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20 July 2023

BY EMAIL ONLY

Dear Mr Harrold,

RE: Application by Gatwick Airport Ltd for an Order Granting Development Consent for the Gatwick Airport Northern Runway Project

Horsham District Council's Adequacy of Consultation Representation

1.0 INTRODUCTION

1.1 Thank you for the opportunity to provide our comments on the adequacy of consultation undertaken by Gatwick Airport Ltd ('the Applicant') in relation to its application for development consent for the Northern Runway Project ('the Project'). As you know Horsham District Council is a statutory consultee and one of the local authorities identified by Section 43(2) of the Planning Act 2008 ('the Act'). We are defined as a Neighbouring Authority as there is no development within Horsham District although, for context, the airport directly adjoins the northern boundary of our District.

1.2 Under Section 55 of the Act, certain local authorities must be consulted about whether an applicant has complied with their duties under Sections 42, 47 and 48 and as set out in the Applicant's Consultation Report;

- Section 42: Duty to consult
- Section 47: Duty to consult local community
- Section 48: Duty to publicise

1.3 Please note that a Joint Adequacy of Consultation Representation ('the Joint Representation') has been prepared by the Gatwick Local Authorities (the 'Authorities'), of which we are one:

- **Host authorities:** Crawley Borough Council; West Sussex County Council; Mole Valley District Council; Reigate and Banstead Borough Council; and Surrey County Council.
- **Neighbouring authorities:** Horsham District Council; Mid Sussex District Council; Tandridge District Council; East Sussex County Council; and Kent County Council.

- 1.4 **The Council supports and endorses in full all the comments raised by the Authorities in the Joint Representation, which should be read in conjunction with this authority-specific Representation.**
- 1.5 Accordingly, the Joint Representation provides a detailed assessment of the Authorities' view of whether the applicant has complied with Sections 42, 47 and 48 of the Act. The Authorities have also provided an assessment of whether the applicant has complied with Section 49 of the Act (duty to take account of responses to consultation and publicity) and Section 50 of the Act (guidance about pre-application procedure). Within this context, the Authorities have highlighted the Gunning (or Sedley) Principles which set a framework for conducting public consultation by indicating four principles that have to be met for a legitimate consultation and have suggested where the Authorities consider these principles have not been met.
- 1.6 Given this detailed assessment, the Council has dispensed with providing further detailed commentary that would unnecessarily duplicate the contents of the Joint Representation. Rather, we have chosen to provide some more specific local experiences of the Applicant's pre-application engagement with Horsham District Council as a local authority.
- 1.7 We have ordered this Representation chronologically. First, we have considered "Section 47: Duty to Consult" (see Section 2.0) which is the Applicant's engagement with the Council and approach to consultation as set out in its Statement of Community Consultation (SoCC). The SoCC sets the framework for the Applicant's consultation which we then turn to under "Section 42: Duty to consult local community" in Section 3.0. Finally, we touch briefly on "Section 48: Duty to publicise" in Section 4.0 with our overall conclusions set out in Section 5.0.

2.0 SECTION 47: DUTY TO CONSULT STATEMENT OF COMMUNITY CONSULTATION ENGAGEMENT

- 2.1 Paragraph 34 of the DCLG Planning Act 2008: Guidance on the pre-application process¹ states that *"Local authorities have considerable expertise on consulting local people. They will be able to draw on this expertise to provide advice to applicants on the makeup of the community and how consultation might best be undertaken"*.
- 2.2 Paragraph 5.2 of the Inspectorate's Advice Note Two² states that in responding to a consultation on the proposed Statement of Community Consultation (SoCC) it provides *"a key opportunity for a local authorities to advise the applicant, using its local knowledge, as to how the community consultation should be conducted. The PA 2008 states that a developer must give a local authority 28 days (Planning Act 2008 section 47(3)) to comment on the draft SoCC, starting on the day after the local authority receives it. Some local authorities work collaboratively with a developer to prepare the SoCC in an iterative way and this is encouraged. A developer must have regard to any comments a local authority provides at this stage but is not required to act on them; however, any*

¹ [Planning Act 2008: Guidance on the pre-application process](#), DCLG (2015)

² [Advice Note Two: The Role of Local Authorities in the Development Consent Process](#), National Infrastructure Planning, Planning Inspectorate (2015)

disagreement about the effectiveness of the methodology used can be reflected in any adequacy of consultation representation that a relevant local authority will be invited to make... and may have a bearing on the acceptance decision”.

- 2.3 The Council was formally consulted by the applicant on three separate occasions in relation to the draft SoCC. This is set out in more detail in the following paragraphs. There were also opportunities to provide informal comments in November 2019, in March 2021 and in May 2022.
- 2.4 In response to the first formal request to comment on the SoCC in February 2020, the Council submitted a response in March 2020. This response was in two parts: (Part One) a jointly prepared Authorities’ response and (Part Two) the Council’s authority-specific comments.
- 2.5 Shortly after issuing this advice, the Covid-19 Pandemic stalled the Project, although following formal notification of the Project’s recommencement on 21 December 2020, the Council was consulted informally on the revised SoCC in March 2021 and then formally consulted in May 2021, in anticipation of the autumn 2021 statutory consultation.
- 2.6 Whilst acknowledging the devastating impacts of the Covid-19 Pandemic, the Council still considered that much of the advice we had submitted to the Applicant in March 2020, prior to the pause of the Project, was still relevant and we appended this response along with further feedback, taking into account the impacts of the Pandemic.
- 2.7 The Joint Representation summarises in detail the shared overarching feedback that the Authorities provided in response to each opportunity to comment on the various SoCC drafts and other aspects of engagement in 2020, 2021 and 2022. To avoid unnecessary duplication, the commentary below focuses solely on the Council’s authority-specific feedback in relation to Horsham District.

Consultation areas and the location of events

- 2.8 In the Council’s formal feedback to the Applicant in March 2020, we advised the Applicant to hold events in Horsham, the District’s main town (approximately 8km from the Airport); in Billingshurst, which is a large village that sits centrally in the District; plus holding events in Ruser, Colgate and Warnham, which are all villages significantly affected by overflight in the north and north east of the District. Whilst we welcomed events being held in Horsham and Billingshurst we expressed disappointment with the overall number of events in Horsham District.
- 2.9 In our informal response to specific questions about the location of events in Horsham District, the Council advised that it would be imperative for events to be held in a variety of different venues to ensure that as many different parts of the community were reached. For example, we strongly recommended holding an event in the Swan Walk shopping centre in Horsham, plus a further Horsham-based event, for example in Park Barn (centrally located close to the main town park and the District Council offices) or the Holbrook Centre (a community centre in a residential location in the north of the town).

For the villages, the village halls were advised to be the most appropriate locations and in Billingshurst, the Billingshurst Centre was suggested as an appropriate venue.

- 2.10 As part of its engagement strategy the Applicant based its Outer Consultation Zone on the Gatwick Diamond area and the Inner Consultation Zone around the 51dB(A) Leq noise contour for 2038. The Gatwick Diamond area is a business-led economic partnership in which the Airport sits centrally. The geographical area is defined as an economic region but it should not necessarily be used to define who should be consulted about this Project, as the parameters for engagement differ.
- 2.11 The Council raised concern with this approach as Gatwick Diamond does not cover the area where flights paths extend much further over West Sussex and in particular, Horsham District. The Applicant indicated that the Inner Consultation Zone was developed to focus engagement activities, such as more exhibitions (indicated prior to the Pandemic), and residents within this area would receive the Project Newsletter, unlike residents located in the Outer Consultation Zone.
- 2.12 The Council highlighted that this would not be sufficient for areas in Horsham District such as Slinfold village, (15km southwest of Gatwick) which is increasingly experiencing overflight. It was therefore requested that the consultation area should be extended further west because some of the areas outside of the Inner Consultation Zone are potentially more affected by overflight than those within it and by not doing so, it was considered these residents would be at risk of lacking awareness of the proposals and might not have been able to participate fully in the Consultation.
- 2.13 The revised SoCC issued in May 2021 updated the noise contours from 2038 to 2029 which we welcomed, however, there were still concerns that the areas further west over Horsham District were not being given sufficient opportunities to be fully informed of and given the maximum opportunity to respond to the Consultation. Subsequently, the published SoCC was based on the noise contours for 2032, although this still did not address our concerns regarding some areas in the District falling outside of the Inner Consultation Zone.
- 2.14 The Council also expressed that the selection of the 51dB(A) Leq 2038 noise contour did not take account of any changes that may take place as a result of the FASI South Airspace Modernisation Programme and we recommended that the Inner and Outer Consultation Zones should be expanded to ensure that all residents who could be affected by all future airport growth scenarios could participate in the Consultation. This is because there is a significant interrelationship between the various proposals and the Council does not consider that the impacts are mutually exclusive.
- 2.15 These issues were not addressed in the revised SoCC issued in 2021 and the Council reiterated its concerns, highlighting that a fair and equitable consultation can only be achieved by extending this area to include areas of overflight, rather than focusing solely on the Gatwick Diamond area.

