement between GAL (and subsequent owners of the Airport) and West Sussex County Council.

- iv. investment to improve access to rural and coastal areas so that the benefits of the Airport's expansion are spread to communities in need of economic growth and wider employment opportunities.
- v. a western relief road of Crawley providing an alternative route to and from settlements west of Crawley and Gatwick Airport, thereby relieving pressure on the A23 and improving resilience in the local highway network. This must be in addition to the commitments to improve the local network through the Local Highway Development Fund (see above).
- vi. improvements/dualling of the A24 which would provide an alternative route north especially if the M23 were to be congested/closed. This would be particularly effective with a new Crawley western relief road.
- vii. Confirmation of the Government's commitment to improve the A27, including dualling, across West Sussex and in East Sussex.
- viii. traffic management, including traffic calming on residential roads and rural routes, to help ensure that Airport-related traffic uses the strategic road network. This includes roads to the west of the Airport which do not appear to have been fully considered in the work so far.
- ix. development and implementation of a car parking strategy to:-
  - reduce the extent of inappropriate car parking in, for example Crawley, Three Bridges and Horsham;
  - manage car parking for those wishing to access Gatwick Airport; and
  - provide additional car parking at the rail stations that service Gatwick Airport.

### **Rail infrastructure** - The following will be required:

- i. improvements to the rail infrastructure to enhance access to Gatwick Airport from the east and west. This includes improvements to services to Tonbridge and improvements to and electrification of the North Downs Line linking Gatwick Airport/Redhill to Guildford and Reading.

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- ii. improvements to the Arun Valley rail line to provide better access to the Airport from Bognor Regis, Chichester and Portsmouth. Improving this line could provide an alternative route if the Brighton Mainline has problems and provide better network resilience. This would be especially beneficial if it included a short new rail link, the Arundel Chord, to improve facilities and provide new journey opportunities for passenger movement between the Arun Valley and the South Coast east of Littlehampton. Rail passengers travelling to Gatwick Airport (as employees or air passengers) could help improve the consideration of the value for money of the new Chord.
- iii. provision of more cycle parking at rail and bus stations in West Sussex serving Gatwick Airport to help encourage people (employees and passengers) to use sustainable modes of travel.

### **Bus services** - The following will be required:

- i. continuation of the Passenger Transport Levy beyond 40 million passengers per year.
- ii. extensions to Fastway services and infrastructure.

### **Health care facilities** - The following will be required:

- i. an additional major general hospital and primary health facilities to serve Crawley and Horsham areas, to help cater for the additional population.

### **Compensation** - The following will be required:

- i. 25% uplift to the owners of properties purchased through Compulsory Purchase Orders in accordance with GAL's pledge.
- ii. a Council Tax initiative – either in the form of an annual payment as proposed by GAL or as a single capital payment to be made to those affected. Such payments must be tax exempt or net of tax.
- iii. GAL must also make the noise insulation scheme available to businesses that are noise sensitive as well as residential properties.
- iv. compensation for disturbance due to aircraft noise up to the 54Leq contour.
- v. sufficient compensation for businesses to be relocated.

### **Community and social infrastructure** - The following will be required:

- i. provision of replacement open space in Crawley.

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- ii. infrastructure, such as schools and library provision, needed to support communities, over and above that required to meet the needs of background growth.
- iii. an infrastructure contribution per new home, promised by GAL, that is £5,000 per home paid to the local authority. This must be applied on a pro rata basis possibly up to a total of £90 million as the Airports Commission has projected the need for a higher number of new homes. The mechanism for securing this funding must ensure it is paid up front, once the likely housing demand is clarified and land is allocated through the planning system. The distribution of these funds between County and District Councils must be determined to help meet the local and strategic infrastructure needs.
- iv. recreate the public right of way network around northern and eastern edges of Crawley to reinstate the current “circular” route around the town which would be severed by the Airport’s expansion north east of Manor Royal where the A23 runs alongside airport boundary.
- v. replacement facilities for Crawley Rugby Club, other social and community facilities and places of worship.
- vi. enhancements to Cherry Lane Sports pitches, including all-weather provision, where the boundary of the expanded Airport would abut the northern edge of playing fields) with enhanced landscaping to reduce the visual impact of the Airport.
- vii. enhanced drainage for sports pitches to help enhance the capacity of sports pitches for the additional population.
- viii. support for the provision of affordable housing, especially for people employed at the larger Airport but on lower wages.

### **Flood protection** - The following will be required:

- i. a commitment by GAL to funding in full any additional flood alleviation work identified as necessary by the additional modelling work required before the Commission can be satisfied that flood risk can be adequately mitigated.
- ii. fluvial flood mitigation measures including the Ifield element of the Upper Mole Flood Alleviation Scheme.
- iii. surface water flood mitigation measures, to counteract additional hard surfacing at the Airport and elsewhere including on surface access routes. Where possible, these must be based on sustainable drainage systems and reduce reliance on pumping.

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### **Education, employment and training** - The following will be required:

- i. development of programmes to maximise the local benefits of the Airport's expansion through apprenticeships, training and employment.
- ii. secondary school provision to meet needs as necessary including in Crawley, Horsham and Mid Sussex areas.
- iii. increasing GAL's pledge to create 2,500 apprenticeships pro rata to the number of jobs created by the Airport's expansion as the Commission's forecast of additional jobs is higher than GAL's.
- iv. investment with the aim of relocating displaced businesses to other suitable sites in West Sussex. This is different to the compensation paid to businesses that suffer disruption and lost business do to relocation.

### **Utilities** - The following will be required:

- i. additional waste water treatment capacity to provide for the Airport's growth and additional housing growth in the area. The ability to supply water for the Airport's expansion has been confirmed by the Airport's supplier – Sutton and East Surrey Water. The supply company has provided a written statement to that effect. Water supply more widely in West Sussex, for new homes and businesses as well as existing consumers, has not been reviewed by Gatwick Airport Limited or the Airports Commission. That will be a topic for the other water supply companies serving West Sussex through their negotiations with Ofwat and the local authorities regarding their local planning activities. Measures such as bulk transfer of water between regions are already being discussed due to the geographic disparity between demand and resources. This must be flagged up by the Commission in its considerations and, if appropriate, in its recommendations to the Government.
- ii. additional water supply to support the Airport's growth, including local catchment and grey water use.
- iii. additional arrangements and facilities for waste disposal.

### **Environmental mitigation** - The following will be required:

- i. habitat recreation and enhancement to replace those lost to the Airport's expansion. This must be linked to public access and be supported with funded on-going management and maintenance agreements.

## Consultation Response Form



**Finish**

## Consultation Response Form



**This is the end of the consultation response form.**

If you wish to submit your response electronically, please e-mail this document, and any associated files, to: [airports.consultation@systra.com](mailto:airports.consultation@systra.com).

If you wish to post your response, please send to:

Airports Commission Consultation

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GU22 2QR

Respondents who submit their response via e-mail will receive a confirmation message indicating that their response has been received. Respondents who submit their response via post will not receive confirmation that their response has been received.

Thank you for taking the time to participate in this consultation. Your comments will be considered by the Commission.

The findings of the Commission's consultation will be published, along with all technical substantive responses, in a consultation report. Publication of this report will be announced on conventional and social media.