

Planning Policy,  
Mid Sussex District Council,  
Oaklands,  
Oaklands Road,  
Haywards Heath,  
West Sussex.  
RH16 1SS.

February 14<sup>th</sup> 2017

Dear Sir / Madam,

**Gatwick Airport Limited Further Comments to Mid Sussex District Council '*Submission Draft District Plan*'.**

Introduction

- Gatwick Airport Ltd (GAL) has been notified about the above mentioned Consultation.
- This note sets out GAL's formal comments as an interested party and as the owner and operator of Gatwick Airport.
- GAL's Representatio is made with particular regard to the catchment of Mid Sussex District Council and focusing upon its close proximity to the airport.
- GAL request to be notified of any amendments made to the Submission Draft District Plan following the Examination In Public and of the next stages in the Draft District Plan progressing. GAL would like to highlight that we do wish to attend the 'Examination in Public'.

Background

Gatwick Airport Limited (GAL) welcomes the opportunity to comment upon the Mid Sussex District Council Submission. Gatwick Airport Limited is a proactive stakeholder within the Mid Sussex local community and of the wider sub region.

Gatwick Airport offers an international gateway for Mid Sussex to access in order to help boost its economic growth. Gatwick Airport is the UK's second largest airport and the most efficient single runway airport in the world. It serves more than 200 destinations in 90 countries for more than 40 million passengers a year on short and long-haul point-to-point services. It is a major economic driver for the South-East region therefore creating a significant impact upon the Mid Sussex area.

The Government is currently considering the National Policy on Airports and the National Policy Statement is now open for consultation. If any expansion at Gatwick Airport were to be permitted sometime in the future it would provide an even greater economic boost with a potential development of new runway. It is widely recognised that

the local economic benefits would however be appreciated far in advance of a second runway actually opening with many socio economic benefits potentially being realised almost immediately within the local communities of Sussex which surround the airport.

**Gatwick Airport Limited Further Consultation Comments:**

In response to the Inspectors comments and questions on the Submission Draft Plan (herein referred to as the 'Plan') GAL would like to put forward the following comments in conjunctions with the Representations that GAL have already made at earlier stages in the Plan consultation process;

***Policy DP27 – Noise***

GAL promotes the need for additional text in the proposed Policy DP27 and the specific inclusion of noise metrics thresholds relating to proposals for new noise sensitive development in areas with known exposure to noise from aircraft. This is an approach which has recently been adopted by the Crawley Borough Council Local Plan 'Crawley 2030'. This pragmatic planning making policy approach would help to ensure that new development proposals for residential development and other forms of noise sensitive development are not afforded planning consent where there is the risk of exposure to unacceptable levels of noise. This includes the inappropriate location of new residential development around the airport which is an insitu known noise generating development. There are published noise contours relating to aircraft noise exposure around Gatwick Airport and which are publically available.

GAL considers the clarification provided by such additional modifications to the Plan - i.e. the inclusion of clear noise metric thresholds for development in Policy DP27 - will both avoid development forms which could be adversely impacted upon due to proximity to the airport and specific flight pathways, and avoid any further constraints on the ability of the airport to grow and promote economic gains to the region.

GAL considers that the addition of noise metrics and threshold limits to the Plan will bring greater robustness to Policy DP27 as a tool for assessing the acceptability of noise sensitive development in relation to the known defined noise exposure levels.

In the absence of any specific guidance on set noise threshold metrics in the Plan noise generating developments could result in higher noise exposure limits for noise sensitive development (such as housing) and as a result, lead to significant adverse effects on future residents, contrary to the National Planning Policy Framework and Noise Policy Statement for England.

GAL considers that it is undesirable to permit 'major noise sensitive developments' in areas of slightly lower noise exposure there should be a presumption against such development in areas exposed to noise levels >60dB Leq daytime and 57dB Leq night.

In particular the current and possible future noise impacts of Gatwick Airport, including those resulting from a potential second runway, should also be recognised as a possible constraint on locations within the District for new housing allocations.

In terms of limiting exposure to noise GAL believe that Policy DP27:

- i) Should not permit residential development and noise sensitive proposals which would result in exposure from existing or future predicted aircraft noise levels of greater than the 57dBa Leq;
- ii) In relation to 'major new noise sensitive developments', it is also desirable to avoid such developments in areas exposed to noise levels 60dBA Leq.

GAL wishes to highlight the following good practice guidance regarding noise and planning for development which should be further noted within the Plan and when considering the policy wording proposed for Policy DP27;

*Best Practice: Government Policy and Advice on Noise:*

*National Planning Policy Framework ('NPPF') and the Noise Policy*

*Statement for England ('NPSE')*

National Planning Policy Framework

The NPPF states that planning policies and decisions should

"Aim to avoid noise from giving rise to significant adverse impacts on health and quality of life." (Para 123) (GAL emphasis)

This statement cross refers to the NPSE which includes the same aim and in support of a Vision Statement to: "Promote good health and a good quality of life through the effective management of noise within the context of Government Policy on sustainable development"

Aviation Policy Framework ('APF') (2013)

The Government recognises that, of the environmental impacts of aviation, noise is the primary concern of local communities near airports. The APF includes an overall

objective on noise:

“to limit and where possible reduce the number of people in the UK significantly affected by aircraft noise” (3.12).