- 2.16 Additionally, the Council expressed concern in its formal response³ to the autumn 2021 consultation that the formation of the Inner Consultation Zone did not correspond with the Noise Preferential Route (Route 9 also known as the WIZAD route)⁴. The WIZAD SID⁵ is a tactical offload route that is currently rarely used by Air Traffic Control and at the time of consultation in 2021 it was not clear how the runway movement rate could be achieved with potential inferred implications for the WIZAD route.
- 2.17 In the documentation that has since been shared by the Applicant with the Authorities, the Applicant suggests that the WIZAD SID will be used for 13% of the time in 2038, which is a substantial increase from its current near 0% usage and a significant increase in overflight of Horsham District.
- 2.18 Whilst it is not appropriate to make further comment on this issue in our adequacy of consultation representation, the Council does have significant concerns that those potentially affected by greater overflight have not been made directly aware of the Project. This is because part of the WIZAD route is outside of the Inner Consultation Zone, in which greater engagement was programmed by the Applicant, and so the opportunity for potentially affected residents to be made aware of the Project and to respond accordingly have, in our view, been lessened. This concern was expressed in our formal response to the autumn 2021 consultation with a suggestion that it may be necessary to repeat the Section 42 Consultation to ensure that the communities affected by the proposals are made fully aware. The Inner Consultation Zone was not amended for the summer 2022 further consultation.

The Mobile Project Office

- 2.19 As has been identified in the Joint Representation we share the concerns expressed by the Authorities around the distinct lack of public-facing consultation events. The only non-virtual event was a Mobile Project Office (MPO), which at the draft SoCC stage, the Council initially welcomed, (along with confirmation from the Applicant that the MPO would visit Billingshurst which the Council recommended). However, in our response to the draft SoCC in May 2021 we outlined that MPO visits to Horsham and Billingshurst were insufficient and we urged the Applicant to consider offering some additional MPO visits in the same locations and/or in locations in the north of the District, such as Rusper, Warnham, Colgate, Slinfold and Rudgwick, where airport activity has a greater impact on residents than in some other parts of the District.
- 2.20 The Council notes the Applicant's comments in paragraph 5.2.5 of its SoCC which states "*our Northern Runway Project newsletter will be sent to homes and businesses to further publicise the consultation within the inner zone at the beginning of consultation. Where possible, it is intended that Mobile Project Office (MPO) visits will be largely focused in this area.*" The Council does not consider that the Applicant has attempted to meet this aspiration in Horsham District. The villages of Rusper, Warnham and Rudgwick are all

³ [Horsham District Council's Response to Gatwick Northern Runway Project Statutory Consultation](#) (2021) (paragraph 6.14, p.20)

⁴ More information on Gatwick Airport departure routes can be found on the Applicant's website https://aircraftnoise.gatwickairport.com/wp-content/uploads/2021/06/airspace_Departures.pdf

⁵ (SID - Standard Instrument Departure Routes)

located in the Inner Consultation Zone and residents would have benefited from a visit of the MPO, particularly given the poor public transport connections in some of the villages. It should be noted that Horsham District has a notably elderly population structure, which is recognised in other evidence base documents collected by the Council and in the recent 2021 Census data, indicating a greater potential to affect mobility and the ability of some residents to travel by car or over longer distances to attend information events.

- 2.21 The Council considers that the provision of the MPO has been disappointing for a number of reasons. Firstly, the Applicant only intended the MPO to act as a distribution point for consultation materials or for staff to help members of the public book telephone surgery appointments. Staff made available at the MPO were only able to signpost the Consultation and were not able to answer any technical questions.
- 2.22 Given that it seems that the MPO was only really intended to be a publicity opportunity to promote the existence of the Consultation, rather than to answer any direct questions, it is surprising how underwhelming the MPO's presence was. We have received complaints from stakeholders in this regard (appended to this representation as appendices 1-3). For residents in the District, it is considered that only those who were aware of the MPO visit already through other publicity channels would have realised the purpose of the van; there was no signage on or surrounding the van (please see pictures in the appendices).
- 2.23 The Council is also disappointed that our advice on the locations for the siting of the MPO were not followed. In the Council's feedback to GAL on the draft SoCC in May 2021, we advised that the Carfax in Horsham town centre would be the most appropriate location for the MPO visits and provided contact details for Council officers to arrange the appropriate permits within plenty of time. GAL did not follow this advice and events were arranged for Waitrose car park (located in Horsham's town centre). Once the SoCC was published in August 2021 these events were cancelled by Waitrose which meant that the published SoCC contained incorrect information about the MPO visits to the District for the majority of the consultation period. This also resulted in additional officer time assisting the Applicant to arrange replacement locations (in Horsham Carfax as originally recommended).
- 2.24 Paragraph 5.6.20 of the Applicant's Consultation Report details that the SoCC contained the dates and times for the MPO visits and Table 5.4 in the Report refers to the MPO locations and suggests that the events in Horsham were held at The Bridges Leisure Centre in Broadbridge Heath. This reference to the SoCC is incorrect as this document referred to the original locations in the Waitrose car park in Horsham town and is available to view on the [Applicant's website](#). The Applicant's associated [Consultation Summary Document](#) and the [Consultation Overview Document](#) (also both on the Applicant's website) do reflect what is contained within the Table 5.4 and refer to events at The Bridge Leisure Centre. This is a venue the Council did not and would not have recommended as it is not central to Horsham town.
- 2.25 Although the Consultation Summary and Overview documents refer to The Bridge Leisure Centre, they do not refer to the updated venues in Horsham Carfax and we are therefore not clear how the updated Carfax location was promoted on the website, as suggested.

The Applicant also refers to updates on social media outlets and 'what3words' but these outlets would not have been readily accessible for some Horsham District residents.

- 2.26 The Council considers that without prior knowledge of the MPO visit and considering that the published MPO schedule became inaccurate within the first few days of the consultation, and with minimal advertising of this fact, the MPO failed to properly alert local communities in the District to the Consultation. Given these issues, the Council is very concerned that there is limited awareness of GAL's expansion plans among Horsham District residents and businesses.
- 2.27 The Council has had regard to Table 5.5 of the Applicant's Consultation Report which details the final locations of the MPO locations. Firstly, the venue on 17 September 2021 is incorrectly referenced as Three Bridges Leisure Centre, this is incorrect as it is The Bridges Leisure Centre. It is unclear if this is a typographical error or whether it was advertised as this, which would have been misleading because Three Bridges is in Crawley. The Council also notes the surprisingly low numbers of people visiting the MPO on 17 September, 2 and 21 October respectively as 2, 7 and 2 people. The Council considers that this reinforces our view that people weren't aware of the MPO prior to or during the visits to Horsham District.

Document Inspection Locations

- 2.28 The Council advised that hard copies of the documentation should be located in all libraries in the District (Billingshurst, Horsham, Southwater, Henfield, Steyning, Storrington and Pulborough). In response to the May 2021 formal SoCC consultation, the Authorities were advised that for each of the 10 host and neighbouring authority areas consultation documents would be made available in two public buildings. In this regard, the Council advised Horsham and Billingshurst libraries would be the most appropriate locations, but noted that this is not as many locations as we originally suggested and would have preferred.

Engaging with Horsham District Communities, Interest Groups and the Hard-to-Reach

- 2.29 In providing our informal comments on the approach to reaching as many people as possible in Horsham District, the Council advised the Applicant to use a variety of different media formats and to ensure that the older generation in the District was able to access consultation documents in more traditional formats (e.g. paper copies made publicly available and information in local newspapers and magazines. Flyers, notices and posters throughout the District were also suggested). We recommended reaching out to the younger population through the use of social media and suggested the potential of holding some events in secondary schools and colleges which would also extend awareness of the proposals to local families.
- 2.30 In our April 2021 response to the draft SoCC the Council provided the Applicant with a full list of all the Parish and Neighbourhood Councils in the District, strongly recommending making direct contact with them all, in particular, Warnham, Rusper, Colgate and Slinfold Parish Councils. We also provided a list of all the interest groups that have engaged with the Local Plan preparation process in recent years. We assumed that the Applicant would

already be in contact with the Statutory Consultees that the Council engages in Local Plan preparation, but we highlighted it could be made available if required. We also provided a link to the Council's Statement of Community Involvement⁶.

