

# YOUR LONDON AIRPORT

## *Gatwick*

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Dear Alberto,

### **CRAWLEY WESTERN LINK – FINAL PRESENTATION AND REPORTS SEPTEMBER 2022**

I write further to the presentation given by Systra on 21<sup>st</sup> July 2022 and the following information that was circulated on 21<sup>st</sup> September 2022. Apologies for the delay in responding to the reports and supporting information, which is listed below.

- Northern Section Corridor Study Final Presentation, 21 July 2022
- Crawley Western Link Road – Northern Section Study, Refined Area of Search, 23<sup>rd</sup> March 2022
- Concept Design and Costing Report, 8<sup>th</sup> November 2021
- Various Appendices A to G

### **Gatwick Airport Limited's (GAL) safeguarding area**

GAL's safeguarded land is discussed in Section 3.2 of the Refined Area of Search report. The report acknowledges that the safeguarding boundary constrains the space available for the Crawley Western Link Road (CWLR) route. GAL is concerned that, even though the safeguarded land is acknowledged and reference is made later in the report to GAL's previous request in 2021 to remove the safeguarded land from the proposals, that this request has been ignored and the two preferred route options would still encroach into GAL's safeguarded land.

In Para 1.1.1 of the report, it is stated that in relation to the safeguarded area "Where encroachment is unavoidable..." the aim of the study is to reach agreement with major stakeholders. The study clearly concludes that encroachment **is** avoidable (with shortlisted route options) but the approach to defining the area of search goes on to suggest the safeguarding may be disregarded if balanced against other criteria. It should be made clear that this is a judgment for the consultants and Crawley Borough Council as this impacts the shortlisting and analysis of the presented routes. GAL will continue to maintain its position of objecting to any proposals for development within the safeguarded area, in accordance with the safeguarding policy.

### **Option Identification and Sifting Methodology**

GAL considers that splitting the study area into three sections – Western, Middle and Eastern – is a sensible approach to assessing their suitability and enables a more granular consideration of the options. Within each of the three sections, the Refined Area of Search report considers the suitability of the long list of options.

GAL welcomes the removal of Options W5, MS6, ES4 and ES5 which are identified as causing ‘considerable GAL safeguarding encroachment’. It is noted that Options WS1, WS3, WS4, MS2, MS3, MS4 and ES2 (slight encroachment) were retained for the purposes of the options sifting assessment, as were ES3 and ES3a which GAL has previously asked to be sifted out. At the end of the process, the retained options were:

- Western Section: WS1, WS2, WS3 and WS4
- Middle Section: MS1, MS2, MS3 and MS4; and
- Eastern Section: ES1, ES2, ES3, ES3a, ES12 and ES17

During the presentation the ‘multi-criteria analysis’ that informed the option sifting was shared with Gatwick. This includes ten criteria that are in turn weighted. The weightings are even for seven of the criteria (11.5%) with lower weightings for ‘commercial/industrial impact’ (7.7%), ‘network performance’ (7.7%), ‘ease of delivery’ (3.8%).

GAL would question the way in which Systra has arrived at the criteria for the sifting and the way in which they have been weighted. The justification in Paragraph 7.2.1 of the Refined Area of Search report is that “*a weighting factor has been applied to help align the scoring with the factors which are most important to the CWLR scheme*”. GAL considers that the approach to the sifting assessment is flawed as the methodology lacks transparency over how and why certain criteria have a higher or lower weighting; the weighting scores are so evenly balanced that the final scores for each route option are very close together, meaning no real front runner can be identified during the sifting exercise; in addition the assessment omits any consideration of planning policy constraints, including GAL’s safeguarded land.

Paragraph 7.9.3 of the Refined Area of Search report acknowledges the significant encroachment of Route Options ES3 and ES3a but considers that this should be offset by the “*substantial positive aspects in comparison to other Eastern route options*” (Paragraph 7.9.3). The report goes on to say:

*“It is acknowledged that these options are unlikely to be able to coexist with a Gatwick southern runway, but the possible significant interim positives prior to a potential future southern runway expansion may warrant further investigation. In this instance, an alternative option post-southern runway implementation must also be agreed upon as part of a business case analysis in order to make ES3 and ES3a a feasible option.”*

### **Summary**

Overall, whilst we understand the study and its reports to be matters for Crawley Borough Council, we have concerns over the reliance the Local Plan update may place on its outcomes. In particular, please note our comments on the sifting of options, the criteria used and the assessment itself. The wording of several sections (for example 5.3.5) seems to indicate an

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underlying assumption that the safeguarding can be give less weight or ignored, and indeed this is reinforced by the inclusion and assessment of options ES3 and ES3a, which appear to have been treated differently to other options with significant constraints. This indicates a tacit disregard for the safeguarding, which is a theme throughout the report. This is a matter for Crawley Borough Council to reflect in terms of the Local Plan, which in previous drafts accepted the current safeguarding status.