It notes that this objective is consistent with the noise policy in the NPSE. Land-use planning and management is one of four principal elements identified in a ‘balanced approach’ to managing noise impacts.

Paras 3.20 to 3.22 provide further information on Land Use

Planning aims including emphasising that:

- (in line with the NPSE and NPPF) planning policies and decisions should aim to avoid a situation where noise gives rise to significant adverse impacts on health and quality of life as a result of new development (para 3.20)

“the NPPF is quite clear that the planning system should prevent new development being put at unacceptable risk from, or being adversely affected by, unacceptable levels of noise pollution” (para 3.22) (our emphasis).

Planning Practice Guidance (‘PPG’) (2014) although revoked in the absence of further valuable technical guidance it still widely considered to offer practical advice to determine:

- Whether or not an ‘adverse effect’ is occurring or likely to occur;

And

- Whether or not a ‘significant adverse effect’ is occurring or likely to occur.

GAL therefore requests that the Plan does identify in Policy DP27 the ‘Acceptable Noise Thresholds’ within which new development would be permitted in order to add to the effectiveness of the Plan as a decision making tool for both planners, the local community and project promoters. There is a published Sussex Noise Advice Note also available which many of the LPA’s use and signpost as planning guidance. The inclusion of noise metrics limits within Policy DP27 will add significant merit to the Plan.

***Policy DP19 Transport***

***Airport Related Car Parking Development***

GAL considers that the Plan remains silent on policies and supporting text directing the important sustainability issue of off airport car parking development. This is a weakness in the current Plan as airport related car parking is a significant issue for planning in Mid Sussex and the surrounding communities. The recently adopted Crawley Borough Council Local Plan has directly tackled this matter and has defined the planning Policy GAT3 for airport related car parking development. Policy GAT 3 aims to give certainty for developers and most importantly to promote the most sustainable options for those users of the airport who choose to travel by private car. GAL requests that the Mid Sussex Plan also takes such a policy approach and that in the interests of sustainability all airport related car parking is permitted 'on airport only' with this demonstrated in the actual policy text the proposed Policy DP19 Transport.

'Promoting Sustainable Travel' is one of the 13 key themes in the NPPF. This theme includes the following policies:

"Encouragement should be given to solutions which support reductions in greenhouse gases emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport." (Para 30)

"Local Authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development, including ... transport investment necessary to support strategies for the growth of ... airports." (Para 31).

Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (Para 34).

In 2012 GAL published its revised Airport Surface Access Strategy (ASAS) – Access Gatwick and a related Car Parking Strategy. Approved by the Airport Transport Forum, the ASAS provides the formally agreed strategy and vision for Gatwick's transport connectivity to 2030, including airport passenger and staff car parking requirements

pursuant to Gatwick's S.106 Agreement with Crawley and West Sussex.

GAL pays an annual levy all of its car parking spaces. The levy is an important means by which actions to promote sustainable travel options as set out in the Airport's Surface Access Strategy and Travel Plan are funded and progressed. There is therefore a direct correlation between the provision of car parking at Gatwick Airport and the financial support provided to sustainable transport initiatives.

Unlike on airport car parks that are provided within the airport boundary at North Terminal and South Terminal and served directly from the strategic road network (M23 Spur and Airport Way) and in close proximity to the passenger terminals, the proposals for off airport car parking developments are more remote from the airport. This means that travel distances to and from the site by the 'meet and greet' drivers are not only greater in number but are also longer in distance.

The development of off airport car parking in Mid Sussex may also involve journeys through areas of countryside on the non-strategic road network. Such off airport car parking would increase both the number and length of car journeys, and so add to congestion on the local road network, and increased local air quality and CO2 emissions, compared with on-airport car parks.

In overall terms it is difficult therefore to conclude otherwise than that parking at the airport is the most sustainable location to park by reducing overall distances travelled and contributing towards sustainable travel choices through the car park levy. In simple terms proposals for development of further off airport car parking developments should be restricted by the Plan as it would promote a less sustainable form of development than on airport parking and therefore be contrary to the policies of the NPPF. GAL strongly considers that in the interests of promoting greater sustainability the Plan should go further in specifically addressing the issue of planning policy for airport related car parking development by the following inclusion within the wording of Policy DP19;

*'all proposals for new airport related car parking development will only be permitted for locations within the airport boundary'.*

If you have any further queries or would like to discuss the comments put forward by GAL in this Further Representation please do not hesitate to contact me.

Yours sincerely

YOUR LONDON AIRPORT  
*Gatwick*

*Rita Burns*

Planning Manager  
Gatwick Airport Ltd.