2.31 Additionally, the Council advised that consideration to engaging with the Gypsy and Traveller community within the District would be important because this community has the potential to be particularly impacted by noise generated by changes in and around the airport. In our response to the draft SoCC in May 2021 the Council suggested that the Gypsy, Roma and Traveller charity may be able to assist in publicising consultation events and we provided the link <https://www.gypsy-traveller.org/>. Prior to the submission of the application, we were not advised by the Applicant whether contact was made with any of the organisations we suggested. We have had regard to the Applicant's Consultation Report and specifically Appendix B.23 which lists the hard-to-reach organisations and it's not clear how the Gypsy and Travelling community in Horsham District have been made aware of the Project.

Local Authority Publications

2.32 The Council provided the applicant with details of its own magazine 'Our District' which is distributed to more than 62,000 households in Horsham District three times a year and provided copy and distribution deadlines. However, the Applicant has not published any details of the Project in this magazine, which we consider is a missed opportunity given the magazine's coverage of the District.

2.33 We note the Applicant's commitment to using local authority newsletters (where publication timings allow) in paragraph 5.3.20 of the SoCC, however, we advised the Applicant of the details of our local authority newsletter in our response to the draft approach to the SoCC in March 2020, where there was ample time before the launch of the autumn 2021 consultation on 9 September 2021. The Applicant did not contact the Council to enquire about copy or publication deadlines in the lead up to either the autumn 2021 or summer 2022 consultations.

2.34 The Council notes the Applicant's response in Section 92 of Appendix B.3 of the Consultation Report (Part B - Volume 1) which states that "*timescales did not allow the inclusion of information in local authority publications*" but we do not agree with the Applicant in this regard, given the timescales we have indicated.

Summer 2022 Further Consultation

2.35 The Council received an email from the Applicant on the evening of the 3 May 2022 advising its intention to hold a further consultation in early to mid-June 2022 and requested our views on the proposed approach to consultation to be submitted by 16 May 2022.

2.36 These timescales only provided the Council with nine working days to share our views, which we considered was insufficient taking account of staff availability and resourcing and the need to continue to meet our other statutory requirements. The Applicant stated

⁶ [Horsham District Council Statement of Community Involvement \(SCI\) \(2020\)](#)

that the intention was to hold a 28-day consultation and we advised that this should be extended to a minimum of 8-12 weeks to ensure the consultation was accessible to as many people as possible over the summer holiday period. The Applicant extended the consultation to 6 weeks, which was welcomed, but it was disappointing that it was not as long as we recommended.

- 2.37 It was understood that the Consultation would present *“the updated aspects of the design of the highways works and refined proposals for the Project in some other areas”*. The Council fed back to the Applicant that we considered some aspects of what would be in the Further Consultation were vague and also considered that some aspects which were proposed to be non-statutory elements should in fact form part of a wider Statutory Consultation, given the importance of such matters as car parking and revised locations for office and hotel provision, new flood alleviation schemes and the location of the Central Area Recycling Enclosure (CARE) facility.
- 2.38 The Applicant proposed that the focus for consultation activity was on the area most affected by the updated highways proposals. The Council was concerned with this, given that traffic generation may have a much wider impact than just the noise impacts and indicated that the Applicant’s approach would fail to capture this sufficiently. It is our understanding that the focus for consultation activity was not subsequently altered, despite our feedback.
- 2.39 One of the key concerns we expressed with the Applicant’s proposed approach to consultation was that the Applicant intended to hold a virtual-only consultation with no public-facing events. We expressed that this approach may have excluded some members of the public, (particularly older residents who are less likely to engage online, and who form a significant portion of the District’s population, as outlined in para 2.20) who might otherwise have been interested in commenting on the proposals, from inputting into the consultation. We queried the justification for this approach given that, earlier in the Year (February 2022), the Government had removed all domestic Covid restrictions in England and there were no limits on any form of contact or public meetings. We suggested that the inclusion of some in-person exhibition events would create a more robust approach to consultation, although this advice was not heeded, and a virtual-only approach was undertaken.
- 2.40 In addition to the length of the consultation, we also queried its timing, taking place concurrently with the Topic Working Groups. These working groups have been regular two-hour meetings between the Applicant and the Authorities to discuss the emerging proposals. We suggested that it would be preferable to hold the Consultation in September 2022, after the Topic Working Groups had concluded, therefore allowing any refinement to the proposals made following our input and that of the Statutory Consultees to be incorporated into the consultation. However, the timing of the consultation was not altered.
- 2.41 Finally, in our response, we included a tabulated list of additional information we required to understand the proposed approach to consultation in more detail. We requested information such as the confirmed list of Statutory Consultees, details of the media channels to be used, a list of the ‘Prescribed Persons’, details of the advertising campaign, how hard-to-reach audiences were to be reached, amongst other requests for information.

The Applicant did not provide this to the Council, although we note that this information is provided in the Applicant's Consultation Report which was shared with the Council on Friday 7 July following submission of the DCO application.

Summarised View of the Council on the Applicant's Approach to Consultation

- 2.42 In reviewing the Applicant's approach to developing the SoCC, particularly in light of the advice PINS provide in its Advice Note Two (and as detailed in paragraph 2.2 of this Representation), the Council considers that the Applicant has provided sufficient opportunities for the Council to share our views on the development of the SoCC and this has been welcomed.
- 2.43 However, the Council considers that the Applicant has only made tokenistic changes to its approach to consultation as a result of the feedback we have provided and has not sought to adapt its approach sufficiently in light of the local knowledge that we have been able to provide. This is disappointing and whilst the Council acknowledges PINS advice which states that "*a developer must have regard to any comments a local authority provides at this stage but is not required to act on them*" we do not consider that the Applicant has sufficiently justified why it chose not to follow a significant proportion of the suggestions that we made.
- 2.44 The Council has had regard to the Applicant's Consultation Report and specifically Appendices B3 and B4 in Part B - Volume 1 which details the Applicant's responses to local authority feedback on the draft SoCC in 2020 and 2021 plus the feedback in 2022 to the further Summer
- 2.45 We are of the view that the recommendations we made would have provided the Applicant with a more effective and robust consultation and helped to ensure that communities in Horsham District were given the opportunity to comment on and therefore inform the proposals. The Council considers that there have been missed opportunities and we are concerned that there could be an unacceptable number of people in the District affected by the proposals who have not been either made aware of the Project or provided with sufficient opportunities to understand the proposals in detail.

3.0 SECTION 42: DUTY TO CONSULT PUBLIC CONSULTATION AND LOCAL AUTHORITY ENGAGEMENT

- 3.1 So far as relevant to their application, an applicant must consult certain prescribed persons; each Local Authority under Section 43; and each person within one or more of the categories set out in Section 44; and when consulting a person under section 42, section 45 requires the applicant to notify the person of the deadline for the receipt of the person's response. This deadline must not be earlier than 28 days after the consultation document are received.

Public Consultation

- 3.2 In accordance with Section 42 of the Act, the Applicant conducted statutory pre-application consultation during the autumn of 2021 for 12 weeks and a further focused consultation in the summer of 2022 for six weeks.
- 3.3 Horsham District Council's response to the autumn 2021 consultation is available here: https://www.horsham.gov.uk/_data/assets/pdf_file/0018/108090/HDC_Response_Gatwick-NRP_1-Dec_2021.pdf.
- 3.4 The Council's response to the summer 2022 further consultation is available here: https://www.horsham.gov.uk/_data/assets/pdf_file/0003/118389/HDC_Response_NRP_Summer_2022_Consultation.pdf.
- 3.5 Both of these consultation responses contained the Council's feedback on the Applicant's approach to consultation (pages 20 and 10 respectively). However, in summary, the Council expressed concern around the effectiveness of the autumn 2021 consultation with a minimal presence in our District and a high volume of technical documentation with limited summaries. Our consultation feedback to the summer 2022 further consultation was somewhat more positive and we shared that the inclusion of videos depicting the road improvements and dual runway operations was very helpful. We did, however, express concern around a wholly virtual consultation with no in-person engagement, particularly given the stage of the Pandemic when more face-to-face events were fully possible.
- 3.6 In anticipation of GAL's autumn 2021 consultation and acknowledging that the Council often acts as a signposting service to local communities, together with the Planning Inspectorate's advice to members of the public to raise issues or concerns with their local authorities⁷, our Customer Service team were briefed and prepared to assist with any queries. However, we did not receive any verbal enquiries or written comments from members of the public.
- 3.7 The only other correspondence we received were representations from Warnham Parish Council and the Gatwick Area Conservation Campaign (GACC). We were also copied on an email from the community group, CAGNE (Communities Against Gatwick Noise Emissions) to the Applicant's Chief Executive, expressing significant concern around the public facing engagement, particularly around the Mobile Project Office (MPO). In accordance with the advice set out in paragraph 7 of the Planning Inspectorate's Advice Note Two, copies of all the correspondence we received are appended to this representation (appendices 1-3).
- 3.8 We did not receive any other comments or enquiries from members of the public, community groups or any other bodies in response to the summer 2022 further consultation.
- 3.9 In paragraph 5.3.14 of the Applicant's SoCC the Applicant states "*we will seek to accommodate reasonable requests for virtual (Zoom, MS Teams etc) presentations and*

⁷ Paragraph 7.4 [Advice Note 8.1: Responding to the developer's pre-application consultation](#) and paragraph 7.1 [Advice Note Two: The role of local authorities in the development consent process](#) (Planning Inspectorate)

briefings from stakeholder groups, for example, GATCOM, local authorities/parish councils, local community groups, residents' associations, MPs and others, during the consultation period'.

