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9 January 2019

Dear Stewart,

**GATWICK AIRPORT DRAFT MASTER PLAN 2018**

GATCOM welcomes the opportunity to comment on GAL's vision for growth set out in the Draft Airport Master Plan 2018. Following the last GATCOM meeting on 18 October when the draft Master Plan consultation was launched, the views of all GATCOM and PAG members were sought. The responses received were presented in a draft collective response to the GATCOM Steering Group on 20 December.

As you will appreciate, there are many differing views across the membership of GATCOM about Gatwick's vision for growth, particularly in respect of growth scenario 2 – the routine use of emergency/standby runway for some departing aircraft; and growth scenario 3 - the safeguarding of land for an addition runway. GATCOM's response therefore neither supports or opposes GAL's vision for growth but instead highlights areas where members have reached a common view or understanding.

The response to the master plan consultation questions agreed by the GATCOM Steering Group is appended to this letter for GAL's consideration. There are other matters on which the Steering Group has made recommendations to GATCOM including suggestions on seeking potential future undertakings from GAL to manage future growth of the airport and a full review of the section 106 agreement. The Steering Group's recommendations will be reported to the next meeting of the Committee on 24 January. I will write to you again following that meeting.

I trust GATCOM's comments can be taken into account.

Yours sincerely,



Paula Street  
Assistant Secretary

**BY EMAIL**

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## **GATCOM RESPONSE TO GATWICK AIRPORT DRAFT MASTER PLAN 2018**

### **Question 1: To what extent, if at all, do you support or oppose the principle of growing Gatwick by making best use of the existing runways in line with Government policy?**

Neither support nor oppose.

As there are differing and a wide range of views about Gatwick's growth plans across GATCOM's membership the Committee is not in a position to support or oppose GAL's vision for growth as set out in the draft Master Plan.

GATCOM recognises however the important role of Gatwick Airport in maintaining a vibrant and growing economy for the Gatwick region and that it is one of the region's major economic generators bringing a wide range of benefits. This is a position that needs to be protected and supported. However, while some members of GATCOM see the potential national and regional economic benefits of Gatwick's vision for growth there are other members who do not given the significant negative impacts arising from the scale of growth.

### **Question 2: Please explain why you hold this view.**

The views of all GATCOM member organisations have been sought which has revealed there are differing views on whether or not to support GAL's vision for growth. On the one hand, member organisations recognised that the expansion of Gatwick was likely to bring important economic benefits and new employment opportunities to the local area and region and that there was a need to boost the region's productivity (currently the Coast to Capital area's productivity is less than other comparable LEP areas). On the other hand however many members were equally concerned to ensure that any level of growth was not at the expense of the local environment. It has been commented that although local businesses and employees based in and around Gatwick benefitted from the airport's success, many were also based in those communities that suffered the negative impacts of the airport's operation.

The need to fully understand the impacts of Gatwick's vision for growth is a common theme expressed by members with impacts on the noise climate, surface access networks, air quality, carbon emissions, land supply and skills and labour markets being the topics of key concern, particularly in respect of growth scenario 2. Whilst some members acknowledged that the implications and impacts will be thoroughly tested through the planning process (DCO process), others felt that other than the first five years covered in the draft Master Plan there was insufficient detail included in the draft document to enable them to assess and comment on the benefits or disadvantages of growth scenario 2 (routine use of the "standby"/emergency runway) and growth scenario 3 (an additional runway).

Beyond the first five years, the draft document is therefore viewed very much as high-level vision statement rather than a "master plan". As GAL's assumptions are not fully-formed and little evidence provided to support the growth scenarios, many of GATCOM's member organisations have only been able to formulate responses on those matters in general terms and have not reached a view on whether to support or oppose the vision for growth. It is important therefore that GAL does not assume that there is general support or acceptance of growth scenarios 2 and 3 at this stage.

An issue that needs clarification is GAL's ambitions in terms growth scenario 3. Whilst GATCOM is pleased that GAL has stated that it has no plans at the current time to pursue an additional runway, some members have commented that there is nothing within the draft Master Plan that would preclude the continued use of the standby/emergency runway if a wide-spaced additional runway is built which could result in a three runway operation. GATCOM therefore requests GAL to give reassurance to local communities that it is not its intention to operate a three runway airport as part of its vision for growth.

