



Gatwick Airport Northern Runway Project

Consultation Report Annex D - Summer 2022 Consultation Consultee Response Summaries

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1 Summary of responses from Prescribed Consultees, Local Authorities, and Town and Parish Councils

1.1 Betchworth Parish Council

- 1.1.1 Betchworth Parish Council believes the proposals will add to traffic congestion in the area causing disruption to residents. In addition, they will increase air pollution adding to global warming. The Parish Council does not believe the proposals address the additional traffic that will be using the M25 (which is already at capacity) given that rail links to Gatwick are already poor.
- 1.1.2 The Parish Council states that by reducing the number of additional car parking spaces by about 6,000 this will lead to an increased use of off-airport car parks and even more use of local roads.
- 1.1.3 The Parish Council considers that the increase of capacity at Gatwick which is already one of the busiest airspaces in the UK will bring an extra one million tonnes of carbon every year on top of pre-Covid amounts. The issues of noise increases, increased pollution and commitments to the reduction of CO2 need to be addressed.

1.2 Buckland Parish Council

- 1.2.1 Buckland Parish Council references the response made by Gatwick Areas Conservation Campaign (GACC) on air quality and ecology regarding the highway plans, and the intention to remove mature trees from Longbridge roundabout and the London Road. The Parish Council believes that replacement planting will not be ecological enhancement, but a loss of biodiversity, carbon sequestration, natural screening and amenity.
- 1.2.2 The Parish Council considers that engagement on the noise envelope is inadequate given the importance of noise management. In addition, it believes that the noise envelope is not compatible with good practice at other airports and does not comply with CAA guidance.
- 1.2.3 The Parish Council believes the noise envelopes group's terms of reference are one sided to favour the Applicant, that the group lacks independence and the timetable for the process is unrealistic. It states that the Applicant is withholding information that only it can provide and hence without it, it is not possible to formulate or agree to the noise development proposals.
- 1.2.4 The Parish Council states it has already submitted its views on the night flights, as they currently cause disturbance to some residents, and they seek more information before making further constructive comments.
- 1.2.5 The Parish Council recognises the need to encourage the economic advantages of the airport in terms of local employment and businesses balanced with protecting the area from the adverse effects of aviation.
- 1.2.6 Concerns are raised about the impact on local roads of the proposals.

1.3 Crawley Borough Council

- 1.3.1 Crawley Borough Council welcomes the opportunity to respond but considers that due to the timeframe for the consultation and the fact the Topic Working Groups (TWG) were running in

parallel that they had limited time to review and provide feedback to the consultation.

- 1.3.2 The Council is concerned about the lack of certainty on key details and documents that underpin the working assumptions of the Project and requests further information on commitments listed e.g. the Carbon Action Plan and others.
- 1.3.3 The Council queries the assumptions used for forecasting the increase in passenger numbers, as baseline figures could call into question the need for the northern runway at all.
- 1.3.4 The Council was appreciative of the extension of the consultation from an initial four weeks to an extended six but considered a period of at least eight weeks would have been more appropriate given the scale of the Project. It is also of the view that a further round of statutory consultation is required once more detail is known.
- 1.3.5 The Council believes there was inconsistency between some materials shared during TWGs and those presented during consultation.
- 1.3.6 The Council notes that the impact of FASI-South was not acknowledged or taken into account. It believes the increase in capacity at Gatwick would mean that routes which had not previously seen frequency would experience significantly more air traffic than at present.
- 1.3.7 The Council believes that the wider impacts of the Project have not been taken into account, instead focusing on the physical infrastructure needed to serve highway access to the airport. It considers that provision should be made for improvements to the surrounding local road networks. The Council supports the decision to discount Option 7, the A23 re-routing, given the impact it would have on land and Crawley residents.
- 1.3.8 The Council notes that as part of the M23 spur proposals, there would be an impact on walkers and cyclists in the area as the Sussex Border Path and cycleways would need to be temporarily diverted. It requests details about the duration of these diversions.
- 1.3.9 The Council recognises that there would be a need to close the railway for a short period of time as part of the bridge widening works on Airport Way and requests more detail on these closures. It welcomes the improvements at Gatwick Station but notes that these do not increase space on trains, Further information is requested about how rail services will meet the needs of the Project.
- 1.3.10 The Council requests additional information on the proposals for water management at the South Terminal roundabout particularly the surface water ponds.
- 1.3.11 The Council welcomes the retention from the Autumn 2021 Consultation proposals of the direct route from the North Terminal south towards Crawley, but notes the additional impacts of the new layout, including re-engineering drainage ponds and installing noise barriers. Queries are raised about whether they will be used, and further detail requested about their height. The Council requests that the applicant explore all options to achieve a balance between traffic forecasts, design impacts and mitigations (aesthetically and in terms of noise and biodiversity).
- 1.3.12 The Council requests further detail on the air quality emissions assessment of the highway improvement proposals.
- 1.3.13 The Council agrees that on-airport parking is the most sustainable strategy but notes a need for a detailed parking strategy in line with the Project passenger growth forecasts and requests clarity

on the number and location of spaces proposed.

- 1.3.14 Unauthorised off-airport parking is a concern to the Council, which notes their future management and the challenges associated with raising enforcement action. It notes that existing permitted development rights offer significant scope for new on-airport parking without the need for planning permission.
- 1.3.15 The Council recognises that parking demand is likely to increase and requests that the Applicant provide parking based on passenger growth numbers. It does not consider it necessary for a further 3,000 spaces to be provided to offset the impacts of any enforcement action.
- 1.3.16 The Council requests funding support under the DCO section 106 agreement for a Planning Investigations/Enforcement Officer to be employed by the joint local authorities, including funding for legal resources in the event of a Public Inquiry.
- 1.3.17 A request is made for a mechanism to ensure that a 'sufficient but no more' parking approach is put in place during the construction period of the project.
- 1.3.18 The Council welcomes the removal of the multi-storey car park at Pentagon Field but raises concerns about how this area will be used. It also supports the removal of the decking for car park X.
- 1.3.19 The Council does not consider proposals for the 2,500 robotic spaces should be included in the baseline as no formal consultation has taken place on these proposals through the General Permitted Development Order Process.
- 1.3.20 The Council considers it is not possible to provide feedback on this as no details were provided with regards air quality or the height of the chimneys. However, it notes that the CARE facility will be subject to controls under the Environmental Permitting Regulations (England and Wales 2016) that will regulate emissions.
- 1.3.21 The Council welcomes development of the Airport Surface Access Strategy (ASAS) but is disappointed it is not available to be reviewed. It supports the Applicant's recognition of the need to invest in high quality walking and cycling routes, but notes that it needs to be to the benefit of nearby communities, not just staff and passengers. The Council states there is a real potential to make improvements to the existing provision of active travel infrastructure.
- 1.3.22 The Council recognises that bus and coach travel have a role to play in the sustainable transport mix but says the current provision does not cover the full operating hours of the airport. It believes provision for early morning and late-night flights is needed.
- 1.3.23 The Council notes that it may not be possible for some people with mobility impairments to dismount and push their bikes while the cycle way route NCN21 is impacted for a period of time during construction.
- 1.3.24 The Council asks why hotel bed numbers have increased since the Autumn 2021 Consultation. It also asks if hotels are considered to be 'operational use' and says if they are not, they should be subject to a separate planning application rather than included within the DCO.
- 1.3.25 The Council asks the Applicant to reconsider the BLOC hotel expansion. It recognises that this hotel is a separate commercial entity but suggests its expansion would be seen positively as it is

in a sustainable location and would be an efficient use of land.

- 1.3.26 The Council considers the reduction of new office space as a result of the pandemic to be reasonable but requests that it includes a requirement restricting use to airport-related activity only. It also requests further clarification on the locations of the hotels and offices to be able to determine any visual impacts.
- 1.3.27 The Council notes the changes made to the water management proposals but believes there is insufficient detail to be able to accept the assumptions and requests more information.
- 1.3.28 The Council believes there is insufficient detail to be able to understand the visual impacts of the new treatment works proposed to clear de-icer and contaminated run-off development. It seeks reassurance that this will not impact on the potential expansion of the Crawley Waste Water Treatment works.
- 1.3.29 The Council says it requires the Zones of Theoretical Visibility in order to be able to assess the potential impacts of the visibility of the Project. It also seeks further information on the plans for Pentagon Field to understand the potential ecological and landscape impacts. Further details are also requested to assess the impacts on ecology of the parking proposals, the CARE facility, offices and hotels, acoustic bunds, and the treatment plant.
- 1.3.30 The Council believes that the Project is inconsistent with a net zero future. It states that low-emission alternative forms of transport should be developed to mitigate demand now, and requests assurances that technological changes for aviation can be accommodated in the Gatwick airfield.
- 1.3.31 The Council suggests it is misleading to compare 2047 demand projections with the DfT Jet Zero updated national forecasts for 2050 and states that comparing at 2032 or 2038 shows Gatwick's projected growth is almost double the rate of growth projected nationally. It says this implies a substantial increase in market share which would be at the expense of other airports and would need to be accounted for by displacement allowances in the economic assessment. It notes that by 2047, the gap has narrowed substantially. The Council suggests that all of Gatwick's assumed growth is front loaded to the period to 2032 and beyond 2032, it is slower than DfT's assumed national growth rates which has the effect of bringing forward the benefits and skewing the economic appraisal that has been presented.
- 1.3.32 The Council believes there is a significant risk that the Applicant will not be able to meet the required carbon reductions and therefore the expansion should be phased and linked to thresholds. It asks that stakeholders are consulted on Gatwick's 'Carbon Action Plan' as soon as possible and prior to the submission of the DCO.

1.4 Chichester District Council

- 1.4.1 Chichester District Council is pleased with the focus on moving away from private cars to sustainable modes of transport and with the planned Staff Travel Plan and Construction Travel Plan.
- 1.4.2 The Council notes that the Applicant is preparing a Carbon Action Plan to reduce carbon impacts within its control. It also notes Gatwick's aim to reach net zero emissions (within its control) before 2040 but suggests a preference for this to be done by 2035.

- 1.4.3 The Council notes that the Applicant is working to set limits from future operations at Gatwick and says it looks forward to seeing the measures that will be taken to enforce noise control.
- 1.4.4 The Council asks that the Applicant look into the creation of well-paid permanent jobs.
- 1.5 **Colgate Parish Council**
- 1.5.1 Colgate Parish Council believes that the impact of the Project on local roads has not been assessed. It considers that more highway modelling is required and that the Applicant's proposals are at odds with Surrey County Council's recently approved Local Transport Plan 4.
- 1.5.2 The Council states that the Applicant should invest to ensure that road traffic to the airport uses the main highway network. It suggests introducing measures to reduce traffic on local roads and investing in east/west airport access via bus or train. The importance of providing disabled or step free access from across the network is highlighted.
- 1.5.3 The Council questions the Project emissions reduction figures and the proposal to conform to the Government's 'high ambition' aviation reduction scenario. It states that the DCO submission assessment should set out more realistic scenarios where reduction is much lower.
- 1.5.4 The Council believes that information about the economic costs of the Project is misleading. It states that the non-CO2 effects of air travel and the impact of arriving flights should be included, and that Government guidance requires these to be monetised in Project appraisals. The Council considers that further consultation (for longer than six weeks) should be carried out using the correct carbon values.
- 1.5.5 The Council believes that, given the importance of noise management, engagement on the noise envelope has been inadequate, is not compatible with good practice, and does not comply with CAA guidance.
- 1.5.6 The Council considers the noise envelope group's terms of reference one-sided, that the group lacks independence and the timetable for the process, unrealistic. It states that the Applicant is withholding information that only it can provide and that without it, it is not possible to formulate or agree to noise development proposals.
- 1.5.7 The Council believes that the Applicant is not doing enough to alleviate the impact of road noise on local residents, including the increased use of local roads.
- 1.6 **Cowden Parish Council**
- 1.6.1 Cowden Parish Council welcomes proposals for improved highways given that the network is currently at capacity. It states that the proposed road improvements may help with the Project, but there is still likely to be a significant impact on the wider network.
- 1.6.2 The Parish Council notes that with less on-airport parking there should be more investment in public transport to ensure it can support the Project and help to avoid having external third parties developing off-airport sites.
- 1.6.3 The Parish Council states that the main concern expressed by parish residents is the impact of noise and the resulting future noise increases if the Project goes ahead. It notes that residents in Cowden have regularly experienced aircraft flying directly overhead at heights of 2000-2500 feet.

1.6.4 The Parish Council believes Gatwick is 'nowhere near' capacity at present and that the UK Government has decided an additional runway should be based at Heathrow, stating that there is therefore little justification for a second runway.

1.7 Cranleigh Parish Council

1.7.1 Cranleigh Parish Council questions the assertion that there will be less impact from aircraft noise after the proposals have been built, given there is a predicted increase in the number of passengers and an increase in the number of flights. It believes that even with the next generation of planes being quieter, the number of flights are increasing which will mean the noise will be more constant and more intrusive.

1.7.2 The Parish Council suggests that contradictory information is included in the reports on employment benefits.

1.7.3 It notes that the Parish has declared a climate emergency and whilst aircraft rely on fossil fuels, it believes that the Project would lead to further environmental damage which it does not support.

