

**Gatwick Airport DCO Application**

**National Infrastructure Planning**

**Temple Quay House**

**2 The Square**

**Bristol, BS1 6PN**

By email to: [GatwickAirport@planninginspectorate.gov.uk](mailto:GatwickAirport@planninginspectorate.gov.uk)

Date: 20 July 2023

Dear Sir/Madam,

**RE: TR020005 Gatwick Northern Runway Development Consent Order Application Adequacy of Consultation Request Reigate and Banstead Borough Council Part Response**

Thank you for your email dated 7th July 2023 providing Reigate & Banstead Borough Council (RBBC) the opportunity to consider the Adequacy of Consultation undertaken by Gatwick Airport Limited (GAL) on the Gatwick Airport Northern Runway Development Consent Order application.

Most of our concerns have been addressed in the Gatwick Authorities Joint Response which we have contributed to and fully endorse. The Joint Response is being sent to yourselves by Crawley Borough Council on the host authorities' behalf.

However, one issue that particularly concerns us is whether GAL sent out notification letters, addressed to occupiers of nearby properties, particularly in the south Horley area, who will be particularly affected by the proposals. We are aware of the newsletter but not household and business specific letters which are more likely to be read prior to disposal. We feel this is particularly pertinent under s42 – Duty to consult and s44 (4) Categories for purpose s42 1(d) - of the Planning Act 2008 (The Act).

In addition, RBBC wishes to draw the Inspectors' attention to specific issues with the Consultation Report (CR) under s49 - Duty to take account of responses to consultation and publicity and s50 - Guidance about pre-application procedure of the Act. These include the way some of the RBBC representations appear to have been over simplified and over-looked (s49) and where the CR response refers to updated ES chapters and related documents which are yet to be shared by the applicant (s50).

For the purposes of this exercise, we have used as the starting point the Gatwick Consultation Report Chapter 6.1 Annexes B and D as they apply to the 2021 and 2022 consultations respectively, which were undertaken by GAL. These have then been cross referenced to the RBBC responses and then how they were considered in

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the main report contained in Chapter 6.1 Annexes A and C. The last column highlights the remaining RBBC issues which we wish to raise with the Inspectors on the CR specifically.

### PIER consultation 2021

RBBC Ref	GAL Book 6.1 CR Report Annex B	RBBC Original Representation Reference	GAL Book 6 Chapter 6.1 Annex A response	RBBC Issue with CR
21/1	1.51.10 A detailed lighting assessment was requested in the RBBC consultation response	Para 8.4 The purpose of the request was to address light impacts on nature and nearby properties.	Page 20 refers to artificial light and parking and Page 26 Refers to Bats & a lighting strategy	Whilst GAL have said they would prepare a Lighting Strategy the details have not been presented to the Topic Working Groups.
21/2	1.51.11 Summarises improvements to active travel including mini-Holland roundabouts at South and North Terminal junctions	Para 12.11	Page 138 Cycle routes	It is not clear how or if the request for mini-Holland roundabouts has been considered in the CR.
21/3	1.51.15 Summarises access to the proposed Horley Business Park Site	Paras 8.9-8.11	Page 151 Construction Compounds GAL considers that; 'Access to Horley Business Park is not included within the highway design proposals as it is not a committed scheme at this stage'.	The impact of the South Terminal works compound on stymieing the Horley Business Park site has not been addressed in the CR i.e the harm the compound would do to progressing the business park.
21/4	1:51.16 2 <sup>nd</sup> sentence, summarises concerns on the potential for proposed rail network capacity improvements on the Brighton London Main Line being absorbed by Gatwick's passenger growth	Paras 12.13-12.14	Page 76 Railway modelling and assessment	We understand that the Croydon Area Remodelling Scheme has now been put on hold indefinitely. The revised ES Chapter 12 Transport and supporting evidence has not been shared with the Transport

				Topic Working Group.
21/5	1.51.17 Rehoming residents adversely affected by construction works	Para 4 Noise and Vibration	Page 91-92 Construction impacts on residents at Horley Gardens Estate	Whilst very limited information has been shared on the Code of Construction Practice, the final document has not been shared with the Topic Working Groups.
21/6	1.51.18 Request to consider use of 'whisper' tarmac and introduce a road speed reduction to 40mph on M23 spur between M23 spur and A23	Para 14.43 v)	Page 89 Road Noise – includes list of measures to reduce road noise	ES Appendix 14.9.4 Road Traffic Noise Modelling final document has not been shared.
21/7	1.51.19 Noise benefits associated with new technologies and quieter aircraft are being absorbed by Gatwick rather than shared with its neighbouring communities.	Para 14.37	Page 142 addresses elements of noise impacts and mitigation	The CR does not specifically address sharing noise improvement benefits with neighbouring communities.

### Summer 2022 Consultation

RBBC Ref	GAL Book 6.1 CR Report Annex D	RBBC Original Representation Reference	GAL Book 6 Chapter 6.1 Annex C response	RBBC Issue with CR
22/1	1.28.5 Council seeks confirmation that the effects of wind turbulence have been taken into account as a result of the noise barriers.	Page 3 3 <sup>rd</sup> paragraph	Page 82 Topic Traffic Noise	The final Appendix 14.9.4 of the ES has not been shared with the noise topic working group
22/2	1.28.10 Council has investment in Riverside Gardens and would require financial compensation	Page 5 2 <sup>nd</sup> paragraph.	Page 17 highlights Gatwick Airport Community Trust & Gatwick Foundation Fund	Financial compensation for land and amenity loss has not been specifically addressed in

				the CR
22/3	1.28.17 Council sought to review Construction Travel Plan ahead of DCO	Page 7 Construction Travel Plan	Page 126 Construction travel plan advises was discussed at transport topic working group in June 2022	The detailed Construction Travel Plan document has not been shared with the Transport Topic Working Group

We hope that the examining Inspectors find these comments helpful in their considerations on the Adequacy of the Consultation undertaken by Gatwick Airport Limited. We are disappointed by the lack of information sharing highlighted above and in addition to the concerns raised in the Joint Response issued by the Gatwick local authorities. Should you wish to discuss this response specifically, please contact Ian Dunsford at: [ian.dunsford@reigate-banstead.gov.uk](mailto:ian.dunsford@reigate-banstead.gov.uk)

Yours sincerely,



**Andrew Benson**  
Head of Planning Services