**Question 3: Given the draft master plan looks out beyond 2030, to what extent, if at all, do you agree or disagree that land that has been safeguarded since 2006 should continue to be safeguarded for the future construction of an additional main runway?**

Neither support nor oppose.

**Question 4: Please explain why you hold this view.**

Again, GATCOM's member organisations have differing views about the continued need to safeguard land for a possible additional runway. Although GATCOM is not in a position to comment on whether or not land should continue to be safeguarded, there is a need for greater certainty on this important matter. GAL has indicated that it will only pursue the development of an additional runway if supported by Government policy. Whilst the Government has decided that an additional runway is to be provided at Heathrow Airport, GATCOM is pleased to note that the Government has in the recently published Aviation Green Paper "Aviation 2050: The Future of UK Aviation", advised that it would be prudent to continue with the current safeguarding of land at airports. This provides helpful clarification to GAL on this matter.

However an issue of concern to some member organisations is that the proposed safeguarding area could potentially affect the deliverability of a Crawley Western Relief Road (CWRR) which would link the A264 and A23. In order to deliver a CWRR and avoid the area of land that is proposed to be safeguarded, it is likely that other land would need to be acquired. GATCOM therefore asks GAL to discuss with the local authorities potential ways in which this issue can be overcome.

**Question 5: What more, if anything, do you believe should be done to maximise the employment and economic benefits resulting from Gatwick's continued growth?**

GATCOM recognises the strategic importance of Gatwick to the local, regional and national economies and that the key issues to be addressed are transport infrastructure, skills, business space and housing.

Ways to support enhanced productivity within the area, a matter raised in the Coast to Capital LEP's recently published Economic Strategy document "Gatwick 360°", need to be found.

GATCOM believes there is further potential to:

- foster even closer links between research, innovation and local businesses, particularly SMEs and their scale-up potential
- develop an active role in creating local opportunities in the supply chain, involving the closer alignment of skills for rapidly evolving industry through further and higher education
- provide greater opportunities to improve social mobility through the local training and education system and up-skilling through employment. There is a need to develop a greater understanding across business and local communities of the additional employment and economic benefits arising from the growth of Gatwick and to explore how the Gatwick and local economies can continue to develop so that those communities closest to the airport benefit from its success.
- encourage businesses within the airport boundary to recruit from the local workforce, across all sectors, skills and salaries.

The shortage of land supply for housing and business use to attract inward investment is an on-going concern for the business community and local authorities across the region. The availability of suitable business premises to attract new inward investment and to accommodate growing businesses will be a further key factor to address.

As regards the visitor economy, GATCOM has been updated on the Gatwick Growth Board's study results of Gatwick's role in supporting the visitor economy. Given the recent work the draft Master Plan does not address how Gatwick could further support the local visitor economy,

for example through encouraging visitors to stay in and visit local towns and make use of their facilities, services and attractions.

**Question 6: What more, if anything, do you think should be done to minimise the noise impacts of Gatwick's continued growth?**

Addressing the noise and aircraft overflight impacts from Gatwick's current operation is a significant challenge involving all stakeholders working together to address ways in which the disturbance suffered by those living under Gatwick's flight paths can be contained and where possible improved. As GAL is very aware the Government's current overall objective on noise is to limit and where possible reduce the number of people in the UK significantly affected by aircraft noise. The growth scenarios, all of which set out potential increases in the number of aircraft movements, will present greater challenges as even though the airlines are investing in newer quieter aircraft types, it is the frequency of aircraft overflight that is the greatest cause of disturbance and annoyance amongst local communities under Gatwick's flight paths.

Unfortunately the draft Master Plan does not include "N above" contours which has prevented interested parties from giving a proper assessment of the noise impacts associated with the growth scenarios. GATCOM wishes to see included in the final Master Plan the N65 (or N70) contours for the daytime and for night (defined as the period between 23:00 and 07:00) the N60 contour as this is directly related to sleep disturbance.

GATCOM's Technical Adviser has undertaken an assessment of the noise impacts associated with each growth scenario based on information currently available. That assessment has been shared with GAL and all GATCOM members. In light of that assessment, GATCOM urges GAL to include in the final Master Plan more detail about the potential noise impacts and how it proposes to address those impacts.