1.8 Dormansland Parish Council

1.8.1 Dormansland Parish Council states that any growth of Gatwick with resulting increases in air traffic movements would have an impact on the village in terms of noise and increased traffic on the feeder roads to the airport. It objects in principle to the proposals due to the reliance on fossil fuels and long-term climate change impact, although it does accept the role that the airport plays locally for employment and prosperity.

1.8.2 The Parish Council states that the highway proposals do not offer any improvements for the village and will impact an already busy road network, affecting those who live in the area and use the roads to commute.

1.8.3 The Parish Council notes that the railway network is at capacity and unable to accommodate more trains and that the Brighton Main Line is already a busy commuter route and therefore unattractive to would-be rail users.

1.8.4 The Parish Council believes encouraging passengers and staff to use active travel will be a challenge due to some very early or late flights or the unsocial working hours of some airport employees. It believes that the reduction in proposed on site car parking is unrealistic given passenger preferences.

1.8.5 The Parish Council recognises that the Applicant will have little control over unauthorised parking sites, but notes that the use of off-site parking locations has risen in popularity, particularly with the introduction of valet parking which uses fields around the area.

1.9 East Sussex County Council

1.9.1 East Sussex County Council would like to see the traffic modelling extended to include areas which need consideration including Ashdown Forest (a Special Protection Area of Conservation). It notes that Wealden District Council is developing a transport model as part of its Local Development Plan and has engaged with both Wealden and the Applicant to make them aware of this piece of work.

- 1.9.2 The Council believes the price of car parking needs to be set at a rate to make people shift towards more sustainable transport methods. It is pleased to note the reduced minimum number of parking spaces proposed, recognising it is also important to provide sufficient spaces for those who need to travel where there are no sustainable alternatives. The Council is supportive of the Crawley Borough Council request for funding support towards the monitoring and enforcement of unauthorised parking.
- 1.9.3 The Council welcomes the proposal for a noise envelope and suggests this should be introduced regardless of whether the Project goes ahead.
- 1.9.4 The Council supports the proposed approach to low carbon growth, however, it questions whether the forecasts and values used in the PEIR have been appropriately assessed. The Council requests that the Carbon Action Plan include details about how the Applicant intends to reduce - or influence the reduction of - emissions from construction, surface access and aviation and that it be kept informed and involved.
- 1.9.5 The Council is keen that the commitments made in the Employment, Skills and Business Strategy will be included in the new Section 106 agreement reflecting priorities including those identified by local authorities.
- 1.10 Ebernoe Parish Council**
- 1.10.1 Ebernoe Parish Council considers that as a result of the proposals, a large amount of overflow traffic will use the local road network to avoid congestion on the major routes.
- 1.10.2 The Parish Council believes that the car parking proposals go against the Government's policy of cutting car usage and that on site car parks are a revenue stream for the Applicant. It notes that recent rail improvements were financed by the taxpayer and were not put in place to accommodate the Project. It also considers that the £5 drop off fee is pushing traffic to feeder rail stations.
- 1.10.3 The Parish Council asks for information about the carbon footprint of the construction of the Project as well as operation. It notes the rising cost of fuel (fossil and greener alternatives) and believes that the Applicant is ignoring the Environment Act including in relation to small particles released from plane tyres and roads.
- 1.10.4 The Parish Council believes the noise envelope proposals are misleading, suggesting they can be changed to accommodate the modernisation of airspace as part of FASI-South proposals, where new flight paths are proposed. It notes that no cap of flight numbers is offered for day or night flying and it is a 'hope' that planes will get quieter. It states that the parish is affected by aircraft noise at night which is down to the turning of aircraft.
- 1.10.5 The Parish Council believes the Applicant will struggle to fill employment vacancies from the local population and is having to seek workers from further afield. It notes that these workers can not cycle or walk to work and would struggle to buy or rent homes near enough to do so.
- 1.11 Edenbridge Town Council**
- 1.11.1 Edenbridge Town Council believes the road improvements are very localised to Gatwick and would not help Edenbridge as airport passengers would still use the local roads around the town.

- 1.11.2 It supports the aim to increase the number of people using sustainable transport, but believes little information is shared about how the Applicant proposes to do this. The Council also notes that the extra car parking spaces indicate that the Applicant is still providing for non-sustainable transport.
- 1.12 Fittleworth Parish Council**
- 1.12.1 Fittleworth Parish Council is concerned about the impact of the proposals on air quality and the environment particularly within the South Downs National Park, as well as the effects of increased aircraft noise and knock-on effects of increased traffic on the roads. It also raises concerns about the impact of the Project on water resources.
- 1.12.2 The Parish Council is concerned about the Project contributing to an increase in house prices and how this would affect local families.
- 1.12.3 The Parish Council considers the engagement on the noise envelope inadequate and suggests it would be improved by being more independent, having better resources, and operating to a more realistic timetable.
- 1.13 Historic England**
- 1.13.1 Historic England states there is the potential for harm (amounting to less than substantial harm) to a number of undesignated archaeological heritage assets in areas to the east of the airport, including to a number of graded listed buildings. It states that as a result of changes to the noise profile, there is a potential for far reaching impacts to the setting of heritage assets.
- 1.13.2 Historic England considers that one monument – Thunderfield Castle – to the east of the airport may be directly impacted by the proposals and it would welcome the opportunity to discuss this.
- 1.13.3 Historic England notes that under the current plans it appears that no listed buildings will be lost due to demolition, but there may be impacts to Charlwood Park Farmhouse and other graded buildings and any harm to these would need clear and convincing justification. If there is harm, Historic England wishes to be involved in developing a mitigation strategy.
- 1.13.4 Historic England believes that the flyover at South Terminal Roundabout may result in more visual and aural intrusion to nearby heritage assets than the previous proposals.
- 1.14 Health and Safety Executive**
- 1.14.1 The Health and Safety Executive does not advise against the current proposals. It also does not advise against the CARE facility being in the Option 1 location, even though some of the development is within Health and Safety Executive consultation distances. It notes that the location of Option 2 is not within its consultation distances.
- 1.14.2 The Health and Safety Executive notes that Hazardous Substances Consent under the Planning (Hazardous Substances) Act 1990 may be required if the presence of hazardous substances is on, over or above set threshold quantities.

1.15 Horsham Denne Neighbourhood Council

- 1.15.1 Horsham Denne Neighbourhood Council has concerns about the possibility of the new development West of Ifield and the Project causing 'rat runs' in the area. It supports an approach that would see all functions and activities (including car parks and hotels) relating to the airport on site as far as possible, with all non-airport related functions removed from site, and no new non-airport activities introduced on the air side.
- 1.15.2 It requests further information on the heights of the proposed car parks and details about the proposed decking.
- 1.15.3 The Council requests that more information is provided regarding longer distance travel as the plans centre on the Crawley and Horley areas.
- 1.15.4 The Council asks whether there are any plans to improve east to west rail services.
- 1.15.5 It recognises that the forecourt drop-off charge earns money for the Applicant but raises concerns that this charge may increase in time and become a deterrent to its use.

1.16 Horsham District Council

- 1.16.1 Horsham District Council recognises that the highways proposals are designed to mitigate the traffic impacts immediately around the airport but is concerned about the wider implications for surrounding communities and whether these impacts have been taken into account, especially considering other planned growth in the area.
- 1.16.2 The Council has produced a transport model that takes emerging Local Plans into account and has made this data available (for a fee) to developers. It suggests that the Applicant could use this data to support its own transport modelling work. It believes that potential future sites emerging as part of the Horsham District Local Plan should be included to ensure a robust transport model.
- 1.16.3 The Council welcomes the Applicant's updated proposals on parking spaces. It believes that locations within the airport boundary remain the most sustainable places for airport parking but reiterates that any new airport parking must be shown to be needed. It believes a detailed parking strategy is needed which considers and justifies the car parking requirements of the Project.
- 1.16.4 The Council considers proposals for an additional 3,300 spaces to replace lost off-site spaces as a result of Local Authority enforcement, as unnecessary. A 2019 Annual Parking Survey identified that even if (theoretically) all unauthorised spaces were to be enforced against, there would be sufficient authorised capacity on-airport to offset these losses.
- 1.16.5 The Council believes that as part of the DCO, an appropriate mechanism should be attached to the application to ensure that new parking is provided only as it is required, including during construction.
- 1.16.6 The Council is keen to explore whether there is scope through the DCO S106 agreement to seek an annual funding contribution from the Applicant towards a dedicated Planning Investigations/ Enforcement Officer to be employed by the Local Authorities.
- 1.16.7 It recognises there is a need for the Applicant to provide a balance of parking, to encourage

passengers to utilise the sustainable travel modes whilst also ensuring that parking on-site is attractive cost-wise to deter parkers from using the off-airport car parks.

- 1.16.8 The Council does not consider proposals for the 2,500 robotic spaces should be included in the baseline as the necessary screening has not been undertaken to determine whether these qualify as a Permitted Development.
- 1.16.9 The Council would welcome engagement with the Applicant on its proposals as a result of its analysis of potential bus and coach service improvements.
- 1.16.10 The Council is keen to better understand details of the carbon assessments for the Project, particularly in the context of the Government's Jet Zero aspirations, and to review the Carbon Action Plan.
- 1.16.11 The Council notes that the majority of the information is focused on the noise impacts of the highways developments and does not show any adverse impacts on communities within Horsham District.
- 1.16.12 The Council seeks further information to understand the rationale for turning Destinations Place into a hotel and creating a new office building to replace it.
- 1.16.13 The Council welcomes the commitment to more detailed analysis around the impact of the Project in relation to construction employment and the housing of construction workers. It requests consideration also be given to the affordability of housing for new workers as well as the types and tenures of housing needed.
- 1.16.14 The Council considers that the impact of FASI-South should be acknowledged and taken into account. It believes the increase in capacity at Gatwick would mean that use of WIZAD SID would increase resulting in more flights over Horsham District.
- 1.16.15 The Council welcomes the Applicant's reference to the Government's Jet Zero ambitions, but questions projected growth of almost double the DfT's predicted rate of aviation growth nationally. It suggests this implies a substantial increase in market share which would be at the expense of other airports and notes that by 2047, the gap has narrowed substantially. The Council states that while GAL's assumed growth is front loaded to the period to 2032, growth beyond this is slower than DfT's assumed national growth rates. It suggests this has the effect of bringing forward the benefits and skewing the economic appraisal. The Council considers that this needs to be addressed to ensure an accurate assessment.
- 1.16.16 The Council considers it had limited time to respond to the Applicant's approach to Summer 2022 Consultation, however a number of recommendations were made, including a request for in-person consultation events.
- 1.16.17 The Council welcomes the use of videos showing the road improvements and dual runway operations, noting that visuals aids like this help members of the public to understand the proposals. It suggested narrated videos would have further enhanced the videos.
- 1.16.18 The Council was pleased the consultation was extended to six weeks.

1.17 [Horley Town Council](#)

- 1.17.1 Horley Town Council welcomes the proposed new traffic light-controlled junction along the A23

but notes that this junction provides no access to traffic on the A23 (from Horley) which will have to continue to access the North Terminal via the South Terminal Roundabout. It seeks assurance that appropriate modelling will be undertaken to ensure the phasing of the traffic lights are such as to not cause a build-up of queuing traffic in the area.

- 1.17.2 The Council seeks more information on the potential impacts of the three right turn lanes from the North Terminal Roundabout to the A23 merging into a two lane road and states that it is unclear whether the A23 will be widened to three lanes up to Airport Way/M23 Spur.
- 1.17.3 The Council welcomes the widening of the A23 to three lanes approaching the Longbridge Roundabout heading north but expresses concern about traffic disruptions during the bridge widening.
- 1.17.4 The Council would like to see a comprehensive Cycle and Pedestrian Access Strategy as part of the DCO application to ensure that new access paths feed into existing pedestrian and cycle routes. It also seeks assurance that people can safely access both terminals from both sides of the A23.
- 1.17.5 The Council believes that, given the removal of vegetation, noise barriers will be required along the A23. In addition to a 40mph speed limit, the Council requests the use of a 'low noise' road surface to assist in mitigation of noise impacts.
- 1.17.6 The Council requests that details of the noise envelope are included within the DCO application or subject to a further round of pre-application consultation.
- 1.17.7 The Council states that the existing airport car park land proposed to be substituted as mitigation for the loss of land at Riverside Garden Park is not of comparable quality or locationally suitable compared to what would be lost and suggests significant mitigation for this is included in the DCO.
- 1.17.8 The Council requests more detail to explain the need for work proposed to widen the A23 Brighton Road Bridge over the River Mole. It suggests that avoiding undertaking this work would reduce the need to remove vegetation and hence lessen the impact on Riverside Garden Park.
- 1.17.9 The Council raises concerns around use of the temporary access route that is proposed via Woodroyd Avenue due to the impact it might have on local residents. It is also concerned about whether the wider implications of the proposed highway alterations and the resultant increase in traffic numbers have been taken into account, especially for surrounding communities.
- 1.17.10 The Council asks that a Construction Phasing Plan is included as part of the DCO as well as a Construction Travel Plan.
- 1.17.11 The Council supports use of more sustainable modes of transport but recognises limiting car park numbers will put pressure on local residential roads.
- 1.17.12 It queries whether the Applicant has modelled traffic numbers in a post-Covid world, given car usage has increased.
- 1.17.13 The Council asks how the green open space (previously car park B) proposed as compensation for the loss of land in Riverside Garden Park will be accessed.
- 1.17.14 The Council expresses disappointment that there is a need for two balancing ponds to facilitate

the proposed road improvements. It notes that a new footbridge appears to provide access across the River Mole and seeks clarification that the Applicant will allow public access of this area. It also asks who will have responsibility for the management of this area.