- 3.10 Noting this commitment and the significance of airport expansion to our Members and the wider community, particularly the affected Parish and Neighbourhood Councils, officers approached the Applicant on 16 September 2021 to ask if a briefing session could be arranged, with a further follow-up request sent on 4 October 2021. The Applicant agreed and a virtual briefing for Council Members plus Parish and Neighbourhood Councils was arranged for 18 October 2021, which was appreciated by the Council.
- 3.11 Similarly, a briefing for local authorities for the summer 2022 further consultation was arranged by the Applicant on 6 July 2022 and was intended for all affected local authorities. Again, this event was welcomed by the Council.

Engagement with the Local Authority

- 3.12 The Joint Representation provides a significant amount of feedback on the engagement between the Applicant and the Authorities. We agree and support all of the comments raised and do not intend to duplicate any of those comments in this representation. We do, however, think it's helpful to provide authority-specific examples that demonstrate the issues raised in the Joint Representation and where we feel the engagement could have been improved or did not fulfil the purpose of consultation and engagement.
- 3.13 The Joint Representation highlights that the Authorities consider there has been a lack of meaningful and effective engagement, with the Applicant not according with the spirit of the Act (and in the context of the Gunning Principles for public consultation), and the necessity for a front-loaded process. Many of the issues the Council has raised in our consultation responses, our responses to the Topic Working Groups or separate emails requesting additional information have often gone unanswered and it is the view of the Council that we will be entering the submission phase of the DCO application, with an unreasonable number of unknowns, and only on viewing the application's evidence base once submitted will we hopefully be able to find the information we have been looking to understand for some time.
- 3.14 One particular example of this is the Applicant's approach to the Cumulative Effects Assessment (CEA). Horsham District is a relatively unconstrained area in terms of environmental designations, and whilst Natural England's Position Statement on Water Neutrality has recently impacted the District, historically, we have met our own housing needs and contributed to the unmet needs of neighbouring areas. In this regard, we have a number of key strategic-scale sites, delivering thousands of homes near to Gatwick Airport along with an emerging Homes England site to the west of Ifield, which has been put forward for consideration as part of the emerging Local Plan. Therefore, ensuring that the information that the Applicant holds in relation to these sites and any other relevant planning applications is important to ensure that the potential cumulative effects of these proposals and developments are properly incorporated and assessed.
- 3.15 Whilst the Council considers that the Applicant has provided sufficient opportunities for the Council to provide the Applicant with the requisite information on planning applications

we consider should be included in the assessment, there has been considerable confusion in the approach with one very large site being both included and excluded as it had been unwittingly entered twice on a spreadsheet by the Applicant. This is a strategic site delivering at least 2,750 homes and 46,450 sqm of employment land site some 7.5km from the Airport and, understandably, we are keen to ensure it forms part of the CEA.

- 3.16 We have sought confirmation from the Applicant, requesting feedback on which sites have been included and excluded in the Assessment, but this has not been forthcoming. We did receive an email from the Planning Manager on 8 June 2023 apologising for the delay and promising to provide the feedback but, at the time of writing this representation, we have not received any feedback and it therefore remains for us to review the application documents on acceptance to check which sites have been included in the CEA. We do not think this is sufficient and speaks to a lack of meaningful two-way engagement. Whilst opportunities have been provided for us to input into this process, the Council has been left querying whether our advice has been taken into account and is concerned that strategic scale development may have been excluded from the assessment.

4.0 SECTION 48: DUTY TO PUBLICISE BROADCAST AND MEDIA CHANNELS TO REACH HORSHAM DISTRICT

- 4.1 The Act imposes a duty on the Applicant to ‘*publicise the proposed application in the prescribed manner*’. The detailed requirements for publicising the application are contained within the APFP Regulations⁸. The Applicant’s Consultation Report contains details of the Section 48 notices and this is reflected in the Joint Representation.

- 4.2 In the Applicant’s SoCC, the Applicant sets out its approach to publicity and advertising in paragraph 5.3.19 to 5.3.21 stating;

“5.3.19 We will publicise the consultation and associated activities in local media ahead of the start of the consultation period and will update local broadcast and print media channels on our activity during the consultation.

“5.3.20 Where publication timings allow, we will also use local authority newsletters to further engage with local communities.

“5.3.21 Statutory notices will be published in line with Section 48 of the Planning Act.”

- 4.3 The SoCC did not contain details of any broadcast and print media channels that were used and the Council was not advised of these channels when we were consulted on the draft approach to the SoCC, nor have we been advised by the Applicant at any point to date and have only been made aware as a result of the details contained within the Applicant’s Consultation Report. This is disappointing as we would have liked the opportunity to review the channels, given our knowledge of the local area and its communities.

⁸ [Infrastructure Planning \(Applications: Prescribed Forms and Procedure\) Regulations 2009 \(as amended\)](#).

- 4.4 It is noted from Appendix B.6 (Part B – Volume 1) of the Applicant’s Consultation Report that Section 48 Notices were included in the West Sussex County Times which is a relevant publication reaching Horsham District communities. As detailed in paragraph 2.32 of this Representation the Council considers that not publicising details of the Project and the statutory consultation in the Council’s ‘Our District’ magazine was a missed opportunity, given its District-wide coverage.
- 4.5 The Council has reviewed the Applicant’s Consultation Report Appendix B.25 (Part B – Volume 19) which contains the list of community venues for the mailing of the consultation pack. The Council was not made aware of material being sent to these venues prior to Friday 7 July 2023 when we were provided with the details of the Consultation Report and associated appendices, however, the Council considers that the list of venues in Horsham District is comprehensive with libraries, public houses, churches, supermarkets and other community venues all receiving copies.

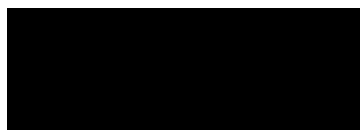
5.0 CONCLUSIONS

- 5.1 The Council shares and supports the conclusions raised in the Joint Representation. The wider purpose of consultation and pre-application engagement, particularly within the context of the importance of “front-loading” the DCO process⁹ is very important and the Council is concerned that the Consultation and pre-application engagement that the Applicant has conducted has not been as effective as it could have been.
- 5.2 In terms of the engagement to date and following a review of the Applicant’s Consultation Report, particularly within the context of the fourth Gunning Principle of “conscientious consideration” there is concern that the Applicant has not met this principle. We do not consider that the Applicant has sufficiently explained why our suggestions were not followed. For example, in Chapter 5 of the Applicant’s Consultation Report, the difficulties with the cancellation of the MPO visits to Waitrose car parks were explained, along with how these issues were rectified. However, there is no explanation why our advice to hold an event (MPO visit) in the Carfax, in Horsham town centre was not followed in the first instance and no mention of our advice on the locations has been included in the tables in the B3 and B4 Consultation Report Appendices (Part B - Volume 1).
- 5.3 It is also considered that the “Gatwick response” to our local authority SoCC comments contained within Appendices B3 and B4 do not sufficiently justify an alternative course of action with an over-reliance on the Applicant being “confident” in their approach or “selecting the most appropriate” course of action with no further explanation.
- 5.4 Given that we are concerned that our comments in SoCC responses have not been sufficiently captured in Appendices B3 and B4 nor adequately responded to, we have shared our full responses with you for a more complete picture.
- 5.5 Accordingly, we endorse the view of the Authorities in the Joint Representation that PINS should decline to accept the DCO application.