In terms of what more can be done to minimise the noise impacts arising from the vision for growth GATCOM suggests that GAL's priority should be to address the impacts of night noise. For example:

- In respect of growth scenarios 1 and 2 GATCOM wishes GAL to explore the possibility of:
  - no increase in ATMs on the main runway from 2018 levels during the night period 23.00 – 07.00;
  - agreeing to include dispensations into the 11,200 night quota movement limit (using up carry over if necessary);
  - introducing a ban on any movements of the noisiest class of aircraft (QC4s);
- In respect of growth scenario 2 to explore the possibility of committing to no movements from the standby/emergency runway during the night period 23.00 – 07.00 except when the main runway is non-operational.

There is also the need for GAL to consider what other incentives are available to encourage airlines to bring forward investment in the new generation aircraft. For example exploring the scope to further increase landing charges differentials for noisier aircraft types. In addition to this, GATCOM believes there is scope for GAL to commit to further initiatives and measures through the review of the Section 106 agreement. This is addressed in more detail in response to Question 11 below.

As regards airport ground noise, it is important for GAL to recognise that with the increase in movements comes an increase of taxiing on the runway and an increase in aircraft maintenance and the resulting ground runs. Greater acknowledgment of this needs to be included in the final Master Plan.

It is noted that there is a proposal to create a new holding area at the western end of the Juliet taxiway with a new 'end-around' of the standby/emergency runway to access the main runway. All these activities will increase ground noise, especially at the western end and there is a suggestion that a noise barrier maybe constructed to mitigate some of the noise. For a noise barrier to be effective it must be in either close proximity to the noise source or to the receiver.

If located further from the noise source such a noise barrier needs to be higher and therefore more visually intrusive.

Unfortunately no information or noise predications have been included in the Draft Master Plan to be able to assess any potential noise impact from the expected increase in ground noise. It is suggested that this information is provided in the final Master Plan.

**Question 7: What more, if anything, do you think should be done to minimise the other environmental impacts of Gatwick's continued growth?**

GAL has over many years worked with local authorities to manage the impacts of the airport's growth which have been regarded as ground breaking best practice by the industry. There is no doubt that GAL has a proactive approach to managing the environmental impacts of its operations, and whilst there are differing views amongst GATCOM's member organisations about GAL's environmental performance, the challenging targets that GAL has committed to over the years through the Section 106 process and more recently through GAL's Decade of Change Strategy, GATCOM is confident that that proactive approach will continue into the future.

Addressing carbon emissions and air quality need to remain key areas of focus. GATCOM will wish to continue to receive regular updates on the airport's performance on these issues.

GATCOM also requests that a full review of the Section 106 legal agreement be undertaken when the new Master Plan is finalised. It is crucial that GAL and the local authorities can approach that review process with fresh thinking with a view to setting challenging targets building on the approach set out in GAL's Decade of Change Strategy.

GATCOM does however have particular concerns about the assumptions presented in the draft Master Plan about the air quality impacts. GAL made some significant changes to the air quality inventory and modelling methodology between 2010 and 2015 and it is therefore questioned whether the comparison made in the draft document gives an accurate account of the potential impact as direct comparisons between the data sets cannot be drawn. It is felt that an advisory note should be included in the final Master Plan. In addition to this, the draft document states that GAL does not anticipate any exceedance of local air quality limits as a result of growth scenario 2.

Some members have concerns about GAL's view on the potential air quality impacts and the reliability of the modelling outcomes reported in the Air Quality Assessment as the modelled 2015 concentrations do not reflect measured results at roadside receptor points. It is felt there could be an under-estimation of roadside pollutant concentrations in residential areas around the airport (Horsham, Crawley and Horley in particular have been cited) given the increase in airport related road traffic around the airport. As there is much uncertainty, additional sensitivity tests are needed to evaluate some of the key assumptions used in the dispersion modelling for future air quality impacts. GATCOM would therefore wish to see the final Master Plan providing further clarification on the potential air quality impacts arising from the growth scenarios 1 & 2 in particular including growth from increased road traffic.

As regards managing and reducing carbon emissions, GAL's work in reducing its scope 1 and 2 emissions by around 48,000 tonnes between 2010 and 2017 and gaining a carbon neutral accreditation is commendable. GATCOM fully supports GAL's initiatives and its commitment to low-carbon growth and notes that its 2020 target is more ambitious than the UK Government's national target to reduce UK carbon emissions by 51% below 1990 levels by 2025.

However, GATCOM also notes that as surface access emissions went up by 50,500 tonnes over the same period this will negate the improvements made by the airport. Based on the data presented in the draft Master Plan it appears that at no point into the future the airport's total carbon emissions decline. Given the forecast growth in aircraft movements it is therefore unclear how the Government's Aviation Framework objective of 'to ensure that the aviation sector makes a significant and cost-effective contribution towards reducing global emissions.' can be achieved.