1.18 Kent County Council

1.18.1 Kent County Council opposes the Project as it is not compatible with their Policy on Gatwick Airport.

1.18.2 The Council notes that it is important to provide sustainable access to the airport for staff and customers. It states that the proposed approach to the Airport Surface Access Strategy (ASAS) appears logical but proposes an alternative modelling approach of 'backcasting' where a future scenario is agreed, and the measures are formulated to reach that target. The Council suggests that if this approach is used, stretch targets are included. It also notes that it expects the ASAS to include measures on taxis serving the airport.

1.18.3 The Council supports the studies into regional coach services and would like to see more information on these proposals when available.

1.18.4 The Council requests that the Applicant work with Network Rail and train operators to lobby for improvements to the wider rail network including supporting the case for a Canterbury West to Gatwick via Ashford International, Tonbridge and Redhill service.

1.18.5 The Council states that while it is true that the emissions from aircraft are, to a large extent, out of the control of the Applicant, bans on the most polluting aircraft could be implemented in the same way as for the noisiest.

1.18.6 The Council believes the Project's environmental and policy assessments will need to be amended in light of Jet Zero. It believes the Applicant should go beyond the carbon reduction targets and scope of measures in Jet Zero to reduce emissions. It states that even though the increased capacity at Gatwick Airport is included within the Jet Zero modelling, this should not be an indication of the acceptability of the Project. The Council requests more detail around how the Applicant will meet Jet Zero, particularly in terms of Sustainable Aviation Fuel, its reliance on other sectors to offset carbon emissions, and its specific fleet mix and operators (for example, freight/passenger aircraft, size of aircraft, age of aircraft).

1.18.7 The Council notes the establishment of the noise envelope group. It welcomes the refresh of the socio-economic studies and requests a disaggregated breakdown of the impacts, suggesting this will improve the understanding of the economic impacts of the airport on Kent.

1.19 Leigh Parish Council

1.19.1 Leigh Parish Council expresses concern that the highway improvement proposals and an increase in parking spaces will have a significant impact in terms of congestion, pollution and noise. It notes that it is unclear how these will impact the wider road network in the region, including routes through Leigh.

1.19.2 The Parish Council notes the water management proposals but is concerned about the potential impacts on the River Mole downstream at Leigh. It notes that Thames Water is in the process of reviewing sewage arrangements at Crawley but has not reviewed further afield.

- 1.19.3 The Parish Council believes that changes in behaviour influenced by climate change concerns and the pandemic have changed people's requirement for air travel and suggests these factors should be included within the assessments.
- 1.19.4 The Parish Council welcomes the formation of the noise envelope group, noting that it seeks to ensure there is no increase in flight frequency or change in over-flying.
- 1.19.5 The Parish Council recognises that there will be some local economic benefits with the Project, but is concerned about effects in other areas, for example available housing for workers and commutability (road vs sustainable modes). It suggests incentives should be put in place to encourage workers to use sustainable transport modes.
- 1.19.6 The Parish Council considers that the proposals do not take into account local views on the environmental impact of the proposals in terms of CO2 emissions.

1.20 **Lingfield Parish Council**

- 1.20.1 The Parish Council accepts the role that Gatwick plays locally in terms of employment and bringing prosperity to the area but is concerned about the reliance on fossil fuels and the climate impact of the Project. On this basis, the Parish Council objects in principle to the proposals.
- 1.20.2 Lingfield Parish Council notes that any increase in the number of air traffic movements is as a consequence of increased passenger numbers, which will impact on the village and surrounding countryside by increasing the traffic accessing the airport.
- 1.20.3 The Parish Council states that the rail network is already at capacity and cannot accommodate any more trains, making rail travel unappealing to air passengers with luggage and resulting in continued use of the car to get to the airport.
- 1.20.4 The Parish Council believes encouraging passengers and staff to use active travel will be a challenge due to the unsocial hours that many people are accessing the airport. It considers that the proposed amended reduction in on-site car parking is unrealistic.
- 1.20.5 The Parish Council notes that even during the day, ambient noise is low due to the absence of heavy industry and surrounding countryside.
- 1.20.6 The Parish Council notes that use of off-site parking locations has risen in popularity, especially with the introduction of valet parking, which results in cars being parked in fields around the area that do not have planning permission. It recognises that the Applicant will have little control over these sites.

1.21 **London Borough of Bromley**

- 1.21.1 The London Borough of Bromley requests regular updates from the noise envelope group about increased noise and air traffic, as it has concerns about more air traffic being brought into the skies above Bromley.

1.22 **Mid Sussex District Council**

- 1.22.1 Mid Sussex District Council has concerns that the Summer 2022 Consultation went ahead when evidence demonstrating the need for airport expansion has not been provided to satisfy the Local

Authorities, and that matters raised in the Autumn 2021 Consultation have not been answered.

- 1.22.2 The Council believes the impact of FASI-South was not acknowledged and taken into account and that the increase in capacity at Gatwick would mean that use of Noise Preferential Route 9 (26 WIZAD) would increase to achieve the suggested hourly movement rates. It requests that the Applicant is transparent about how the impact of the Project will later use flight paths.
- 1.22.3 The Council recognises that it will not experience direct impacts as a result of the proposed road changes, however it seeks to understand how the changes will alter traffic flows around the airport. It welcomes the commitment to monitoring traffic flows and believes this should be secured through the section 106 agreement. The Council also believes that alongside monitoring there should be additional mitigation measures put in place should impacts not be as anticipated.
- 1.22.4 The Council does not believe that more on-site parking will stop unauthorised off airport parking and suggests the Applicant should provide financial support to Local Authorities (via Section 106) in defending enforcement action. It also considers that excessive parking will not support the Applicant's Sustainable Transport Strategy and suggests this strategy should be approved by Highways Authorities and National Highways prior to setting the parking level. It also suggests a monitoring system is put in place to ensure that a balance is struck between modal shift and avoiding an increase in unauthorised parking.
- 1.22.5 The Council found the number of spaces and locations confusing to follow and requested clarity on the proposals. It agrees that on-airport parking is the most sustainable strategy, but notes there is a need for a detailed parking strategy in line with the Project passenger growth figures. It expresses concern about unauthorised off-airport parking and the future management of these parking locations.
- 1.22.6 The Council recognises that parking demand is likely to increase and requests that the Applicant provide parking based on passenger growth numbers. It does not consider it necessary for the Applicant to provide a further 3,000 spaces to offset the impacts of any enforcement action.
- 1.22.7 The Council does not believe the proposals for 2,500 robotic spaces should be included in the baseline as no formal consultation has taken place on these proposals through the General Permitted Development Order Process.
- 1.22.8 The Council is disappointed to note that local bus enhancements have been limited to a number of routes within Crawley and suggests further investment into wider bus connectivity for residents in northern Mid Sussex is required to provide a real choice of sustainable travel modes. It would like to see more consideration given to improving public transport links from Mid Sussex to the airport. The Council notes that current bus routes (291 and 400) are not realistic options for those wishing to use the bus to get to Gatwick.
- 1.22.9 The Council welcomes the work the Applicant is doing with Network Rail to ensure that rail travel from the airport to Mid Sussex is a realistic option and reasonable alternative to using the car for both employees and travellers.
- 1.22.10 The Council suggests an overarching Transport Strategy needs to be developed to include the parking strategy and forecourt strategy. It believes this strategy should be focused on achieving a modal shift to sustainable and active travel modes. It notes that the potential consequences of

price increases for parking and forecourt drop offs needs careful consideration as they may result in unauthorised off-airport parking and an increase in passenger drop-offs taking place in unsafe locations.

- 1.22.11 The Council would like to understand the methodology behind the proposed increase in hotel bed numbers and the economic impacts of the new hotels so it can better consider potential impacts on the labour market. It believes that the Applicant should be doing all it can to meet hotel needs on-site. It also requests more detail on the assessment work undertaken for office demand.
- 1.22.12 The Council welcomes biodiversity improvements but seeks further information on how this forms part of the Biodiversity Strategy for the airport. It also suggests plans are required to outline how this will be maintained and managed and that this should be part of the s106 provision.
- 1.22.13 The Council seeks more information on the new treatment works. It also suggests the issue of water neutrality needs further discussion and confirmation from water companies that the issue of water neutrality will not impact water supply at the airport.
- 1.22.14 The Council welcomes the work undertaken to better assess and mitigate the impact of the Project on the landscape and High Weald AONB in particular.
- 1.22.15 While welcoming the proposed areas of habitat creation (within car park B, Museum Field and land south of Church Meadows), the Council asks how they fit into an overarching strategy for biodiversity enhancement at the airport. It also states that there is no indication of the biodiversity 'gain' these will bring or how they will be managed and maintained.
- 1.22.16 The Council notes that the Applicant has compared its 2047 demand projections with the DfT Jet Zero updated national forecasts for 2050 and finds this to be misleading.
- 1.22.17 The Council is disappointed that the Economic Impact Assessment has not been updated in relation to carbon values and was not available prior to the Summer 2022 Consultation. It notes that it expects the Applicant to clearly set out how it will comply with the Government's Jet Zero Strategy.
- 1.22.18 The Council welcomes the concept of a noise envelope but states that the noise envelope group has not been effective in developing common ground that satisfies all stakeholders. It believes the Applicant should offer an expanded combination of parameters to give communities certainty over noise impacts from the growth of air traffic. The Council considers further work is required on the daytime noise envelope metrics.
- 1.22.19 The Council expresses concern that the socio-economic impact in the North West Sussex HMA has not been properly addressed. It welcomes work to better understand construction employment and notes that the Applicant needs to take existing construction projects into account as construction skills are in high demand. The Council notes that further work is being undertaken to assess the potential impacts of the temporary workforce on local housing needs and how their social and health needs will be met.
- 1.22.20 The Council notes that the Construction Management Plan should include a traffic management plan for truck movements (to avoid impact on rural roads as much as possible).
- 1.22.21 The Council is keen to work with the Applicant on its Employment, Skills and Business Strategy to ensure that local people and businesses see the benefits of the growth of the airport.

- 1.22.22 The Council believes that time is needed for key stakeholders to review the Mitigation Route Map and would like mitigations to be agreed and secured prior to DCO submission but recognises there will be areas that cannot be agreed.
- 1.22.23 The Council suggests that TWGs should be timed for when additional work is complete to ensure these sessions are meaningful.
- 1.22.24 The Council disagrees with the approach being taken to air quality mitigation, as it suggests mitigation will not be required unless modelling shows a significant adverse effect caused by the Project. It requests further discussion to develop a fair and reasonable package of suitable mitigation measures to address the concerns raised around air quality and suggests these can be agreed and secured via the s106.
- 1.23 Mole Valley District Council**
- 1.23.1 Mole Valley District Council appreciates the consultation extension from 28 days to six weeks, but states it was not long enough to consult on the scale of the proposed changes and to allow the Council to undertake internal processes.
- 1.23.2 The Council is disappointed that the consultation was virtual only and there were no in person events. It believes the consultation was 'neither thorough nor appropriate'.
- 1.23.3 The Council recognises that the Applicant held meetings to brief local authorities but notes that these were held three weeks into the consultation and allowed little time for members to form views and inform the Council's consultation response.
- 1.23.4 The Council raises concerns that local authorities have not been involved in discussions with National Highways about the highways proposals. It believes more information is required on the need case for these highway improvements and requests more detail on demand forecasts and capacity assessments. It also raises concerns that traffic modelling is not complete.
- 1.23.5 The Council supports the Longbridge Roundabout widening works to help ease traffic flows in the airport area and notes the proposal to retain the mature trees at Longbridge Roundabout and London Road for aesthetic reasons.
- 1.23.6 The Council seeks clarity on the number of new car parking spaces and agrees that new parking should be on-site as this is the most sustainable strategy. It suggests the Applicant should demonstrate the need from growth in passenger numbers only, and not to include unauthorised off-site parking in the parking calculations.
- 1.23.7 The Council considers the proposals for the 2,500 robotic spaces should be included as part of the DCO.
- 1.23.8 The Council suggests the Applicant should provide financial support for a Planning Enforcement Officer to help deal with unauthorised off-site parking.
- 1.23.9 The Council suggests a detailed parking strategy is needed to consider the car parking requirements of the Project alongside the modal share target as well as ensuring plans do not encourage unauthorised off-site parking.
- 1.23.10 The Council welcomes the focus on increasing the use of sustainable transport and the development of an Airport Surface Access Strategy to examine the key areas that will require

investment and changes. It suggests a segregated and well-lit pedestrian and cycle lane from the Longbridge Roundabout to the North Terminal should be included and raises concerns that the amendment to remove the cycle path element from the proposed ramp into Riverside Garden Park has not been highlighted in the consultation.