GAL objects to the inclusions of Route Options ES3 and ES3a and does not consider that the implementation of new road infrastructure constitutes an 'interim' solution as its diversion post-implementation would present a number of significant challenges. GAL therefore requests again that Route Options ES3 and ES3a are removed from the sifting options. GAL does not support the Refined CWLR area of search proposals due to their significant encroachment into safeguarded land.

Yours sincerely,

*Lydia Grainger*

**Planning Manager  
Gatwick Airport Ltd**

Enclosures:

Appendix 1: GAL's Detailed Comments on Refined Area of Search Report

Appendix 2: GAL's Detailed Comments on Concept Design and Costing Report

Appendix 3: GAL's Detailed Comments on Traffic Modelling Note

**Appendix 1: GAL's Detailed Comments on Refined Area of Search Report**

GAL has the following detailed specific comments relating to the Refined Area of Search report, as set out below.

- Please ensure references to the airport safeguarding correctly reflect this is a national safeguarding policy relating to Gatwick Airport, it is not "Gatwick's" safeguarding.
- Para 2.2.5 – clarification should be made in respect of the cross section for the CWLR middle section meeting both DMRB CD 127 and LTN 1/20 and the extent this is true for each of the different cross sections for the northern section (as shown in Figures 7 to 11).
- Section 3.2 – refer to comment above, please refer to the national safeguarding relating to Gatwick Airport, it is not "Gatwick Airport Limited's safeguarded area"
- Para 3.2.3 – the representation of the safeguarding changes are not accurate. The safeguarding area is consistent with one of three options from the 2019 Gatwick Masterplan referred to. The safeguarding area and masterplan presented at that time is the one developed for the Airports Commission and shared via a public consultation in April and May 2014, prior to the adopted Crawley Local Plan Policy GAT2. The masterplan option relating to the safeguarding was not revised between 2014 and 2019.
- Para 5.3.4 – the report should be explicit around the assumptions made for what is "believed" to be acceptable encroachment into the safeguarding land, and whose determination that is. It has not been verified in relation to any further analysis or masterplan design in relation to the operation of Gatwick Airport under a two-runway segregated operation, or taking account of any other operational, safety, masterplanning or environmental considerations. Appropriate reference should be made for statements relating to "standard runway cross section" (note, this should be checked for other paragraphs as well, e.g. 5.3.16 and 5.3.21).
- Para 5.3.5 – this is misleading, since all alignment options could be introduced before any airport expansion. What makes Option ES3 and ES3a different is that they would be introduced in the knowledge that they could not under any circumstances remain were Gatwick Airport to expand in accordance with the safeguarded area. As such, they represent a considerable risk and prospect of significant extra cost to Crawley Borough Council and West Sussex County Council to provide for the subsequent diversion or re-provision of the route. Note also that the location for the tie in at the A23 at Hydehurst Lane does not match the new roundabout location proposed in the GAL masterplan, which is clear from the illustration shown and therefore this statement should be removed or revised.
- Para 5.3.6 – this suggests there is access within the Gatwick Masterplan for general traffic along the southern edge of the safeguarded area that could accommodate the traffic from the CWLR Northern Section. This is not the case, the extent of public highway lies only to the east of the A23 and does not provide an access route west of the A23. This statement needs to be removed and the approach taken for general traffic in option ES3a reconsidered.