⁹ [Planning Act 2008, Guidance on Nationally Significant Infrastructure Projects and Housing](#) (paragraph 3), DCLG (2017)

- 5.6 Should the Planning Inspectorate be minded to accept the application we share the view expressed in the Joint Representation that adequate time is allowed in the pre-examination period to allow more time for progress to be made on outstanding matters, given that we will not have seen the Environmental Statement, nor other key evidence base documents, prior to the submission of the application.
- 5.7 Should you have any questions regarding this response, please contact, Carol Algar, Senior Planning Officer, Strategic Planning, at [REDACTED] [@horsham.gov.uk](mailto:[REDACTED]@horsham.gov.uk) copying in Strategic.Planning@horsham.gov.uk.

Yours sincerely



Barbara Childs
Director of Place

Horsham District Council's Adequacy of Consultation Representation

Appendix 1

Julia.Hayes

From: CAGNE Gatwick [REDACTED]
Sent: 08 October 2021 08:00
To: Stewart Wingate
Cc: [REDACTED]@dft.gsi.gov.uk; grant.shapps@dft.gsi.gov.uk
Subject: Gatwick Airport Consultation Process
Attachments: Gatwick Airport consultation van images.pdf

CAGNE
Communities Against Gatwick
Noise and Emissions

The umbrella aviation community and environment group for Sussex, Surrey and Kent

8th October 2021

Mr S Wingate
CEO
Gatwick Airport
Destination House
Gatwick
West Sussex

Dear Mr Wingate

CAGNE, the umbrella aviation community and environment group for Sussex, Surrey and Kent, would like to express concern and disappointment on the events you are staging as part of the consultation process to obtain feedback on the rebuilding of the emergency runway as a second runway. It is clear from attending your van events at many locations that residents are unaware of your presence. Consequently, they are not aware of the consultation or of what you have planned.

Most residents are unaware of your plans to go to the government planning inspectorate next year with a development consent order and seek to obtain a second runway by bringing the northern runway (emergency/ standby) runway into routine use alongside the main runway.

Currently many residents believe that Gatwick's expansion plans are no longer current and that the leaflet/newsletter concerning the expansion of Gatwick is from the council, due to the lack of business at Gatwick there would be no second runway and that Gatwick had lost out to Heathrow. We are sure you will agree, all of the above is worrying as it indicates that not enough is being undertaken by Gatwick to consult fully with those to be impacted by Gatwick's expansion plans.

Gatwick's van has been parked at several locations to date, many of which have been hidden in car parks away from the main thoroughway with little footfall.

The van resembles a food van and has very little signage as to what it is there to do! i.e. engage residents in the debate, do they support Gatwick expansion plans to obtain a second runway or not?

The van does not detail that it is seeking to consult or that there is currently a consultation taking place.

Some supermarket staff have been unable to help shoppers locate the van.

The personnel manning the van are seemingly employed to hand out leaflets, booklets, and memory sticks – we note many residents will not use the stick for fear of viruses entering their computers. The personnel do not have knowledge of what is being proposed and are unable to answer specific questions which is leading to a lot of frustration with those that do find the location of your van.

The consultation documents are lengthy as such most residents do not have the broadband speed to download or time to read these extensive documents.

We do not feel that Gatwick is actively seeking to engage with those that will be impacted by Gatwick's expansion plans, we believe Gatwick are only seeking to undertake a 'tick box' exercise to fulfil planning requirements.

The CAGNE committee finds this situation totally unsatisfactory, as such we are copying members of GATCOM, MPs to Gatwick, leaders of local authorities and ministers.

We hope that you will review this situation and rectify it by presenting an all encompassing consultation process, similar to the one you undertook when competing against Heathrow airport.

We attach a dossier of images to illustrate our concerns.

We await your response.

Yours sincerely

CAGNE Committee

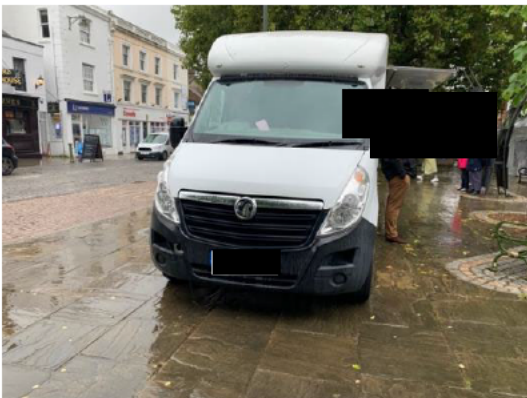
Est Feb 2014

www.cagne.org

[REDACTED]
#pledgetoflyless
www.cagnepcforum.org.uk

[REDACTED]

Gatwick Airport consultation van and lack of branding to identify the Gatwick consultation van



Horsham District Council's Adequacy of Consultation
Representation

Appendix 2

Julia.Hayes

From: Glen.Chipp
Sent: 13 December 2021 14:56
To: Carol.Algar
Subject: Fwd: Gatwick northern runway DCO consultation - not fit for purpose

FYI

Sent from my iPhone

Glen Chipp
Chief Executive

Telephone: [REDACTED]
Email: [REDACTED]@horsham.gov.uk
 



Horsham District Council, Parkside, Chart Way, Horsham, West Sussex RH12 1RL
Telephone: 01403 215100 (calls may be recorded) www.horsham.gov.uk Chief Executive: Glen Chipp

Begin forwarded message:

From: Peter Barclay <info@gacc.org.uk>
Date: 13 December 2021 at 14:50:32 GMT
To: [REDACTED]

Subject: Gatwick northern runway DCO consultation - not fit for purpose

Dear Council

We are writing to you, as the Host or a Neighbouring Authority, in relation to Gatwick Airport's recently closed consultation regarding its proposals to develop its northern runway so as to bring it into routine use and increase the capacity of the airport.

In our response to the consultation, we stated that, in our view, the consultation was not fit for purpose.

The principal reasons we gave for this were that:

- The air traffic projections in the consultation documentation give an erroneous and misleading impression of the need for the development and are not consistent with the Airports National Policy Statement. The ANPS requires airports, other than Heathrow, that are seeking to expand to demonstrate sufficient need for their proposals, additional to (or different from) the need which is met by the provision of a Northwest Runway at Heathrow. Gatwick's failure to provide an appropriate and policy compliant assessment of the need for the development means that respondents have not been able to evaluate its proposals adequately.

-
- The economic analysis in the consultation contains material errors and omissions, as explained more fully in our detailed response. As a result, the consultation gives an erroneous and misleading impression of the benefits and costs of the proposed development.
-
- The consultation overview document makes unsupportable claims about the employment benefits of the proposed development.
-
- The consultation mischaracterises the noise impacts of the proposed development, makes unsupportable assertions on noise matters and does not provide sufficient information to allow respondents to evaluate noise impacts in specific areas.
-
- Information required to enable consultees to submit properly informed proposals has not been provided.

In addition, in our view, Gatwick has not engaged with community groups or Councils in a positive and proactive manner. Questions posed in engagement meetings have not been answered promptly or at all and not all requested engagement meetings have been arranged. No opportunity for face-to-face meetings has been provided.

For these reasons, and others, in our view, the consultation is not *“based on accurate information that gives consultees a clear view of what is proposed ...”* as required by the Planning Act 2008 Guidance. It also does not provide sufficient information to allow informed responses and it does not permit the *“intelligent consideration”* required by the Gunning Principles for consultations. We therefore do not believe the consultation meets the requirements of the Planning Act and we consider that any application based on it should be rejected on the grounds of inadequate consultation.

We have specifically drawn Gatwick Airport's attention to the above matters but have had no response from it.

We note that a number of Councils have expressed similar concerns in their responses. For example:

- Crawley Borough Council's (CBC) response states: *"There is a general lack of detail [in the consultation] and we believe that GAL still needs to undertake a significant volume of further technical work to justify many of the technical assumptions underpinning this Project. This includes fundamental issues such as major evidence and information gaps in the need case for the NRP, particularly in light of national carbon reduction targets but also in relation to the basis for the passenger forecasts and underlying assumptions, and the justification for the level of associated development, including car parking"*.
- CBC also states: *"CBC has made strenuous efforts to identify, consider, and, as far as possible, offer a clear insight into what the impacts of a proposal of this scale would be on its community. Our misgivings expressed in much of the response is that the period offered for consultation fails to recognise the practical issues of mobilising often constrained and limited technical resources within the Council. ... We must point out that the Promoter has an obligation to ensure that adequate consultation includes providing statutory consultees with sufficient time to engage across all technical areas of the Project. This is fundamentally important, given that the*

Planning Inspectorate will be advising the Secretary of State on whether consultation was adequate, which is a pre-requisite for the Inspectorate to have the confidence to recommend that the applicant carries the proposal forward into Examination."