- 1.23.11 The Council states that investment should be directed to the Gatwick Express service to justify its cost. It suggests that the service should be fast, with minimal stops, and with at least 50% of services being non-stop to and from Gatwick. The Council suggests investment in the Reading-Redhill line to enable residents to travel to Gatwick by train.
- 1.23.12 The Council requests that a Method of Construction Statement should include the routes that construction staff will take, and any vehicles related to construction should be encouraged not to use any of the narrow local country lanes.
- 1.23.13 The Council retains its preference for the Option 1 location for the CARE facility but asks that detailed drawings showing the design and elevations of the building and flue be shared to allow for further comment. It also suggests lowering the CARE facility building into the ground as this would reduce the height of the biomass boiler flue and asks whether food separation is being considered within the CARE facility.
- 1.23.14 The Council raises concerns that the de-icer contaminated runway water tank may need to discharge into the River Mole at times of surge and suggests greater capacity is required to reduce this risk. It also suggests all water run-off from the airport should go through a water treatment plant.
- 1.23.15 The Council appreciates the commitment to halving the water consumption per passenger and notes that the Crawley Sewage Treatment Plan is at full capacity and will need to be upgraded prior to any passenger increase.
- 1.23.16 The Council states that work on the A23 London Road will reduce the number of mature trees screening the road and habitat for wildlife, and suggests a commitment be made to planting semi-mature trees and consideration given to construction of a natural bund. It also requests more information on where post construction work spoil will go.
- 1.23.17 The Council continues to support the creation of an enhanced natural habitat on Museum Field as part of the River Mole flood alleviation plans. It also supports the proposals to create further green space on land south of Church Meadows.
- 1.23.18 The Council notes that the proposed approach to combating carbon relies on the success of the Jet Zero strategy and states that it is concerned this passes responsibility to others. It also questions whether carbon trading schemes work as references within the Jet Zero consultation. The Council suggests the only way to prevent future carbon emissions is to a) use sustainable aviation fuels; b) use efficient planes, c) use fewer planes or d) use a combination of these options.
- 1.23.19 The Council notes that a number of its concerns from the previous consultation are still relevant, including around the emissions of arriving flights, the importance of taking into account local authority climate change action plans, and that emissions are being underestimated as the assessments do not include non-CO2 aviation effects and micro-particulates.

- 1.23.20 The Council recognises that more intrusive levels of traffic noise are related mainly due to speed and notes the inclusion of proposals for a reduction in speed limits, which it hopes will result in a reduction in noise impact. It notes that this may mean that noise barriers are not needed at Riverside Garden Park, but states that if noise barriers are needed, consideration should be given to a noise bund which can also be an ecological improvement.
- 1.23.21 The Council requests an assessment of receptors at Longbridge Roundabout and where noise is above the significantly observed adverse effect level (SOAEL) be included as part of the Environmental Statement.
- 1.23.22 The Council requests more information on the frequency of aircraft engine ground running and suggests a cap is imposed, especially at night. It seeks more detail on the north-west noise bund, in terms of location and detail of the bund itself and would like to see the assessment and options for the bund prior to it being included in the Environmental Statement.
- 1.23.23 The Council considers information on noise to be insufficient for it to assess the location of the CARE facility. It asks for more information on the route the vehicles will be taking to get to the CARE facility as well as the number and types of vehicles who will be accessing it.
- 1.23.24 The Council seeks confirmation that there will be no night working at the CARE facility and that it will only be processing Gatwick's waste. It also seeks assurance that the facility has been accounted for in the air quality model.
- 1.23.25 The Council requests that the Applicant considers the increase in housing needs as a result of the Project.
- 1.23.26 The Council notes that the Applicant has compared its 2047 demand projections with the DfT Jet Zero updated national forecasts for 2050 and finds this to be misleading. It notes that Gatwick's projected growth is almost double the rate of growth projected nationally, implying a substantial increase in market share which would be at the expense of other airports and would need to be accounted for at the very least by displacement allowances in the economic assessment. It states that with growth front loaded to the period to 2032, the Project benefits are brought forward and will skew the economic appraisal.
- 1.23.27 The Council believes the impact of FASI-South should be acknowledged and taken into account. It considers that the increase in capacity at Gatwick would mean routes which had not previously seen frequency would experience significantly more air traffic than at present.
- 1.24 **National Highways**
- 1.24.1 National Highways recognises the importance of the engagement undertaken with the Applicant and believes good progress is being made. It states that there is still work to be done ahead of DCO submission and refers to feedback provided in the Autumn 2021 Consultation.
- 1.24.2 National Highways states that robust demand and traffic modelling is essential to gauge the predicted usage of the road network and understand the impacts the proposals will have and notes that the data has not been provided in the consultation. It requests that this data and mitigation measures are provided and agreed with National Highways as soon as possible.
- 1.24.3 National Highways states it has not seen evidence (through modelling) that the Project will not

have a detrimental impact on the safe and effective operation of the wider road network. It is therefore unable to confirm whether further improvements beyond the current limits of the proposed highway enhancements are necessary.

- 1.24.4 National Highways states that the proposed mitigation measures must be shown to provide the ability for future enhancements to accommodate growth in the local road network if required.
- 1.24.5 National Highways acknowledges the extensive work that the Applicant has undertaken since the Autumn 2021 Consultation as a result of feedback received. However, it states that further work is required to demonstrate that the updated proposals can operate safely and effectively.
- 1.24.6 National Highways seeks further information about the impact of construction on the road network.
- 1.24.7 National Highways states that there are further commercial discussions which need to take place ahead of the DCO submission including payments, land acquisition and any necessary agreements and consents which will be required to satisfy the requirements in the DCO. In addition, it is awaiting feedback from the Applicant on the Memorandum of Understanding (MoU).
- 1.24.8 National Highways states that the Applicant must demonstrate that the methodology used to determine the modal split and parking provision is reasonable and achievable.
- 1.24.9 National Highways welcomes the reconsideration of parking provision but requests more detail about how this figure has been calculated as well as how it supports the aspiration of a 60% sustainable modal split. National Highways also seeks information on how the Applicant will incentivise the use of sustainable travel and what measures will be put in place if it is not successful.
- 1.24.10 National Highways requests further information on how the Applicant will manage the timing of car park projects to accommodate growth at the airport while also not providing more spaces than required or displacing car parking to unsafe locations.
- 1.24.11 National Highways notes that an additional 250 hotel beds are proposed and requests analysis of the impact this change will have on the road network.
- 1.24.12 National Highways considers the proposed declassification of the M23 Spur road from motorway to all-purpose trunk road will better reflect the nature and geometric characteristics of the road. It also considers the inclusion of a third lane eastbound to provide capacity, to be acceptable subject to the Applicant settling the outstanding requirements. However, it does require the lanes to match the widths of the westbound carriageway, which will ultimately need to involve widening of the existing carriageway.
- 1.24.13 National Highways notes it has concluded that, from a design point of view, the proposed North Terminal Roundabout is the most acceptable solution for the road network.
- 1.24.14 National Highways states that the design proposals for the South Terminal Roundabout are acceptable in principle from a design perspective. It notes that the intention to use land north of the roundabout as a temporary construction compound will require an additional temporary arm off the roundabout and states that this will need additional construction assessments to understand the impact on the road network. It states that the applicant will also need to demonstrate that a temporary access can be provided safely.

- 1.24.15 National Highways note that a third lane has been added to the westbound Airport Way providing extra capacity and resilience and the design is accepted in principle.
- 1.24.16 National Highways notes that it has a number of obligations to the Secretary of State in relation to environmental performance and will seek to ensure that these are not adversely impacted by the Applicant's highways works. It also notes that the revised highway improvements will result in additional loss of vegetation and any planting within the highway boundary will need to offset adverse impacts arising from the highway works.
- 1.24.17 National Highways states that the Applicant needs to demonstrate that 'no net loss' is achieved in relation to biodiversity net gain. It notes that consideration must be given to how biodiversity net gain can be achieved for the proposed highways works.
- 1.24.18 National Highways notes that the impacts of surface water on the road network as a result of the proposed changes are reported as "not significant" but assessment work is not complete.
- 1.24.19 National Highways seeks clarification on any new or materially different significant effects from those set out in the Autumn 2021 Consultation as the consultation documentation says there are none, but table 2.1 and Appendix 4 detail them.
- 1.24.20 National Highways seeks further information about the impact construction will have on the road network as the Spoil Strategy, Construction Travel Plan and Construction Traffic Management Plan are not yet available.
- 1.25 NATS**
- 1.25.1 NATS has reviewed the proposals, in particular the roadworks along the M23 Spur road, Airport Way and Longbridge Roundabout. It has not identified any impact upon its infrastructure and operations and has no objections to the works.
- 1.26 Network Rail**
- 1.26.1 Network Rail notes that the Applicant will need an Asset Protection Agreement as a result of the proposed highways changes having a greater interface with its infrastructure.
- 1.27 Nutfield Parish Council**
- 1.27.1 Nutfield Parish Council notes that existing junctions and highways are already operating at over-capacity and, whilst improvements may reduce levels on existing (pre-Covid) use, they will not cater for the increases in traffic associated with passenger numbers as a result of the Project.
- 1.27.2 The Parish Council states that the idea that staff will use public transport instead of cars is flawed in terms of convenience, cost and human nature. It says workers do not all live locally and many travel long distances from varying locations on 24-hour shifts. It acknowledges that the Applicant will promote the use of public transport with employees.
- 1.27.3 The Parish Council considers that the Applicant has not made a valid case for using the northern runway, noting that Heathrow has been selected to provide extra runway capacity in the southeast.
- 1.27.4 It raises concerns over carbon and other emissions as many mitigations rely on technological

advancements and believes that the Applicant has not taken account of the Environment Act.

1.28 Reigate and Banstead Borough Council

- 1.28.1 Reigate and Banstead Borough Council states that it would have preferred a 12-week consultation period.
- 1.28.2 The Council notes that significant work has been undertaken since the Autumn 2021 Consultation. It states that it has no objections to the proposed changes at the M23 spur other than to note the change from a motorway to a highway would mean maintenance would fall under Sussex County Council instead of National Highways.
- 1.28.3 The Council notes that the proposals do not include a road linking the works compound to the South Terminal junction and suggests this road should be included given the scale of the plant and transit services that will be required during construction. It also says it is unclear as to when the works compound drainage pond will be constructed as the current plan shows it encroaching on the Strategic Employment Site.
- 1.28.4 The Council seeks more detail about the noise barriers proposed for the flyover and also asks whether the junction will be lit as it is currently. It asks why a safe cycle path has not been included within the South Terminal Roundabout and notes that the new bridge at Balcombe Road should be wide enough to support cycling and walking.
- 1.28.5 The Council requests more information about the impacts of noise and light on local residents from the North Terminal junction. It also seeks confirmation that the effects of wind turbulence have been taken into account as a result of the noise barriers.
- 1.28.6 The Council notes that a left-hand turning is proposed onto the A23 London Road and states a preference for this not to be included due to the impact of vehicles moving onto local roads. It believes that using this area for a cycleway linking Horley with the airport would encourage more airport employees to use it.
- 1.28.7 The Council seeks clarity on the proposed clearance that would take place to widen the lane around the roundabout and whether work along with the new flood pond and works compound would function together. Clarity is sought as to the timeline of these projects and how vegetation loss would be mitigated.
- 1.28.8 The Council queries the need for the existing slip road at Longbridge Roundabout (Horley side joining A23 eastbound) to be widened.
- 1.28.9 The Council notes the proposals for the new footpath to go into Riverside Gardens and agrees it would provide a safer environment for cyclists and walkers. However, it asks for more detail on the environment mitigations so it can undertake a full review as the land take for the works is significant. It also recognises that the footpath won't be lit to reduce ecological impact but notes this may make it unsafe, particularly in the winter months.
- 1.28.10 The Council notes it has invested heavily in Riverside Gardens to make it a pleasant place for the local community and states that it should be financially compensated for the harm that will be caused to it by the Project.
- 1.28.11 The Council states that bridge widening at the River Mole and road widening up to Woodroyd

Avenue needs to be undertaken sensitively to enhance biodiversity and access, while not disrupting traffic.

- 1.28.12 The Council is concerned about the environmental impacts of the Balcombe Bridge widening, specifically the loss of hedgerow and vegetation and requests more detail be provided.
- 1.28.13 It also requests that the proposed detour of the Sussex Border footpath of 500m is temporary and advance notice of the detour and effective signing is provided.
- 1.28.14 The Council seeks clarification of car parking numbers and notes that it believes construction of the car parks should only occur when the sustainable travel mode targets are met. It recognises that the Applicant has no role in enforcement of unauthorised parking but requests a parking strategy be developed.
- 1.28.15 The Council supports the move towards more sustainable travel modes but believes the 60% target is ambitious. It believes it is unclear what mitigation is proposed if the target is not met and suggests limiting the number of peak period flights until the 60% target is reached.
- 1.28.16 The Council broadly supports the proposed improvements to bus, coach and rail, particularly for earlier or later operating times and with more frequent services to give users confidence of arriving in time for flights.
- 1.28.17 The Council supports schemes which reduce car dependency and encourages the use of other transport modes. It notes that it would like to review the Construction Travel Plan ahead of DCO submission.
- 1.28.18 The Council considers the proposed hotel plans should be a local planning matter. It notes the reduction in office space and asks whether this reduction has been taken into account in the economic and employment modelling.
- 1.28.19 The Council is pleased to note that the Applicant has taken into account the latest Environment Agency climate change figures and that the number of flood mitigation measures have been reduced. It also notes that Environment Agency advice on a number of enhancements to support biodiversity are being integrated into the culverted section of the River Mole.
- 1.28.20 The Council supports the improvement of water quality and the additional water plant to the east of the Crawley Sewage Treatment Works. It notes that improving the water being discharged into the Gatwick Stream and River Mole is vital.
- 1.28.21 The Council has no objection in principle to the landscape proposals, apart from the proximity of the southern pond to the boundary.
- 1.28.22 The Council notes that the Project's Habitats Regulation is being updated to take account of changes to air quality modelling including ammonia emissions as a result of traffic.
- 1.28.23 The Council states it was disappointed that the Applicant would not fund an independent consultant to provide advice to the council to help understand the noise information. The Council also says it is disappointing that in some instances, the Applicant has declined to provide environmental information in a particular way.