GATCOM feels that there is further work to be done to address this including targeted initiatives as part of the review of GAL's surface access targets and also as a result of improvements that could arise from shorter flight-paths brought about by airspace modernisation and reduced holding on the ground.

**Question 8: Do you believe our approach to community engagement, as described in the draft master plan, should be improved, and if so, how?**

GATCOM receives regular updates on GAL's community engagement programme and initiatives being pursued across a wide range of local activities such as Gatwick Diamond Meet the Buyers and STEM skills and other employment/skills initiatives, local event sponsorships, charity support and direct contact with local authorities and community groups. These programmes will be even more important under the growth scenarios, particularly in respect of GAL's direct engagement with local councils and community groups to help improve trust between Gatwick and the communities who are negatively affected by the noise from the airport's operation.

GATCOM would also like to see reference to GAL's engagement with GATCOM and GATCOM's PAG in particular referenced in paragraph 2.4.2 -The CAA has assigned PAG a role as a consultee in the Capital Investment Plan.

As regards GAL's draft Master Plan consultation plan, GATCOM is aware of the concerns expressed by local community groups and some GATCOM members about the number and locations of GAL exhibition events. There is a need to learn lessons from the feedback received and to regain the confidence of local communities that GAL is seeking to obtain the views of all communities. If GAL decides to pursue growth scenario 2 – the routine use of the standby/emergency runway, which will require extensive consultation as part of the DCO process, GATCOM asks that a draft version of GAL's consultation plan is shared with GATCOM in advance of any public consultation being launched. Such an approach will enable all member organisations to input their valuable knowledge of the local communities they represent to ensure that the consultation plan is inclusive and provides the widest reach in terms of engagement opportunities. This approach will also be important in developing consultation plans for the proposals coming forward as part of the airspace modernisation programme FASI(S).

**Question 9: If you make use of Gatwick, what areas of the passenger experience would you like to see improved?**

In general terms, members have commented on the capacity of the airport to handle the increased passenger throughput arising from the growth scenarios. A key objective of the Government's aviation strategy review is to give greater focus to the needs of passengers. GATCOM's Passenger Advisory Group (PAG) has considered this aspect of the draft Master Plan in great detail. Having considered the views of PAG, GATCOM's comments are as follows:

Growth Scenario 1 – Making best use of the existing main runway:

- Growth in Passenger Numbers – the calculations given on the potential number of passengers that could be handled on a single runway which take into account larger aircraft and an increase in the maximum number of movements per hour are noted.
- Demand For Capacity – the draft Master Plan does not present independent evidence of the demand for this capacity. It is important to understand how much growth is expected to be passengers from UK or from inbound travellers. A factor that should also be considered is how many airlines will move to Heathrow when (if) a third runway becomes operational.
- Facilities for Passengers – the need for additional terminal facilities is hardly mentioned in the draft Master Plan. At 2018 volumes, GATCOM believes both terminals are already in need of additional floor space, particularly circulation space. GATCOM's PAG has advised that it could not support the handling of increased volumes without such an increase. A 'great' passenger experience in the departure lounge is so important in establishing/ maintaining passenger commitment to Gatwick. It has been questioned

whether adequate terminal facilities could better be provided by a third terminal built within the existing airport boundary or by, yet again, expanding both the existing terminals. Facilities for immigration and baggage reclaim will need expansion.

- Resilience – There is concern that resilience is not a prominent feature of the draft Master Plan. With an increased number of passengers, speed of switching to the standby/emergency runway, capacity of the terminals to handle delayed passengers and hotel facilities are so important. In addition with increasing use of larger aircraft, when the main runway is out of action, clarification needs to be given as to how aircraft will be handled as they cannot use the shorter standby/emergency runway.

Growth Scenario 2 - Routine use of the standby/emergency runway and the main runway - All the concerns listed for growth scenario 1 apply to this option. In addition, if GAL decides to pursue growth scenario 2, there is a need for GAL to give assurances that the process of widening the standby/emergency runway and relocating the Juliet taxiway will not result in reduced capacity whilst work is carried out. A number of members have also raised concerns about the safety aspects of using the standby/emergency runway, particularly when the airport is operating aircraft departures in an easterly direction.