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- Para 6.3.4 – please correct the statement regarding encroachment into the safeguarded area. All options that encroach into the safeguarded area present an issue and should be considered a risk for adopting a preferred alignment that may impact on a future operational masterplan. Noting that further design work would be required for both the highway and airport infrastructure it is fair to note that for some options the degree of overlap within the safeguarding area is not sufficient to sift them out at this stage. You may consider that for the purposes of this study, this applies to all identified options with the exception of ES3 and ES3a.
- Section 7.2 – this section should make clear that neither the assessment criteria nor the weightings applied were discussed or agreed with stakeholders. We would note that a low weighting for ease of delivery, when there are considerable constraints and risks associated with the proposals yet a high weighting for cost, when only a very high-level costing exercise has been undertaken, seems illogical. Since there is little to distinguish between options in terms of a shift to active travel/public transport (noting variations of cross section) it is also surprising that this is given such a high weighting.
- Para 7.2.3 – although the issue of safeguarding, which is used as a sifting criteria (but was then discounted in respect of options ES3 and ES3a) is not repeated in the MCA scoring we note that public transport and active travel is included as both a criteria and a high weighting, which shows an inconsistent approach has been applied. We also note that the views of Gatwick Airport Limited in respect of certain shortlisted options have not been taken into account in any of the scoring.
- Section 7.4 and reference Appendix D – the differences between option WS1 and WS2 appear overstated in the scoring, in particular relating to residential impact, ease of delivery, stakeholder acceptability and cost. We would expect these to have much more similar scores given the level of assessment undertaken.
- Section 7.6 and reference Appendix D – there appears to be double-counting of the residential impacts of options MS3 and MS4, which is also cited under environmental constraints, leading to lower scores than options MS1 and MS2 in both criteria.
- Section 7.8 – the summary of the performance illustrates some inconsistencies and weaknesses in the assessment, in particular by not acknowledging the additional costs and risks associated with options ES3 and ES3a. Impact on commercial value is cited against the costs for option ES1 and ES2 yet land and property costs are excluded from the cost calculation and this indicates double-counting with the ease of delivery criteria, which also cites impact on commercial premises. The stakeholder acceptability criteria completely ignores Gatwick Airport Limited's views in respect of ES3 and ES3a. There is also reference to options ES1 and ES2 being assessed against other options under stakeholder and public acceptability rather than against the criteria itself. The cost and ease of delivery scores for options ES3 and ES3a should acknowledge the need for longer term costs and planning/delivery risk associated with their impact on the safeguarded area and these options should be scored lower accordingly. Failing to take future changes into account indicates the safeguarding issues have been ignored in the scoring for these options.

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- Para 7.9.1 – the first statement is incorrect. The sifting was discussed with stakeholders, the assessment (criteria and scoring) was not.
- Para 7.9.3 – please correct the statement that ES3 and ES3a “...are unlikely to be able to coexist with a Gatwick southern runway...” to “...will not be able to coexist...”. In this same paragraph the note regarding what would be included in the business case analysis of option ES3 and ES3a should be acknowledged and reflected in the scoring of these options. Currently it is not reflected in any way.
- Para 8.1.2 – we do not agree with the statement that the area of search “...will be acceptable to all of the major stakeholders...” even with the exception of the additional area identified for options ES3 and ES3a. Crawley Borough Council and its advisors may consider that the area of search is reasonable for the purposes of the Local Plan, given the need for further work both in relation to the Gatwick Airport Masterplan and any preferred highway alignment and design but including an overlap retains the risk that any alignment coming forward may not be acceptable and that GAL continues its position to object to any indication of Local Plan development within the safeguarding area. It is noted in particular that the study has not and cannot rule out options that wholly avoid encroachment into the safeguarded area.
- Para 8.3.1 – we would query the use of the word “robust”, given the high-level nature of some of the assessment, and a number of inconsistencies in the way the assessment criteria have been developed and applied.

**Appendix 2: GAL's Detailed Comments on Concept Design and Costing Report**

GAL has the following detailed comments on the Concept Design and Costing Report, as set out below.

- Para 2.1.1 and 2.1.2 – the design standards do not make reference to LTN 1/20, as noted in the Refined Area of Search report and whether this would apply to both the 40m and 313.1m cross section.
- Para 3.1.3 – note that this paragraph acknowledges “delivery risks” associated with encroachment into the safeguarding area but these risks are not reflected in the assessment scoring.
- Para 3.3.1 – it may have been more instructive to provide a comparison with a route entirely outside the safeguarding area, given the relevance of the safeguarding to the study.
- Para 4.1.3 – it would be useful to set out what elements are included in the works and construction estimate, given the other costs are only additional percentages of this cost components. For example, does the construction cost only differ due to the linear extent of full or restricted cross-section?
- Para 5.2.1 – given that the Homes England proposals have been consulted upon it would seem logical to describe the impacts of adopting their proposed junction layout on the route options for the Western Section under consideration. As well as design and financial assessment, both planning and legal considerations should be considered for next steps to adequately reflect the constraints and risks of different options.

**Appendix 3: GAL's Detailed Comments on Traffic Modelling Note**

GAL has the following detailed comments on the Traffic Modelling Note (Appendix C and D).

- Para 1.1.1 – this section needs to introduce the context for the traffic flow information provided by Stantec and what status it has in regard to the Local Plan, including any assumptions regarding West of Ifield and other major developments in the area.
- Para 1.1.3 – the “additional housing and commercial space” should be described and the reference to Hydehurst Lane flow estimates explained further.
- Para 1.2.2 – there is insufficient explanation for the origin or context for the quoted 12% mode shift (from what, to what), how this relates to the modelling and if it is a risk to the design how this is accounted for in the assessment.
- Appendix D – whilst it is assumed that the LINSIG diagrams are showing AM and PM results there are no labels to confirm this is the case.