1.29 Rusper Parish Council

- 1.29.1 Rusper Parish Council notes that the proposals will not directly impact the parish.
- 1.29.2 The Parish Council questions the reasoning behind the decision to reduce car parking spaces as it says it is far more convenient for people with luggage to get to the airport via car (and on return from travels to be able to immediately access their vehicle). It suggests that Covid-19 pandemic has reduced public transport use and there is evidence this may be a permanent trend. It suggests that while there is a cost to on-site parking, it is offset by the convenience of having a car there.
- 1.29.3 The Parish Council believes a reduction in on-site parking facilities will inevitably give rise to an increase in unauthorised off-site parking facilities.
- 1.29.4 It notes that construction of the Project will have an impact on local infrastructure, including increasing traffic on local roads as drivers seek to avoid congestion on the main routes. The Parish Council expresses concern about the impact on Rusper parish, which is already affected by rat runs and traffic on small country lanes. The Parish Council suggests making better use of the rail network and creating a local railhead offshoot from the existing line to bring materials in and out of the construction site.
- 1.29.5 The Parish Council notes the plans to produce a noise envelope and states that this is of significant interest given the parish's location at the west end of the proposed runway.

1.30 Salfords and Sidlow Parish Council

- 1.30.1 Salfords and Sidlow Parish Council is concerned that the proposed highway improvements do not consider the effects on the wider network of local roads. It states that the DCO should not be approved unless the West Sussex and Surrey County Councils are satisfied that the roads have the required capacity for the projected traffic.
- 1.30.2 The Parish Council believes that car parking is an important revenue stream for the Applicant and the increase in parking numbers will generate more income. It also considers that this will result in more traffic on local roads, adding to local congestion and pollution. The Parish Council asks for consideration of a Clean Air Order appropriate to the airport.
- 1.30.3 The Parish Council notes the proposals to encourage more staff to use public transport but believes this should be extended to cover all airport customers. It suggests discounted bus travel vouchers as part of flight packages to encourage this. The Parish Council also suggests allowing local buses to stop nearer the North Terminal entrance (as coaches currently do) as a way of supporting bus travel and asks why certain metrobus routes have not been mentioned in the proposals.
- 1.30.4 The Parish Council notes the mention of rail service improvements and requests more detail on this.
- 1.30.5 It notes proposals for a noise envelope and questions how this will be enforced. The Parish Council considers no new residents should be overflowed.
- 1.30.6 The Parish Council welcomes the design changes within the highway proposals that will increase natural light onto rivers and water courses to benefit the local environmental habitat.

1.31 Southern Gas Networks

1.31.1 Southern Gas Networks expresses concern that works associated with the proposals may potentially affect the integrity of its apparatus in the area and requests that all reasonable measures are taken to ensure that these are properly protected.

1.32 Surrey County Council

1.32.1 Surrey County Council says its response should be read in conjunction with comments from the Autumn 2021 Consultation.

1.32.2 The Council expresses disappointment that it has not been involved in discussions on the highway proposals despite being the local highway authority. It states that it has provided input into every technical note issued by the Applicant but is unsure how comments have been actioned.

1.32.3 The Council requests further information and clarification on the transport modelling, particularly the reduction of parking spaces and how this fits into the 60% mode share target. It also requests information on how the results of the modelling will be presented and the process for future modelling meetings.

1.32.4 The Council states it has previously raised questions about passenger growth forecasts as these feed into a range of areas including transport modelling, air quality and noise.

1.32.5 The Council states that it has made a number of comments previously which are relevant to this consultation, including the need for pedestrian signals at Longbridge Roundabout, the need for the timing and phasing of traffic lights to help with traffic congestion, the need for access to maintain the drainage ponds, and the need for clarification on the why there is not a right turn facility (on A23 London Road for north terminal).

1.32.6 Concern is expressed about the construction work to widen the River Mole bridge and the subsequent impacts this might have including congestion, worsening air quality and bus route reliability.

1.32.7 The Council expresses concern about the left turn at the North Terminal junction and asks for this to be removed. It also requests that a review of the layout of this junction be undertaken to ensure three streams of traffic can make the right turn simultaneously.

1.32.8 It questions whether the new signalised junction on the A23 could accommodate a pedestrian crossing on the west side to form part of the new active travel route linking Riverside Garden Park to the airport terminals.

1.32.9 The Council suggests that highway construction should be completed before the northern runway comes into use.

1.32.10 The Council believes the active travel route between Longbridge Roundabout and North Terminal should be segregated for the whole way and not a mix of segregated/shared. It welcomes the proposed route between the Crescent along the west side of the railway and through open space in place of car park B. However, it states that the existing route is too narrow at its start to accommodate cyclists and this should be addressed to ensure both cyclists and pedestrians can use the whole route safely. It asks for information about the southern end of the route and

provision of access to the South Terminal.

- 1.32.11 The Council believes better active travel links between South Horley and the existing/proposed new infrastructure to the east of the Brighton Main Line are needed. It also expresses concern about the lack of public transport routes west from the airport into Surrey and over-reliance on the North Downs Line.
- 1.32.12 The Council believes that the Gatwick Surface Access Strategy 2022-2030 has an ambitious mode share target of 60% and questions how this will be delivered when proposals build on existing plans and are focused on highway proposals and car parking.
- 1.32.13 The Council welcomes the reduction in car parking spaces and says that a parking strategy is needed which considers the Project in the context of mode share targets. It notes that Gatwick's intention is not to 'over-provide' parking and believes a mechanism should be put in place to ensure this. It raises the potential for waiving or capping parking-related permitted development rights.
- 1.32.14 It notes that the consultation asks whether the 3,300 spaces to replace off-airport unauthorised spaces should be included within parking proposals. The Council believes that there is a conflict with the sustainable surface access objectives if spaces removed through enforcement are automatically re-provided within the airport. It also states there is no guarantee of successful enforcement action by local authorities.
- 1.32.15 The Council believes there is significant difference in the robotic parking trial between 100 spaces to a permanent 2,500 and suggests the figures should be removed from the baseline.
- 1.32.16 The Council notes that Gatwick has compared its 2047 demand projections with the DfT Jet Zero updated national forecasts for 2050 and believes this to be misleading as most of the projected growth from the project is over the period to 2038 and is almost double or 50% greater than the rate of market growth projected nationally if compared to other airports.
- 1.32.17 The Council notes that Gatwick intends to update the carbon values used in the economic impact assessment to reflect the latest government values but is disappointed that this was not done as part of the consultation.
- 1.32.18 The Council expresses concern about the noise envelope group process and suggests that the chair of the group should be independent. In addition, it believes the timescales proposed by Gatwick are unrealistic, as Luton undertook similar work in 18 months whilst at Gatwick it was done in three months over the summer.
- 1.32.19 The Council believes that monitoring and review of the noise envelope should be periodic (five yearly or less), built into the process, secured through the DCO, and including consultation with key stakeholders as part of the review process.
- 1.32.20 The Council states that archaeology needs to be considered when designing ecological mitigation. It notes the environmental mitigation proposals at Gatwick Dairy Farm and says it would like to maintain separation between access to the farm and access to the green space.
- 1.32.21 The Council states that clearer and more detailed drawings confirming the extent of proposed vegetation removals are needed and figures within the consultation document and appendices are unclear. It acknowledges that Gatwick is still finalising proposals but points out a discrepancy

between the figures and written description in the Consultation Document.

- 1.32.22 The Council raises a number of queries about the viewpoints used within the consultation document and asks whether they show the full extent of the changes due to the proposals. In addition, it requests that photomontages be produced to better illustrate the impacts of the construction phases.
- 1.32.23 It believes the removal of trees at the Longbridge Roundabout, along London Road and the side of Riverside Park will impact local ecology and result in a loss of amenity and natural screening for local residents.
- 1.32.24 It expresses concern about the lack of engagement from Gatwick with Surrey County Council, as an affected landowner. The Council requests urgent detailed discussions to clarify the Project's land take requirements and the freehold interests within the proposed scheme boundary.

1.33 **Sevenoaks District Council**

- 1.33.1 Sevenoaks District Council believes the highway improvements will result in more passengers using cars to access the airport, which would have a detrimental impact on the district.
- 1.33.2 The Council welcomes the reduction in the number of proposed car parking spaces and greater focus on improving public transport for passengers and staff. It states that Gatwick needs to ensure that public transport alternatives are feasible to encourage passengers and staff away from their cars.
- 1.33.3 The Council says it welcomes the inclusion of Sevenoaks in the Airport Surface Access Strategy as an area where regional coach services are being reviewed and there is potential for improved links to Gatwick Airport.
- 1.33.4 It expresses support for the reinstatement of a direct rail service between Tonbridge and Gatwick (via Edenbridge) to improve links and reduce car use.
- 1.33.5 The Council welcomes the formation of a noise envelope group to work on the proposals to set limits on air noise. It reiterates support for a noise envelope to account for average noise contours at various dB levels and for a ban on flights within a set time period throughout the entire night-time period.
- 1.33.6 The Council says it would like to view the draft Carbon Action Plan to better understand Gatwick's proposed actions to reduce CO2 in advance of the DCO application.

1.34 **Tandridge District Council**

- 1.34.1 The Council says it welcomes the extension of the consultation from 28 days to six weeks but expresses concern about the use of only three deposit locations, none of which were within the Tandridge area. The Council believes the impact of the highways proposals would be felt across the Tandridge district and residents there should have the opportunity to be consulted on these.
- 1.34.2 The Council expresses concern that the consultation was virtual only and it believes this could limit the ability of some local residents to access the information about the proposals.
- 1.34.3 It believes the impact of the FASI-South review has not been taken into account and requests that the DCO process be slowed down so that it can be better aligned with this programme. The

Council believes that the FASI-South programme could affect the local road network, and this should be taken into account by Gatwick.

- 1.34.4 The Council notes that the highway improvements are located around the airport but says the knock-on effects on the highways within Tandridge district have not been taken into account. It expresses concern that local roads will be particularly affected during the construction period, as people seek alternative routes to travel to work.
- 1.34.5 It suggests that with the increase in aircraft movement outside of peak daytime hours, travellers and workers without access to public transport, will need to use cars to travel to the airport and will need places to park.
- 1.34.6 The Council welcomes the reduction in car parking spaces to focus on sustainable travel but says that a parking strategy is needed which includes the Project in the context of modal share targets and that considers offsite unauthorised parking sites.
- 1.34.7 The Council supports Gatwick's 60% modal shift target but believes it is unrealistic given that people are unlikely to want to travel on public transport with baggage and that the availability of public transport is limited across the region.
- 1.34.8 It expresses concern about the impact of the Project on the rail system, which currently has limited capacity.
- 1.34.9 It states that Gatwick has compared its 2047 demand projections with the DfT Jet Zero updated national forecasts for 2050 and believes this could be misleading as most of the Project's projected growth is over the period to 2038. It states that it is almost double or 50% greater than the rate of market growth projected nationally if compared to other airports. The Council notes that all of Gatwick's assumed growth is front loaded to the period to 2032 and beyond 2032 Gatwick's growth is slower than DfT's assumed national growth rates. It believes this has the effect of bringing forward the benefits and will skew the economic appraisal that has been presented.
- 1.34.10 The Council expresses concern that there has been a lack of consideration of impacts on communities to the east of the airport, particularly Burstow, Smallfield, Lingfield and Dormansland.
- 1.35 **Thames Water**
- 1.35.1 Thames Water notes there are several assets affected or within the land boundary and states that some are incorrectly mapped as private assets.
- 1.35.2 Thames Water notes that the airport currently drains to both Horley and Crawley sewage treatment works and as a result of the proposals there may be an increase in discharge into the network. It says that further assessments will be needed to identify the most appropriate drainage strategy for the northern runway proposals.
- 1.36 **Tunbridge Wells Borough Council**
- 1.36.1 Tunbridge Wells Borough Council believes the Project is unnecessary and should not go ahead due to the predicted increase in carbon emissions as well as the impacts from construction of the

road and supporting infrastructure. It expresses concern that increasing traffic and road use will have a negative impact on people living near to the airport and a wider impact on roads across the southeast.

- 1.36.2 The Council believes the transport proposals should be more focused on sustainable public transport and not car travel. It suggests there should be more rapid electric charging points in the proposals.
- 1.36.3 The Council believes there are no appropriate mitigations for noise or other impacts that will arise from the proposals and expansion is unsuitable given the impact that greenhouse gas emissions are having on people and the climate.