**Question 10: Are there any aspects of our Surface Access Strategy that you believe should be improved and, if so, what are they?**

GATCOM has on-going concerns about the significant congestion already arising on the strategic motorway and road network in the area and on local roads and the capacity constraints on the Brighton Main Line to accommodate the growth scenarios. There is support for the transport infrastructure ambitions and priorities set out in Coast to Capital LEP's Strategic Economic Plan – Gatwick 360<sup>1</sup> and these are viewed as essential to realise Gatwick's full potential as an economic driver.

As previously advocated by GATCOM, effective, efficient, high quality and resilient surface transport to Gatwick benefits not just passengers and airport staff but also the local population and is an integral part of the sustainable growth of the airport. GATCOM has on-going concerns about the reliance on a single motorway and a single rail connection to an expanded Gatwick and these are issues that GAL needs to continue to address with the Government, Network Rail, Highways England, transport providers and local highway authorities.

GATCOM has welcomed the recent capacity enhancements schemes in the Brighton Main Line and M23 but there is concern that these enhancements were designed to support background growth rather than Gatwick's new vision for growth. It is also questioned whether the current redevelopment scheme for Gatwick Airport Station will be able to accommodate the projected passenger numbers under growth scenarios 2 and 3.

GATCOM supports GAL's targets to increase the public transport mode share to the airport and reduce the reliance on car journeys, by passengers and staff, as airport capacity continues to grow as well as GAL's specific initiatives to encourage and create more sustainable forms of private transport building on recent activities such as the forthcoming introduction of an electric/hybrid taxi fleet servicing the airport from 2020.

GATCOM continues to believe that more focus needs to be given to improving the east – west links to the airport particularly to bring forward initiatives to serve passengers and staff accessing the airport from areas in Kent by rail and coach. For example, there is a need for GAL to support the reinstatement of the rail service to Tonbridge via Redhill and Edenbridge, with a possible link to the existing service between Gatwick and Reading. This would help widen the economic benefits of the airport to Kent.

The increasing volume of cargo now handled at Gatwick has raised concerns about the implications of increased freight movements in and around Gatwick on the strategic road

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<sup>1</sup> <https://coastalwestsussex.org.uk/coast-capital-launch-strategic-economic-plan-2018-2030/>

network and also about the storage capability on-airport. There is a need to have a greater understanding of Gatwick's cargo activities and the possible implications of the growth in freight on the strategic and local road network.

Building on the response to question 9 above, GATCOM highlights the need for GAL to address the implications of growth in passenger numbers on the capacity of car parking at the airport. There is a need to understand the nature and origin of the potential additional passenger markets so that any increase in car parking provision is targeted and the right parking products offered to ensure that the indiscriminate airport-related car parking currently experienced in neighbouring residential areas does not worsen.

**Question 11: Do you have any other comments to make about the Gatwick Airport draft master plan?**

GATCOM has welcomed the opportunity to comment on GAL's emerging vision for the growth of the airport over the next decade and beyond. The innovative approach to looking at how to make best use of the existing infrastructure to secure the continued growth airport and to enable GAL to better compete in the London airports market is acknowledged. However the scale and rate of growth is a major concern to many local communities in the Gatwick area, particularly those communities that are under Gatwick's flight paths and suffer the negative impact from Gatwick's success. Plans to intensify the use of the current runway (which cannot be controlled through the planning system), added to the substantial growth in passenger numbers over past few years, will put additional strain on the already stretched supporting infrastructure in the area. This must be addressed and firm proposals need to be put forward in the Master Plan as to how GAL is prepared to deliver measures to address the negative impacts of this incremental growth.

Greater clarity is also needed on the timelines for taking forward the mitigation measures which need to be delivered as the airport grows and, most importantly, at the time new capacity becomes operational in respect of growth scenarios 2 and 3.

GATCOM notes that there is an expectation that a full review of the section 106 agreement will be undertaken when the new Master Plan is finalised. It is hoped that in developing a new legal agreement GATCOM is kept fully engaged and is given the opportunity to contribute to the identification of key areas of importance to local communities, including the business community, which need to be considered as part of the process. In taking forward the ambitious vision for growth it is crucial that GAL and the local authorities can inject fresh thinking with the aim of securing effective mitigation measures and enhanced benefits for all interests with a suite of challenging, outcome based and measurable targets building on the approach set out in GAL's Decade of Change. GATCOM wishes to progress this approach further with GAL over the coming months as GAL's thinking emerges.