- *East Sussex County Council states: "Given the large number of complex and lengthy consultation documents it has been difficult to fully evaluate the PEIR within the time available" and "Insufficient information has been provided by GAL to enable the basis of its demand forecasts, and how these relate to the capacity that may be provided through the simultaneous use of the Northern Runway, to be properly understood in adequate detail for the local authorities to be able to comment on the impact of the proposals."*
- *Horsham Council states: " I am particularly concerned that your consultation has not been effective in highlighting your proposed changes to residents in Horsham District, with minimal presence in our District and a high volume of technical documentation with limited summaries. I am therefore very concerned that there will be many residents in the District who will be unaware of the potentially very significant changes increased growth of the airport may bring.*
- *Surrey County Council states: "We are disappointed at the lack of engagement we have had with GAL on the proposed project leading up to this consultation, especially the limited sharing of technical information, which is in contrast to our experience of working with other promoters of airport expansion schemes in recent years. This has reduced our ability to provide detailed feedback and influence the development of the project. Fundamentally, we need more information on key areas to enable us to understand and develop an informed view of the likely environmental and health effects on our communities as a result of construction and scheme delivery. Our response reflects this and sets out the areas where we have significant concerns and questions that need to be satisfactorily addressed".*

We understand that, if an application is submitted, you will be asked to submit an adequacy of consultation (AOC) representation and that the Planning Inspectorate must have regard to any comments it receives from you in deciding whether or not to accept the application.

Our firm view is that Gatwick's consultation was inadequate and not fit for purpose. We do not believe it met the requirements of the Planning Act and we consider that any application based on it should be rejected on the grounds of inadequate consultation unless and until a further, full, consultation is carried out.

We intend to make these views known to the Planning Inspectorate. However, we would be grateful if you would reflect them fully in your AOC representation in due course.

Regards

Peter Barclay
Chair
Gatwick Area Conservation Committee

Horsham District Council's Adequacy of Consultation Representation

Appendix 3

Julia.Hayes

From: Strategic Planning
Subject: FW: Objections to Gatwick
Attachments: Gatwick Airport consultation van images.pdf; Letter HDC Gatwick.pdf

From: Clerk Warnham PC <clerk@warnham.org.uk>
Sent: 20 October 2021 17:27
To: DD - Community <community@gatwickairport.com>
Cc: [REDACTED]

Subject: Objections to Gatwick

Dear All

Please find attached Warnham Parish Council's representation on relation to the ongoing consultation. We request the contents of the letter be considered.

Many thanks

Mrs Shaw PSLCC
Clerk & RFO to the Council
For and on behalf of Warnham Parish Council
Email: clerk@warnham.org.uk
Website: www.warnham.org.uk

[REDACTED]

Please note that I work 24hrs per week therefore there may be a slight delay in responding to your email.

This email is confidential and intended for the use of intended recipient only. If you have received this email in error, please inform us immediately and then delete it. Any disclosure, copying, distribution or other action taken in reliance on it is unauthorised and may be unlawful. Although this transmission and any attachments are believed to be free of any virus or other defect that might adversely affect any computer system into which it is received and opened, it is the responsibility of the recipient to ensure that it is virus free and no responsibility is accepted by Warnham Parish Council or its associates for any loss or damage arising in any way from its use.



WARNHAM PARISH COUNCIL

Clerk: Mrs Shaw

Email: clerk@warnham.org.uk

Website: www.warnham.org.uk

Facebook: @WarnhamParishCouncil

20th October 2021

Dear Carol

I am writing to you to show Warnham Parish Council's objections in relation to Gatwick.

1. Strongly oppose

In a time when there is growing recognition of the climate crisis and the detrimental effect of travel which is underwritten by carbon based emissions, airport expansion is viewed by much of the forward thinking community as being morally unacceptable.

In terms of the regional economy, there is strong evidence to indicate the view that such a development is, at best, completely unnecessary.

- Such a major infrastructure project will lead to ongoing, irreversible and significant damage to the local environment and the health and well being of the people.
- Increased airborne pollution, noise and road traffic will adversely impact the already busy area destroying quality of life, and indeed property values of local residents.
- There has been a huge amount of work at local and county level to foster wildlife and safeguard natural habitats. This has been strongly supported by local communities. Increased air traffic (with a consequent increase in road traffic), noise and pollution would be a retrograde step for the native habitats and wildlife that communities have fought so hard to support and regenerate.

2. Parish impact

As a parish we are already impacted by three departure routes and all arrivals in the west. To have two runways operating at peak times, with no guarantees not to operate during non-peak times, would be an unacceptable increase of noise and air pollution, significantly devalue homes and negatively impact the health and wellbeing of our residents

We note Gatwick has offered Surrey respite with no departures from the 2nd runway at night and ask why this concession has not been tabled for our residents; expected to endure the three departure routes plus all arrivals at night.

We believe there will be more aircraft placed in holding patterns, and as such more CO2 and other pollutants released as traffic from 2 runways do not fit on one runway as proposed.

3 Environmental concerns

We do not oppose Gatwick as an airport and local employer, but we do not feel that this is the right time for Gatwick to seek such expansion as we face a climate emergency; costs relating to mitigation of environmental damage are not fully recognised in any plans put forward.

4. Economic benefits

These are dubious. Gatwick presents a false economy to residents while it continues to actively seek to reduce jobs with automation, including baggage handling and air traffic control.

Over reliance on one customer should flag up major concerns for any business. Gatwick is reliant upon EasyJet for 63% of its total business which should be of a concern if the area is so reliant upon Gatwick for economic stability ie jobs.

5. Construction

What is proposed is a major construction of a new runway, extending outside of Gatwick's boundary. With such huge proposals for cargo, we envisage that further facilities outside the current Gatwick footprint would be required adding significant lorry traffic on local roads creating more emissions and congestion, which are not detailed in the Gatwick proposals.

The traffic growth in the SE is also ignored in your documents.

Gatwick detail 350,000 tonnes of cargo by 2047 in addition to the predicted 80.2m passengers on our roads is a significant increase.

We cannot comment on the relocation of the incinerator.

6. Landscape

With such vast reconstruction of the emergency runway, plus new taxiways, we believe that the nature and biodiversity of the land will suffer irreparably as a result of Gatwick's 2nd runway.

7. Transport and infrastructure

Getting to and from the airport:

It is unrealistic to believe that travellers or workers from Horsham, Warnham, will cycle to work. Car sharing schemes have been tried at schools and are rarely successful.

We as a parish have very limited bus service as such it is not feasible to travel by public transport to and from the airport without at best having to add significant time to travel.

Re train access: A new station does not remove the fact Gatwick sits on single railway line which is not directly accessible from Warnham station.

Lack of infrastructure and amenities – greater pressure for more housing on Sussex's' green fields, schooling, healthcare, etc.

8. Proposed road 'improvements'

These seem to be only to benefit Gatwick operations at the airport. We are very concerned about proposed feeder roads to the airport and the fact that the natural growth of traffic in the southeast is not included in your plans.

9 Public Sustainable Traffic

How much will the infrastructure for Gatwick 2 cost local authorities/ taxpayers?

Gatwick only plans a new roundabout to benefit Gatwick.

Residents that can afford electric cars may reduce emissions, but the tyres still create particles that enter the air and cause health problems, especially freight carriers.

The World Health Organisation (WHO) has tightened its global air pollution standards. It was the organisation's first-ever update since 2005. The WHO says that policymakers around the world must use these guidelines to introduce policies to improve air quality and reduce the health burden that results from air pollution. The Gatwick proposal goes against this aim.

10 Construction and managing impact

As above

11 Climate change

There is very little detail on this in the consultation and yet local authorities have mostly pledged to reduce carbon.

There is currently no commercially viable alternative fuel to fossil fuel.

Airbus themselves say that it is very difficult for aviation to decarbonize and that they do not expect production of greener planes until 2050.

Climate emergency

– More planes equate to more damage to the planet.

- Gatwick Airport's own carbon emissions (without flights) will increase from 0.77MtCO₂ in 2017 to 0.95MtCO₂ by 2028 (on pre-Covid figures).

- Extra flights from regular use of the emergency runway will generate an additional 1 ½ - 1 MtCO₂ per year by 2050** (possibly a conservative figure considering Gatwick's aims for a larger plane fleet) plus emissions from main runway growth.

*www.aeg.org.uk

12 Noise envelopes

Our residents would not benefit from the noise envelopes or the poor insulation proposed. Conversely, they would be significantly detrimentally impacted.