1.37 Wealden District Council

- 1.37.1 Wealden District Council is keen to ensure that the impacts of the construction phases are managed and mitigated. It says it supports the preparation of a Construction Traffic Management Plan to reduce construction traffic and minimise the impact on the highway network in Wealden. In addition, the Council says it would support measures to reduce traffic through sensitive locations near to the Ashdown Forest Special Area of Conservation /Special Protection Area and along the A22.
- 1.37.2 The Council supports Gatwick's commitment to increasing the overall share of passengers and staff using sustainable forms of transport to/from the airport. It supports, in principle, fewer car parking spaces within the airport boundary but believes that sustainable alternatives are needed if the modal transport targets are to be achieved. It states that currently there are poor public transport links from Wealden to the airport and this makes people reliant on cars. It supports proposals for Gatwick to work with bus and coach operators to provide an appropriate increase in service frequency across the Wealden area.
- 1.37.3 The Council strongly supports the proposed improvements to the electric vehicle charging infrastructure and suggests this could be expanded across the Wealden district. It says it would seek support from Gatwick to implement this as it is likely that many more Gatwick staff and visitors will be driving electric vehicles in the future.
- 1.37.4 The Council believes Gatwick should make every effort to reduce carbon emissions arising from the Project.
- 1.37.5 The Council supports measures to reduce the impact of noise on residents in the district. It states that an appropriate balance needs to be struck between the economic benefits of the Project and the potential impacts on local amenities and communities nearby to the airport.
- 1.37.6 The Council states that it supports the 'noise envelope' as it believes it will provide a guarantee that noise levels will be lower than they were in 2019.
- 1.37.7 In terms of wider landscape issues, the Council supports the intended work to clarify the tranquillity impact assessment methodology and the assessment of effects on the High Weald Area of Outstanding Natural Beauty (AONB) special qualities.

1.38 Westerham Town Council

1.38.1 Westerham Town Council believes a large underground car park located near the terminal could replace all off-site parking. It believes this could also accommodate future growth and enable passengers to walk directly to the airport terminals. It suggests this would also reduce the need for buses transporting passengers to and from the car parks and help Gatwick to reduce its carbon footprint. The Council acknowledges this would be a long-term solution with potentially significant cost.

1.39 West Sussex Clinical Commissioning Group

1.39.1 West Sussex Clinical Commissioning Group says it does not have any comments on the proposed highway improvements.

1.40 West Sussex County Council

1.40.1 West Sussex County Council believes the proposals have not included sufficient measures to promote sustainable modes of transport to staff and passengers. It considers that Gatwick is therefore unlikely to achieve its modal transport target.

1.40.2 The Council expresses concern about the safety of the highway proposals as mitigations centre on the reduction of speed from 50mph to 40mph and this is not yet guaranteed as it would need to be subject to a separate consultation process. It believes the proposed highway mitigation may also increase journey times (including for emergency response vehicles) and may result in increased traffic on local roads.

1.40.3 It expresses concerns about the extent of vegetation and habitat loss through direct land take and construction works. It suggests that if there is no alternative to their removal, then trees should be replaced on a 2:1 basis. The Council says it is not currently clear how this vegetation loss would be compensated for, or how Biodiversity Net Gain would be achieved. It believes land take should be minimised, and further work needs to be undertaken to avoid the loss of sensitive habitats.

1.40.4 The Council expresses concern about the ecological impacts of the works proposed in the vicinity of the River Mole. It states that the highway scheme proposals are not accompanied by ecological information or cross referenced to the original PEIR and this makes it difficult to assess the potential ecological impacts.

1.40.5 The Council believes further opportunities should be sought for ecological enhancements and suggests that road lighting around bridges over the Rover Mole could be reduced to improve bat corridors.

1.40.6 The Council says it is difficult to understand the potential impacts to Public Rights of Way (PRoW) as little detail has been provided by Gatwick. It states that any temporary diversions put in place during the construction period would need to be lawful and well signposted. It says it would be useful to know if the various footpaths that will link to open spaces will be dedicated as a definitive PRoW and who would manage them.

1.40.7 The Council says it supports in principle the improvements to the existing footpath network and enhancements to encourage sustainable transport and connectivity to open spaces, however it

says it is unclear how these will link with the existing PRow and highways network.

- 1.40.8 The Council states that at this time it can't effectively review the proposals until sufficient evidence and technical detail on design standards is made available by Gatwick. It states that until it receives this information, it can't support the project.

1.41 Wisborough Green Parish Council

- 1.41.1 Wisborough Green Parish Council believes the proposals to improve the highways around the airport will lead to an increase in congestion as more traffic will use this extra capacity. It believes the highway proposals will contribute to climate change and will not help to achieve other environmental targets (including a modal shift to walking, cycling, buses and trains). The Parish Council notes that the modelling is still ongoing and believes that the consultation has been undertaken too early. It believes the highway improvements are unnecessary and suggests that any growth at Gatwick Airport should be supported by public transport only.
- 1.41.2 The Parish Council believes the walking and cycling path from the Longbridge Roundabout along the A23 towards Gatwick should be improved not removed as it is often used in winter months when people do not want to go through Riverside Gardens for safety reasons.
- 1.41.3 It believes that Gatwick fails to consider how the predicted increased traffic on the main road network will affect the surrounding local roads and measures should be introduced to reduce this traffic.
- 1.41.4 The Parish Council says it looks forward to reviewing the draft Airport Surface Access Strategy (ASAS) to better understand how Gatwick will increase use of sustainable transport by passengers and airport staff. It believes the proposed improvements to rail, bus and active modes within the Project are unclear. It states that the ASAS should set-out what is needed to make public and active transport modes more attractive, so more passengers and staff leave the car at home.
- 1.41.5 The reduction in car parking numbers is welcomed by the Parish Council, however it believes more detail is needed to understand the actual figures. In addition, it believes parking controls should be introduced to reduce off-site parking.
- 1.41.6 The Parish Council asks for more data on the CARE facility to understand what is being used in the biomass boiler.
- 1.41.7 The Parish Council does not support the removal of the mature trees at the Longbridge Roundabout and along London Road and Riverside Park, as replacement planting will not be an ecological enhancement but a loss of biodiversity. It believes there will also be a knock-on effect on residents as the trees currently shield them from the road and traffic noise.
- 1.41.8 The Parish Council expresses concern that there are currently no effective regulatory or other mechanisms available to reduce emissions from aircraft.
- 1.41.9 The Parish Council believes that the economic costs of the northern runway are not being accurately represented as the carbon values used in the first consultation were materially incorrect. It states that in the Autumn 2021 Consultation, Gatwick failed to quantify both the non-CO2 effects of air travel and climate change impacts of arriving aircraft. It expresses concern that

this has not been included in the Summer 2022 Consultation and believes that a further round of consultation is needed which includes the correct figures.

1.41.10 The Parish Council believes the engagement activities on the noise envelope have been inadequate given the likely significant impact of noise on local residents, and states that this is not compatible with good practice and does not comply with CAA guidance.

1.41.11 The Parish Council believes the noise envelope group should have an independent chair and states that the timescales proposed are unrealistic, as at Luton similar work took 18 months and at Gatwick it was undertaken in three months over the summer.

1.42 [Woldingham Parish Council](#)

1.42.1 The Parish Council objects to the proposals due to the predicted increase in road and air traffic, and subsequent environmental impacts. It expresses particular concern about the impact of noise upon residents of the parish.

2 Summary of responses from Section 42(1)(d) consultees by theme

2.1 Road improvements – design and mitigation

Support for the proposals - Persons with Interest in Land subject to the targeted consultation

- 2.1.1 Some section 42(1)(d) consultees (referred to throughout as persons with an interest in land, or PILs) offer caveated support for the updated road improvement proposals, stating that while they welcome improvements to bus services, cycle and pedestrian facilities and clarification on the extent of temporary and permanent land take, more precise plans are still needed.
- 2.1.2 One other PIL expresses support for the assessment on the impact of Public Right of Way (PRoW) 367, commenting that they agree that there would be major long-term adverse impacts on the landscape and its recreational use.

Support for the proposals - PILs not subject to the targeted consultation

- 2.1.3 A small number of PILs express general support for the updated road improvement proposals, without providing further details.
- 2.1.4 Another PIL agrees with the assessment on the impact of PRoW 367, where they agree that there would be major long-term adverse impacts on the landscape and its recreational use.

Concerns about the proposals – PILs subject to the targeted consultation

Design and layout

- 2.1.5 One PIL expresses concern about the design and layout of the M23 Spur and the South Terminal Roundabout. In relation to the M23 Spur, they express concern that the widening of bridge structure over Balcombe Road has the potential to impact upon the delivery of access to Gatwick Green's draft strategic employment site allocation. In relation to the South Terminal Roundabout, they feel that the proposals missed the opportunity to provide more direct links to Gatwick station and the South Terminal via Balcombe Road, which could have included bus access and cycle/pedestrian routes.
- 2.1.6 Commenting on existing PRoW and cycling routes, a small number of PILs express concern that the updated road improvement proposals would result in the loss or permanent diversions on PRoW 368, and an increase in the distance of PRoW 367 by a significant amount (1,300m) due to proposed diversions. They conclude that this would result in unacceptable impacts on users of the network and demonstrates that Gatwick has assembled its plans independent of Local Cycling and Walking Infrastructure Plans, Local Transport Plans and emerging land allocations.
- 2.1.7 In other critiques of the overall design, one PIL expresses concern about each of the following:
- access to their property;
 - that the updated road improvement proposals would not be compatible with the delivery of other planned works, such as Gatwick Green's draft strategic employment site allocation;
 - that the proposals lack understanding of the regional level transport policy changes underway in County and Borough Councils; and

- that the overall timescale of the works would see that the updated road improvement proposals would be completed only after the planned opening of the realigned Northern Runway, from 2029 onwards.

Environment

2.1.8 In considering the environmental impact of the updated road improvement proposals, all PILS express some concern. Issues they express particular concern about include:

- increased noise pollution from construction and vehicles use, as well as the impact this might have on their mental wellbeing;
- increased light pollution from light spill on the motorways and vehicle headlights;
- a reduction in air quality within the vicinity of their properties, from emissions of NOX, particulates and dust from construction;
- the visual impact of the proposals, due the increased number of highways structures and loss of vegetation alongside the M23 that provides visual screening;
- the potential flood risk from increased surface water runoff, which they feel cannot be solved by creating a new attenuation pond northeast of Junction 9; and
- existing flood risk due to a lack of capacity at the existing attenuation pond northwest of Junction 9.

Local communities

2.1.9 A small number of PILS express particular concern that the updated road improvement proposals and the associated land take would have adverse impacts on their properties and land. They consider that Gatwick has failed to provide adequate justification for their land which had previously been identified for temporary or compulsory acquisition and dispute the requirement for additional pieces of their land beyond the 2021 Northern Runway Project boundary. In addition to this, one PIL expresses concern that the improvement works have the potential to restrict access to their property, which they insist needs to be maintained, and would have impacts on the day-to-day operations of land used as workplace, while another PIL comments that Gatwick discounts landowners' future plans for their land that should not be prejudiced by any of the improvement schemes.

Assessments

2.1.10 A small number of PILs note that while Gatwick has undertaken a number of assessments in preparation for the updated road improvement proposals, they consider that they take inadequate account of adverse effects to their property and:

- plans for future development;
- agricultural access; and
- impact on livestock/horses.

Misleading/ inaccurate information

2.1.11 One PIL expresses concern about what they consider to be misleading and inaccurate information contained in the documents related to the updated road improvement proposals. In particular, they comment that documents understate significant adverse effects in terms of agricultural land use and recreation, that planned diversions for PRoW would only address

impacts on PRoW 367 and not impacts of PRoW 368, and that letters sent to PILs omit large parcels of land south of the M23 Spur road.

Lack of detail

2.1.12 A small number of PILS express concern about a perceived lack of detail, in relation to the following:

- the M23 Spur;
- South Terminal roundabout;
- planned land take beyond the 2021 Northern Runway Project boundary;
- actual schemes identified for bus/cycle/pedestrian improvements;
- timescales for the reinstatement of PRoW;
- how surface water is to be managed; and
- the Airport Surface Access Strategy and its plans for sustainable transport and active travel.

Concerns about the proposals – PILs not subject to the targeted consultation

Traffic and congestion

2.1.13 Some PILs express general concern that the updated road improvement proposals would result in an increase in traffic and congestion. They consider that the proposals would increase not only airport related traffic, but also HGV, freight and service vehicle traffic within the vicinity of the airport. Commenting on the potential for gridlock and constrained capacity of surrounding roads, they express specific concern about the potential for congestion on:

- B2036;
- at the junction of the A22/A264;
- at junction 6 on the M25;
- feeder roads to the M23 and M25; and
- West Park Road into Lingfield.

Design and layout

2.1.14 A small number of PILs question the necessity of the updated road improvement proposals as they feel that the road layout around Gatwick is fit for purpose.

2.1.15 Commenting on the design of the proposals themselves, a small number of PILs express concern about the South Terminal Roundabout. In relation to the flyover, one PIL expresses concern about both the visual and noise impact this will have on their property, while one other PIL expresses concern that the design of the South Terminal slip road lacks consideration of the impact of Gatwick Green on local roads such as the B2036.

2.1.16 Some PILs consider the new road infrastructure to be too focused on the airport, and state that the lack of provisions in the proposals for local road improvements would result in problems for those in the immediate locality. One PIL also expresses concern that the improvements for the M23 would be insufficient, as this is where the bulk of airport traffic comes from.

2.1.17 Some PILS go on to express concern about other aspects of the updated road improvement proposals, including that:

- they would encourage private care usage and traffic;
- they would result in the removal of National Cycle Route 21;

- they would create diversions which would inconvenience users of the Sussex Border Path;
- they would prevent access to their property; and
- the designed mitigation measures would result in the removal of natural noise barriers.

Environment

2.1.18 Some PILs express concern about the environmental impact of the updated road improvement proposals. While one PIL expresses general concern and a small number of other PILs make comments about unspecified forms of pollution, the majority of PILs express concern about specific issues, which include:

- increased carbon emissions from construction;
- increased noise pollution from construction, road traffic and loss of vegetation;
- increased light pollution from light spill on the motorways and vehicle headlights;
- a reduction in air quality within the vicinity of their properties, from emissions of NOX, particulates and dust from construction;
- the visual impact of the proposals, due the increased number of highways structures, the loss of trees, hedges and other vegetation that provides visual screening and privacy;
- the impacts on biodiversity, carbon absorption and carbon sequestration of cutting down mature trees;
- the loss of animal habitat and impact on local wildlife, including for specific species such as buzzards;
- the loss of green areas and recreational spaces, such as Riverside Garden Park;
- the potential flood risk from increased surface water runoff, which they feel cannot be solved by creating a new attenuation pond northeast of Junction 9; and
- existing flood risk due to a lack of capacity at the existing attenuation pond northwest of Junction 9.

Local Communities

2.1.19 Some PILs express concern about the impact the updated road improvement proposals would have on those in the local community. They consider that the proposals would not only adversely impact their own properties and land but would also likely affect their property's potential future resale value.

2.1.20 The majority of these PILs also express general concern about the level of disruption that would be experienced as a result of the proposals, highlighting potential problems in accessing their property, the impact on properties operating as workplaces, and lack of privacy/security during the construction phase. One PIL goes on to express concern about their own physical and mental wellbeing, by commenting that the proposals would prevent them from enjoying their property, cause them stress, and impact their sleeping patterns.

Assessments

2.1.21 A small number of PILs comment that while Gatwick has undertaken a number of assessments in preparation for the updated road improvement proposals, they consider that they take inadequate account of adverse effects to their property and:

- agricultural access;

- impact on livestock/horses;
- noise pollution;
- air quality;
- landscape impacts and
- the use of public transport.

Misleading/ inaccurate information

- 2.1.22 One PIL expresses general concern that the impact on Riverside Garden Park has not been accurately reflected within the proposals.

Lack of detail

- 2.1.23 Some PILS express concern about a perceived lack of detail, in relation to the following:
- the M23 Spur;
 - South Terminal roundabout;
 - the overall timeline for the improvement works;
 - planned land take beyond the 2021 Northern Runway Project boundary;
 - the Airport Surface Access Strategy and its plans for sustainable transport and active travel;
 - disturbance to traffic on the B2036 during construction;
 - how surface water is to be managed; and
 - how the transport infrastructure investment will be a net benefit to local communities.

Suggestions about the proposals - PILs subject to the targeted consultation

Design and layout

- 2.1.24 In relation to the design of the updated road improvement proposals, a small number of PILS offer suggestions related to the M23 Spur. These PILs suggest adding temporary escape roads to the M23 to transfer some traffic onto the A23 or Balcombe Road and ensuring that existing agricultural land access is maintained along Balcombe Road.
- 2.1.25 A small number of PILs also each suggest one alternative design consideration, which are as follows:
- that Gatwick should pursue wider road improvements, to reduce congestion and increase the capacity on local roads; and
 - considering an alternative design for planned PRow diversions along the northern edge of the M23 Spur and Sussex Border Path.

Environment

- 2.1.26 A small number of PILs suggest mitigating against the environmental impacts of the updated road improvement proposals in specific locations, including:
- providing greater landscape and equality mitigation at Longbridge Roundabout, London Road, Riverside Garden Park and at Church Meadow by planting trees,
 - providing greater noise mitigation along the M23 Spur boundary adjacent to Dovenby Hall, at dwellings closest to the A23, and at Longbridge Roundabout by adding noise barriers; and
 - providing greater air quality mitigation at Dovenby Hall office.

Assessments

- 2.1.27 One PIL feels that further assessments should be completed in relation to the impact on their property, surface water attenuation, capacity of watercourses, and air quality along the M23 Spur. They request that the results of these assessments are shared with them and consulted on where necessary.
- 2.1.28 One other PIL suggests that Gatwick should prove that all land-take is justified in accordance with the rules and tests applying to compulsory acquisition, as set out in the Planning Act 2008. These tests include:
- that there is a compelling case in the public interest for the land to be acquired compulsorily;
 - that all reasonable alternative to compulsory acquisition have been explored and that interference with private rights is necessary and appropriate;
 - that no more land than is reasonably necessary is taken;
 - that compensation reflects any ‘appropriate alternative development’; and
 - that the owners of such land must be left in a position of equivalence to that before the acquisition took place.

Further information

- 2.1.29 A small number of PILs make requests for further information, in relation to the following:
- Worth Park Nurseries, which has been marked as an Area of Interest;
 - all temporary and permanent land required for the Project, including that required for construction workspace/compounds
 - a detail access plan; and
 - the design of the widened bridge structure over Balcombe Road.

Suggestions about the proposals - PILs not subject to the targeted consultation

Design and layout

- 2.1.30 In relation to the design of the M23 Spur, one PIL suggests ensuring that existing agricultural land access is maintained along Balcombe Road.
- 2.1.31 Some PILs suggest alternative design considerations, including:
- considering an alternative design for of planned PRow diversions along the northern edge of the M23 Spur and Sussex Border Path,
 - describing the M23 Spur as having a ‘significant’ impact on PRow 367Sy in Tables 3.1.2, 3.1.12, and 2.1;
 - engaging with PILs on diversion routes for PRow 367Sy; and
 - providing access to the airport via Buckingham Gate for buses, cyclists and pedestrians.

Environment

- 2.1.32 A small number of PILs suggest mitigating against the noise and air quality impacts of the updated road improvement proposals, by providing a grant scheme for double/triple glazing for local residents, by adding noise barriers along the M23 Spur, and by assessing air quality impacts along the M23 Spur to identify potential mitigation.

Assessments

- 2.1.33 One PILs suggest that further assessments should be undertaken to understand the impact of the updated road improvement proposals on their properties, air quality, surface water attenuation, capacity of watercourses, cumulative scheme at Horley Business Park, Gatwick Green, Local Plans and other commitments surrounding the Project boundary. They request that the results of these assessments are shared with them and consulted on where necessary.

Further information

- 2.1.34 Some PILs make requests further information, in relation to the following:
- all temporary and permanent land required for the Project, including that required for construction workspace/compounds;
 - the defined Project boundary;
 - a detailed access plan;
 - mode switch plans;
 - diversion routes for the M23; and
 - the location of the planned highways runoff flood storage facility.

2.2 Car parking

Support for the proposals - PILs subject to the targeted consultation

General

- 2.2.1 One PIL expresses support for the proposals related to car parking, on the grounds that a lower number of additional car parking spaces would be provided. This PIL supports the use of robotic parking, and comments that multi-storey and decked car parks would reduce land take and be more resource effective.

Support for the proposals - PILs not subject to the targeted consultation

Landscape and ecology

- 2.2.2 One PIL voices support for the replacement of Car Park B with open space that links to Riverside Garden Park, on the grounds that this would be beneficial to the local landscape by reducing the level of concrete in the area.

Concerns about the proposals - PILs subject to the targeted consultation

General

- 2.2.3 One PIL voices general concerns about the car parking proposals, as they believe that these do not adequately define 'sustainable travel' and make unjustified assumptions regarding travel patterns and modal split.

Car use

- 2.2.4 The following concerns are raised by one PIL each:
- that they view the proposals as ineffective against unauthorised parking, as they would rely on local authorities to enforce parking restrictions, which this PIL says cannot be guaranteed;
 - that they feel an encouragement of electric vehicle use would still increase demand for car parking spaces and exacerbate congestion; and

- that replacing car parks with new hotels and offices might not be feasible, as they believe this would not provide sufficient space and could lead to greater land take to meet the growing demand for car parking.

Landscape and visual impacts

- 2.2.5 One PIL raises concerns that the use of additional land for new car parks appears to displace existing green spaces, without providing further detail.

Inaccuracies

- 2.2.6 One PIL believes that the car parking proposals contain misleading or potentially inaccurate information. They say that Gatwick appears to have incorrectly classified electric vehicles as sustainable transport, with the apparent intention to make it easier to reach the airport's sustainable transport targets, but that in reality electric vehicles should instead be classified as a subset of cars.

Concerns about the proposals - PILs not subject to the targeted consultation

Overall opposition

- 2.2.7 One PIL expresses overall opposition to the latest proposals on car parking, without providing further detail.

Car use

- 2.2.8 Some PILs believe that the reduction in additional parking spaces would mean that growing passenger demand would instead be met through unauthorised and illegal car and taxi parking, including on greenbelt land and in residential areas, with one PIL expressing specific concern that the proposals could lead to unauthorised street parking in Horley's The Crescent. These PILs note that valet parking operators already use open fields without planning permission and feel that this growth in unauthorised parking would be difficult to control.
- 2.2.9 A small number of PILs express concerns about the costs and charges associated with car parking, as they believe that the forecourt fees are very high for passengers and that the increasing cost of car parking at the airport has encouraged valet parking. A similar number also voiced concern about the motivations behind the proposals, as they believe that reducing the number of additional parking spaces would encourage more drop-offs and in turn increase Gatwick's forecourt profit.

Need for upgrades

- 2.2.10 A small number of PILs believe that the airport should not expand, and therefore increased car parking would not be necessary.

Community impacts

- 2.2.11 Some PILs believe that an increase in car parking spaces would cause disruption for local residents and airport staff, without providing further detail. One PIL feels that linking Riverside Garden Park and The Crescent would lead this latter residential area to become a rat-run and public thoroughfare, and another says that, in their experience, part of Car Park B has not been properly maintained, encroaches on properties, and leads to anti-social behaviour due to a lack of adequate fencing.

2.2.12 One PIL cites previous instances of taxi littering and defecation to support their belief that the plans would be negative for the local community and says that these proposals need to consider the views of local residents.

Environment

2.2.13 A small number of PILs feel that additional car parking spaces would increase air pollution from vehicles, with specific concerns that residents who lived in the area since before the airport was built would see a decline in air quality.

2.2.14 A similar number worry that the car parking proposals would increase noise pollution for local residents both day and night, many of whom moved to the area before the airport was built.

2.2.15 A small number of PILs feel that the car parking proposals would undermine the aesthetics of the area through a loss of open space and greenbelt land.

2.2.16 Finally, the following concerns are raised by one PIL each:

- that the removal of on-airport car parking would encourage unauthorised parking on greenbelt land, threatening local wildlife;
- that an increase in car parking spaces appears to be contrary to the Project's aim of carbon neutrality;
- that proposals would increase pollution, although this PIL does not specify the type of pollution; and
- that the car parking proposals appear to have adverse impacts on the local environment, without providing further detail.

Other comments

2.2.17 Finally, the following concerns are raised by one PIL each:

- that reducing the number of proposed parking spaces might undermine the airport's ability to meet the projected growth in passengers;
- that there appears to be insufficient car parking spaces with electric vehicle charging points; and
- that additional car parking spaces could increase traffic and congestion around the airport.

Suggestions about the proposals - PILs subject to the targeted consultation

Parking enforcement/management

2.2.18 One PIL suggests that Gatwick continue monitoring unauthorised parking to ensure that replacement on-airport spaces are provided to meet, but not exceed, demand.

Further information

2.2.19 A small number of PILs make requests for additional information about the proposals. They suggest that future consultation documents provide further detail on how a modal shift towards public transport would be achieved, and query how electric vehicles were considered in the context of the number of spaces proposed, and what the expected impacts of these vehicles would be.

Suggestions about the proposals - PILs not subject to the targeted consultation**Design**

2.2.20 Some PILs suggest that:

- multi-storey car parks are located in close proximity to each other, to minimise land take and potential visual impacts from the infrastructure;
- public access between Car Park B and The Crescent in Horley is restricted;
- taxi facilities are provided, including a designated waiting area, to prevent disruption to local communities;
- the forecourt fee should be removed;
- faster access from Balcombe Road is provided for off-airport shuttle buses, as this would reduce traffic and encourage more passengers to park off-site; and
- the North Terminal drop-off/waiting area should be improved, with access separate from the Short Stay Car Park to avoid confusion and long queues, perhaps by re-locating the area further from the airport with access via shuttle bus.

Car use

2.2.21 One PIL suggests that parking spaces be confined within the airport boundary, on the grounds that there would be sufficient space to meet demand within the limits of the airport, and that this would avoid potential adverse impacts on the local area.

2.3 Project updates**Support for the proposals - PILs subject to the targeted consultation**

2.3.1 One PIL expresses support for the investment in Gatwick Station.

Support for the proposals - PILs not subject to the targeted consultation

2.3.2 One PIL supports the Project updates provided further mitigation measures are improved to remedy existing concerns.

Concerns about the proposals - PILs subject to the targeted consultation**Assessments**

2.3.3 One PIL expresses concern about the assessments Gatwick have conducted and that they have not considered impacts on other landowners as a result of the Northern Runway Proposals. They also feel the Airport Surface Access Strategy lacks sufficient detail about new services or infrastructure.