We are also very aware that Gatwick has submitted plans for 2 runways to NATS for FASIS. We are therefore very concerned that Gatwick will be seeking efficiency, resilience by flying ADNID as they did in February 2014; then had 3 options of ADNID as

they did in February 2014; then had 3 options of ADNID as part of LAMP and a route off the 2nd runway (now 3rd runway). This caused great anger and with Gatwick seeking to increase flights from 55 an hour to 70, this would cause more congestion, with a danger of flights over our parish with a new departure route as well as bringing arrival in closer to the ILS, runway. Dropping of wheels and flaps early to reduce speed impacts our parish already.

We are also aware that Gatwick has allowed noise groups to move noise over our parish during the day and are now seeking to repeat this at night with the imbalance on the NCF and NEX of noise groups far from the runway that do not suffer the noise that our parishioners experience day and night.

There is no mention of the light pollution Gatwick causes with incoming night time flights.

13. Lack of compensation / Insulation


Our residents will be significantly impacted but will not receive any compensation or insulation. Residents live in rural areas to enjoy the outdoors as such no insulation would work for our parish. We do however feel that full house value should be a consideration as aircraft noise devalues homes.

14. Consultation

We also believe Gatwick has operated a poor consultation to date with the van. The occupants of the van know nothing about the plans and cannot answer any questions.

There has been very little publicity about your proposal, most residents are unaware of the consultation as they believe that Heathrow was the site selected in terms of expansion plans.

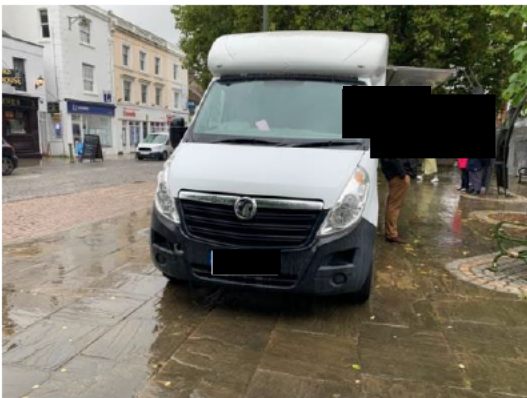
Yours Sincerely



Mrs Shaw

For and on behalf of Warnham Parish Council

Gatwick Airport consultation van and lack of branding to identify the Gatwick consultation van



**Gatwick Airport Development Consent Order (DCO)
Local Authorities' Joint (Part 1) Response to GAL, re Draft Statement of
Community Consultation (SoCC)**

Thank you for consulting the Gatwick Airport Local Authorities on GAL's Draft Statement of Community Consultation (SoCC) for the Northern Runway DCO, in line with the requirements of s47 of the Planning Act 2008.

The response below is in two parts; Part 1 is provided on behalf of the Gatwick Local Authorities and sets out joint feedback on behalf of the Local Authorities. Part 2 details specific issues identified in relation to our respective administrative areas.

For clarity, the joint response is submitted on behalf of the following Gatwick Local Authorities:

| | |
|-----------------------------|------------------------------------|
| Crawley Borough Council | Reigate & Banstead Borough Council |
| Horsham District Council | Mole Valley District Council |
| Mid Sussex District Council | Tandridge District Council |
| East Sussex County Council | Surrey County Council |
| West Sussex County Council | Kent County Council |

PART ONE: GATWICK LOCAL AUTHORITY JOINT RESPONSE

1. INTRODUCTION

Having reviewed and considered the draft SoCC, the Gatwick Airport Local Authorities are of the view that the document is too vague and open to interpretation. As currently drafted, we consider that the SoCC would not produce an effective consultation that would satisfy the Planning Act 2008, PINS Advice Notes and DCLG Guidance: Guidance on the pre-applications process. There are still a number of gaps within the draft SoCC including timescales for consultation and locations and times of exhibitions, which make it difficult to fully respond and understand in full the potential implications. This lack of clarity is a concern.

We would note that PINS Advice Note Two states that "*Some local authorities work collaboratively with a developer to prepare the SoCC in an iterative way and this is encouraged.*" Accordingly, it is best practice for a developer to issue a draft of the SoCC to the relevant local authorities for comment so that the developer can incorporate those comments prior to consulting on the SoCC formally under section 47 of the Planning Act 2008. It is disappointing that you have chosen not to follow this

approach, and instead we have been presented with the draft SoCC for the first time formally under Section 47. In light of this, we would recommend that GAL updates the SoCC with our comments and then consult the Gatwick Airport Local Authorities again once a revised SoCC is available which has taken into account our comments presented here.

The Gatwick Airport Local Authorities are also concerned that uncertainty as to how and when GAL intends to engage could result in an insufficient level of resources being designated to public consultation and engagement, meaning that the views of people living and working in the area are not adequately heard.

In addition, we think that the document should be clearer and more descriptive with regard to the project itself and the planning process surrounding it.

In terms of specific comments on section 1 of the SoCC, it would be helpful if the SoCC could provide a better summary of the proposed development, and the DCO process itself, in order to assist users in understanding what they are being consulted upon and how they can feed into this process. This includes the following points;

- To assist in providing a clearer understanding of the DCO project, the SoCC should mention (1.1.4) the restrictive planning condition which still needs to be lifted, not just the expired legal agreement. Paragraphs 1.1.4 (and 3.1.2) suggest 61mppa can be achieved “based on existing facilities”, but the Scoping Report suggests there are additional projects required to achieve this. For clarity, this could be amended to read “based on the use of the existing main runway”
- Further, we recommend that the local authorities that have been consulted are listed in paragraph 1.1.8 and that it is confirmed that their comments have been taken into account in producing the final draft of the SoCC.

2. OVERVIEW OF THE PROCESS

Additional information around the DCO process should also be added, in order to make clear the roles that GAL, the Planning Inspectorate, respondents and other stakeholders will play in each of the stages already outlined. In particular it would be useful if guidance could be provided to explain who the stakeholders are, ideally before Diagram 2.1.1, which itself could include less jargon and provide more information to explain the DCO process. Many people will not know what the words in this section mean. Although some information is set out in Section 4, we consider it forms part of the ‘overview’ of the process. We suggest, as a minimum amending Diagram 2.1.1 as follows:

- the pre-application section is confused. We suggest that 'where required' is deleted as an EIA is needed as GAL has confirmed in its Scoping Report. Further, the text in brackets needs to be reconsidered as it is not clear what it means;
- The diagram does not explain that GAL must submit the DCO to the Planning Inspectorate for independent examination, and this should be added.

The document currently provides inadequate information about the legal requirement to consult and an explanation of the provisions of the Planning Act 2008 and the associated DCLG Guidance and PINS Advice Notes. The Gatwick Airport Local Authorities recommend that this important contextual information is provided so as to assist people in viewing and reading about the process and how they can take part.

3. THE NORTHERN RUNWAY PROJECT PROPOSALS

As a general point, it would be helpful if the SoCC could provide a better summary of the works proposed through the DCO, and the DCO process itself in order to assist users in understanding what they are being consulted upon and how they can feed into this process.

We note that the first bullet point of 3.1.1 does not make sense, and we suggest rewording to read 'All arrivals to continue to use the existing main runway' instead. Paragraph 3.1.4 should include reference to 'relocation and expansion of energy-from-waste facility'.

The description of the proposed development is too brief and is not clear as to where all the elements listed in paragraph 3.1.4 are proposed to be located. For example (and the below is just a selection):

- where are the hotels and offices to be located?
- how much hotel and office floorspace are proposed (in order to carry out the PEI GAL must be assessing a maximum floorspace)?
- where are the surface access improvements to be located?
- what do the surface access improvements involve and to which modes of transport?

The SoCC should include a Site Plan showing where the elements identified in paragraph 3.1.4 are to be located. In addition, the SoCC should describe whether there are any temporary works required for the project and, if so, what they comprise.

It would also assist to confirm what the consenting strategy is for each part of the project - whether you will be consenting all elements within the DCO application and whether any compulsory acquisition powers will be sought.

On a related note, communities may want to discuss the airspace change implications of the Government's airspace modernisation programme, known as FASI-South, and also Route 4 during the public consultation. Therefore, the interlinkages with the airspace change process need to be clear. In addition, full and clearly presented information on aspects such as the temporary impact of construction and sequencing of scheme delivery will be required during the public consultation.

4. ENVIRONMENTAL INFORMATION

The Gatwick Airport Local Authorities have no comments on this section.