Public Transport

2.3.4 One PIL expresses concern that the public transport proposals are based on questionable assumptions about how many passengers and employees would choose to travel via sustainable means without providing further detail. They also feel there will be limited opportunity to further develop Gatwick station.

Hotels and offices

2.3.5 One PIL feels Gatwick has not justified classifying hotels and offices as associated developments under the planning application.

Local community

- 2.3.6 One PIL feels there has been an absence of engagement with landowners and that Gatwick have not demonstrated that alternatives to compulsory acquisition have been explored.

Concerns about the proposals - PILs not subject to the targeted consultation

- 2.3.7 Comments expressing concern about the proposals from Persons with Interest in Land (PILs) not subject to this targeted consultation on the highways improvements – S42(d)

Public Transport

- 2.3.8 A small number of PILs express concern about the public transport proposals, including that they would add an additional burden to the road network and strong commitments are not given on how Gatwick would move to more sustainable transport systems.
- 2.3.9 A similar number of PILs express particular concern about the lack of suitable rail infrastructure to move passengers to the airport. A small number of PILs feel the plans for active travel would not be used for workers or staff due to the distances involved and timing of shift patterns.

Environment

- 2.3.10 A small number of PILs express a general concern about the environmental impacts as a result of the proposals, and in particular the removal of established trees and planting.
- 2.3.11 A small number of PILs express concern about the water management proposals as they feel that reducing flood protection measures would increase the risk of significant flooding in the local area. They suggest that adding wastewater to the River Mole would increase the chance of homes flooding and impact the biodiversity of the river. They feel Gatwick should provide a full record of flood discharge events over the past 10 years.

Carbon

- 2.3.12 Some PILs express concern about the carbon impacts of the proposals. They comment that expanding airport operations would lead to an increase in carbon emissions at a time when there are supposed to be national efforts to reduce carbon output. In particular respondents question how the Carbon Action Plan would manage this if air space in the southeast region becomes congested and as a result more flights enter holding patterns. A small number of PILs explicitly comment that the expansion of Gatwick would directly contradict efforts to reach net zero.
- 2.3.13 One PIL comments that construction activities would also increase carbon emissions and make the Project undesirable.
- 2.3.14 A small number of PILs express concern that the proposals rely on future low-emission technology which is not guaranteed to be effective.

Local community

- 2.3.15 Some PILs comment that the Project updates would have a detrimental impact on the local community without providing further detail. They feel the proposals do not offer suitable benefits to those living in close proximity to the airport but rather that local residents could suffer negative impacts from the expansion and removal and replacement of existing green space. A small number of PILs feel this will negatively impact the health and wellbeing of local residents.
- 2.3.16 A small number of PILs express concern that their property would lose value as a result and

question how Gatwick would compensate them.

- 2.3.17 A small number of PILs feel there are not sufficient measures to provide adequate infrastructure such as housing and public services as part of the proposals.
- 2.3.18 A small number of PILs question whether the area would experience economic benefits as they feel the area has high existing employment and that Gatwick already struggles to fill active vacancies. They also question if the local community is too reliant on Gatwick and if the jobs may be insecure.

Airfield

- 2.3.19 One PIL expresses concern about the CARE facility and what materials would be used in fuelling the boiler.

Suggestions about the proposals - PILs subject to the targeted consultation

- 2.3.20 One PIL makes several suggestions, including that Gatwick should promote various alternative transport options to travel to the airport and that the justification for additional hotels and offices needs to be made more explicit.

Suggestions about the proposals - PILs not subject to the targeted consultation

Request for further information

- 2.3.21 A small number of PILs request further information from Gatwick about what would fuel the biomass boiler and what impact this would have on the environment.

Local communities

- 2.3.22 A small number of PILs make suggestions about what Gatwick should do to ensure the local community are compensated for the impacts of the proposals. This includes investing in local services, providing job opportunities exclusively to local residents, and direct financial compensation for those directly affected.

Public transport

- 2.3.23 A small number of PILs make suggestions about public transport. These include:
- investing further in transport infrastructure, including in local roads; and
 - providing a pick-up and drop-off section for people at the rail station.

Airfield

- 2.3.24 A small number of PILs make other suggestions about the airport generally including that money should be invested in renovating the terminal and facilities there instead of on the Project.

2.4 General comments

Concerns about the proposals - PILs subject to the targeted consultation

General opposition to the Project

- 2.4.1 A small number of PILs express general opposition to the Project, without providing further details.

Concerns about the proposals - PILs not subject to the targeted consultation**General opposition to the Project**

- 2.4.2 Some PILs express general opposition to the Project, and call for it to be abandoned, without providing further details.

Assessments and information

- 2.4.3 A small number of PILs express concerns about the environmental assessments linked to the proposals to expand the airport. They comment on the lack of an evidence-based environmental assessment, and express concern that the calculation of the financial cost of emissions resulting from the expansion is incorrect and does not follow government guidance.

Noise

- 2.4.4 Some PILs express concerns that an increase in the number of flights and airport ground operations will increase noise levels, impacting quality of life in the local communities. They highlight a historical lack of compensation and mitigation regarding noise pollution associated with the airport's operation, and state that the original proposals to develop a noise envelope are not described in sufficient detail.

Noise mitigation

- 2.4.5 A small number of PILs raise concerns about the proposed noise mitigation measures included in the original Northern Runway Project proposals. They highlight that the Project does not consider a cap on number of flights, including during night-time, and state that Gatwick should not rely on the development of quieter aircraft to mitigate noise, as the implementation of these technologies might take too long or not be effective.
- 2.4.6 One PIL raised concerns about Gatwick's design process for the proposed noise envelope. They comment that the process is not compliant with government policy or Civil Aviation Authority (CAA) guidelines and that the process should be comprehensive and examine all options from a first principles basis.

Impact on the environment

- 2.4.7 A small number of PILs express general concern about the impact of the airport expansion on the environment. They comment that the impact of the proposals on the environment cannot be mitigated and have not been sufficiently addressed. They also express concerns about Gatwick's sustainability plans and how they will be met.
- 2.4.8 Some PILs express general concern that the Project would increase pollution, without providing further details.

Air quality

- 2.4.9 Some PILs express concerns about air pollution and the potential negative impact of the proposals on air quality in the local area to the airport. They comment that the quality of air in the local area is poor, and that increased air traffic linked to the airport expansion would worsen air pollution. They also highlight that the impacts of air pollution can already be seen and felt in gardens, houses and by local residents, and express concerns that despite discussions about cleaner aviation fuels, there are no perceptible improvements in air quality.

Flight paths and timing

- 2.4.10 One PIL expresses concern that current GPS-guided flight paths cause flights to follow the exact path every time, instead of allowing some flexibility for planes to approach the airport from either side of the flight path beacon. They comment that this leads to systematic disruption for specific residents and areas.
- 2.4.11 Another PIL comments that the expansion of Gatwick will increase disruption to local residents during the night and impact the quality of their sleep, due to the increased noise from manoeuvring aircraft.

Necessity

- 2.4.12 One PIL raises a concern that the airport expansion is not needed as Gatwick is considered to have reached its optimum performance in 2019, balancing out impacts and benefits.
- 2.4.13 A small number of PILs comment that the expansion of Gatwick is not justified, as the Airport Commission decided against it in 2015, and in favour of increasing capacity at Heathrow Airport.
- 2.4.14 One PIL expresses concern that the plans to expand the airport are not appropriate at a time of reduced demand for flights and great financial impact on the airport, as a result of the COVID-19 pandemic.

Safety

- 2.4.15 One PIL expresses concern that the expansion of the airport will increase the risk of accidents and loss of life. They raise that the airport will not be able to manage the proposed increase in air traffic safely. Another PIL expresses concern that the use of the emergency runway at Gatwick for routine operations could be dangerous.

Impact on the existing infrastructure

- 2.4.16 A small number of PILs express concerns about the impact of the Project proposals on the airport's existing infrastructure. They comment that the proposals do not offer sufficient safeguards to protect the existing infrastructure and capacity of the airport, including the existing main runway. They also highlight that there still are operational and commercial concerns related to potential negative impacts on the existing airport infrastructure that are not sufficiently addressed on the proposals, without providing further details.

Passenger experience

- 2.4.17 Some PILs express concerns related to passengers' experiences of using Gatwick Airport. They comment that the existing waiting facilities at the airport are inadequate, and that the airport experience should be easier and friendlier for customers. Respondents believe that any changes to airport operation should focus on the benefit to customers and express concerns about how the quality of service might be impacted if a second runway comes into regular operation. They mention that increases in air traffic might result in delays to passengers, and express concern that the cost of the expansion might be passed on to travellers in the form of increased prices.

Other concerns

- 2.4.18 A small number of PILs express concerns that the Project is mainly motivated by profits, without providing further details.

Suggestions about the proposals - PILs not subject to the targeted consultation**Noise and other mitigations**

- 2.4.19 One PIL suggests that the GPS flight paths should be varied to reduce the disruption to overflowed residents. Another PIL suggests that residents should be compensated for any noise impacts they might experience as a result of the Project. They mention that residents should be offered subsidised glazing improvements grants to upgrade their property and mitigate the impact of additional noise.
- 2.4.20 Regarding airport operations and the timing of flights, one PIL suggests that pilots should be trained to not run aeroplane engines excessively while on the ground, and that they should be penalised for breaching these requirements. They also suggest that ground operations in the airport should be limited to sociable hours, and that flights should stop at 10:00 p.m. and not resume until the morning, to limit the impact of noise on local residents.

Assessment and information

- 2.4.21 One PIL suggests that Gatwick should perform a full and detailed environmental impact assessment as soon as possible, before the DCO application, and share it with relevant stakeholders.

Other suggestions

- 2.4.22 One PIL suggests that Gatwick should focus on helping airlines achieve their sustainability goals and improve airspace efficiency, while a small number of PILs suggest that, instead of bringing a second runway into routine operation, airport operations should be scaled back, and the number of flights reduced.

2.5 Consultation process**Support for the proposals - PILs subject to the targeted consultation**

- 2.5.1 One PIL expresses support for the level of additional detail provided by Gatwick on the extent of permanent and temporary land-take requirements; with another more generally describing the plans as 'helpful'.

Concerns about the proposals - PILs subject to the targeted consultation**Inaccurate or misleading information**

- 2.5.2 One PIL criticises the consultation materials and figures as being unclear on land-take, access proposals and other impacts on landowners.

Consultation process

- 2.5.3 A small number of PILs express the concern that Gatwick has not adequately or meaningfully engaged with them on the proposals. One of these PILs emphasises the lack of engagement on minimising the impact of the Northern Runway Project to adjacent non-highways land. The other PIL is concerned about a lack of engagement on potential temporary and permanent compulsory acquisition of their land, which they comment suggests that Gatwick has not properly considered alternatives. This PIL is also concerned at a lack of clear designs justifying the locations of proposed works.
- 2.5.4 One PIL comments that Gatwick has not addressed the issues raised in theirs or any other

response to the Autumn 2021 consultation, and therefore may not be complying with the requirements of the Planning Act 2008. This PIL also feels that Gatwick has not addressed the issues raised in the Topic Working Groups.

Consultation and Project timeline

- 2.5.5 One PIL is concerned that there appears to be limited remaining time for consultation prior to DCO submission in the spring of 2023, commenting that this may be insufficient given the number of issues which remain outstanding.

Concerns about the proposals - PILs not subject to the targeted consultation

Amount of information provided for the consultation

- 2.5.6 Some PILs express concern that Gatwick has not provided further information or addressed their concerns since the Autumn 2021 consultation, with one PIL going on to comment that the lack of information means they maintain their objection to the Project. One PIL comments that they are disappointed that the consultation documents do not mention the availability of labour.

Inaccurate or misleading information

- 2.5.7 A small number of PILs express the concern that the consultation materials are misleading in terms of noise levels, job creation and effects on local residents in general. One PIL criticises the consultation document for being too long and having unclear diagrams, such as the before and after vegetation diagrams.

Consultation process

- 2.5.8 A small number of PILs criticise the level of promotion of the consultation, with one specifically criticising the following:
- prioritisation of the views of National Highways over all other views expressed in the Autumn 2021 consultation;
 - lack of local consultation;
 - lack of consultation on Longbridge Roundabout with the affected parish council;
 - lack of clarity on the changes proposed to Riverside Garden Park and their impacts; and
 - lack of consultation with Sustrans regarding cycle route 21.
- 2.5.9 Some PILs comment that they feel Gatwick will not consider their consultation responses and will continue with its plans regardless of their comments. One PIL expresses concern with the noise envelope group, commenting that it is not independent as it is led by Gatwick employees and supporters.

Suggestions about the proposals - PILs subject to the targeted consultation

Further engagement

- 2.5.10 A small number of PILs request further engagement from Gatwick regarding its proposals and the effects on their land interests in order to resolve outstanding issues, as well as more engagement with landowners in general. One PIL comments that more detailed designs are required to better justify proposals and permit proper feedback.

Suggestions about the proposals - PILs not subject to the targeted consultation**Further engagement**

- 2.5.11 Some PILs comment that they would welcome further engagement with Gatwick regarding the issues raised in their responses, in particular the minimisation of impacts of the Project on adjacent non-highways land.

Requests for further information

- 2.5.12 One PIL requests that local communities be given more explanation regarding the noise impacts to them of the proposals, whilst another queries how much information was made public prior to the Autumn 2021 consultation.