5. CONSULTATION

5.1 Our Approach

The key objectives should be supplemented by explaining the purpose of the consultation. Further in paragraph 5.1.1 the objectives appear quite negative. In the third bullet point why are only 'sufficient' opportunities being provided? In the fifth bullet point we suggest GAL should be adopting an approach where it not only meets but also exceeds the requirements of the Planning Act 2008.

It is stated that the consultation will take place over a minimum of eight weeks (5.13), but there is no information given as to the specific dates when this will take place. As it stands, the proposed eight week period will significantly restrict the authorities' ability to fully engage Members in the process. Furthermore, such a short consultation period provides significant doubt as to whether authorities would be able to respond in a timely manner, owing to the need for any response to be approved through the relevant internal decision-making processes.

Formal consultation should be for at least 12 weeks (not eight), to allow for local authority internal governance (i.e. officer review and preparation of report to members and member sign-off), and for members of the public to be given enough time to fully engage in the process. As much advance notification as possible should be provided of when the consultation is to commence.

GAL should also note that authorities' decision-making processes are restricted during pre-election periods. Consulting through any pre-election period would further impair authorities' ability to respond.

The consultation period should exclude August, as this is the school holidays and there are unlikely to be cabinet/committee meetings for officers to get the necessary sign-off of decisions. This is a month when members of the community are on holiday and so would be less likely to be able to attend.

Authorities seek assurance that GAL would delay / extend their consultation period should Public Health advice regarding Covid-19 suggest public gatherings /meetings should not take place.

As explained above, unless details are provided of when the consultation is taking place, and for how long, then it is impossible for the Gatwick Airport Local Authorities to respond properly on this consultation. This information must be provided and consulted upon. Reference is also made to 'further stages' of consultation. It should be explained under what circumstances this would happen.

In respect of paragraphs 5.1.4 and 5.1.5 it would be helpful if the SoCC explained how this consultation will be undertaken.

5.2 Who we will consult?

The section on who will be consulted is considered too vague. There is no real attempt to define who will be consulted. A statement that 'anyone with an interest in the Project who considers they may be directly, or indirectly impacted' is insufficient. This is supplemented to say 'anyone who lives, works or otherwise use the areas closest to Gatwick.' Again this is considered inadequate. Unless GAL defines who they are

consulting it is difficult to see how it will ensure all groups are consulted. The document needs to take a much more holistic view in explaining who GAL will be consulting.

Although not exclusive it is considered that the SoCC needs to identify business groups, community services, parish Councils and resident groups that it will consult - we would expect the SoCC to identify these, rather than contain vague phrases.

Inner and outer zones

It would assist if the plan which shows the map of inner and outer consultation zones was larger and clearer, and if the Gatwick Airport Local Authority boundaries could be layered onto it. Information quantifying the number of residents and businesses proposed to be consulted in each zone should be provided in Paragraph 5.2.4.

The definition of consultation zones seems to pre-suppose that noise will be the principal issue. Whilst we consider that noise is a significant issue, there are other issues that have the potential to impact on the residents, stakeholders and the environment outside the noise contours including surface access, aircraft overflight, associated development concerns and other potentially significant environmental effects such as visual impact and air quality.

The inner consultation zone should therefore be extended to at least also include areas where there may be adverse traffic impacts and/or improvement works; areas within the identified visual zone of influence; and areas identified as potentially impacted by air quality within the EIA Scoping Report.

In any event the inner consultation zone as presently broadly shaped around the 51 dB(A) Leq noise contour in 2038 is considered to be inappropriate. The inner consultation zone should instead include all households that would fall within the 51 dB(A) Leq noise contour of the year that the northern runway operations commence, and not the 2038 contour. This would ensure that all those residents likely to be affected by aircraft noise associated with the proposed development would be fully informed of this consultation. By using the 2038 contour, GAL seriously risk ineffective consultation by failing to actively notify those households that will be immediately impacted by use of the northern runway upon opening, that do likely not fall in the 2038 contour or within the 51 dB(A) Leq contour today under single runway operations.

Furthermore, where part of a settlement falls within the suggested contour that will inform the inner consultation zone, all households in that settlement should be treated as within the inner zone and should therefore be sent the same information. It is also important to note that GAL cannot be certain that there will not be people affected by a change in noise climate outside of the 51dB contour. Indeed, aircraft may still be below 4,000ft beyond this contour and these areas, where there is potential for likely significant noise effects, should also be included in the inner consultation zone.

We note that the wider outer consultation zone has been defined to include the Gatwick Diamond (GD) regional economic area. The Gatwick Diamond (GD) is a regional economic area; it is quite obvious that is not a perfect fit when it comes to consulting on a proposal with such a wide range of environmental impacts as the project and which potentially affects residents and businesses within a wide geographic area. We therefore consider that the outer consultation zone should be further extended in a number of different areas so that it includes areas which could be subjected to increased overflight as a result of the project. These will be detailed in individual local authority responses.

We believe that there is also a need for some additional exhibitions to take place outside of the GD boundary. With this in mind we suggest that the GD area is used on an indicative basis with a soft boundary, and that in instances where there is a justified need, exhibition events take place outside of the GD area. These will also be detailed in individual local authority responses.

The details in paragraph 5.2.3 which explains how consultation will be undertaken in both the inner and outer consultation zones is inadequate. Far more detail is needed here with firm commitments to consultation which can then be measured.

Hard-to-reach groups

There should be more detail provided on what GAL consider to be 'hard-to-reach' groups and the groups actually identified in the SoCC. It should be made clearer how 'hard-to-reach' groups will be targeted – who they are, how they will be made aware of the project, and how they will be helped to provide feedback. Detailed lists of specific organisations are provided in individual local authority responses detailed in Part 2 of this response.

The draft SoCC contains references to events that 'may' be organised or activities that 'could include', but it is not clear what GAL is committing to or not, as the case may be, and therefore it is difficult for the local authorities to assess the adequacy of the proposed consultation. We would expect to see reference given to the Equality Impact Assessment (EqIA) that GAL has carried out to make clear how this has been used to inform the format of the consultation process.

We would also expect to see a section included within the final SoCC which summarises the measures undertaken to ensure that the consultation is accessible to all. This should include making the website and documents accessible to people using audio transcription software and making Easy Read versions and different language versions of all documents available upon request. Venues for the exhibitions should also be accessible to the visually, and mobility impaired and those with prams.

It would also be helpful if the SoCC could consider whether there are parts of the local community that may be disproportionately affected (see paragraph 5.3 of PINS Advice Note 2).

5.3 How we will consult

In section 5.3.1, details of document deposit points (such as the number and location) have not been provided so we are unable to comment on whether they are sufficient and suitable. These should be included in the final SoCC and, prior to the finalisation of this list, the local authorities should have the opportunity to formally comment on the list proposed.

There are some members of the community who do not have access to the internet and it is therefore very important that there are enough Document Inspection Locations to ensure that everyone who wishes to view the documents is able to do so. It is vital that GAL's engagement is as accessible as possible, and consultation information should be widely available at a range of publicly accessible locations during the consultation. Libraries as well as Council Offices can be an easily accessible location and suggestions are therefore included in Part Two of each authority's response.

In addition, no details have been provided regarding how long the information would be available for. We suggest the information should remain at the deposit points until the DCO application is submitted, at which point it could be replaced with the final documentation. We note that it is somewhat unclear (5.3.1) as to what the difference is between the 'consultation summary document' and the 'consultation overview document'. It would be useful if this could be clarified.

The fee for participants to request information (5.3.2) is very high at £500, meaning that only people with surplus income may be able to request this. Whilst it is understood that there needs to be a fee to discourage unnecessary printing, setting it at £500 may genuinely bar some from fully engaging with the consultation. We would like this to be reviewed, as this seems unreasonable.

In addition, all 'Host' and Neighbouring authorities should receive a full printed set of the consultation documents upon request.

With regards to paragraph 5.3.7: the newsletter should include details of how people can engage with the process online. This should include links to where information can be found, and how they can sign up to be kept up to date electronically throughout the process.

The SoCC should also include details of how personal information is to be protected, including what will be collected and how it will be used. A privacy notice might be the most appropriate method for this.

We consider that residents and businesses should have the opportunity to engage with all pre-submission evidence base materials – the SoCC as currently worded focuses predominantly on the PEIR consultation.

Exhibitions and events

The Gatwick Airport Local Authorities are varied in terms of their demographics and character, and in order to ensure that GAL's engagement is sufficiently inclusive to capture representative views, there is a need to ensure that engagement approaches, including the advertising of events, and the location and timing of these events, reflects the varied population and local circumstances of our areas.

The lack of the clarity and information in the draft SoCC regarding the specific locations, dates and times of exhibitions is a significant concern and prevents the councils considering whether the consultation will be adequate. If this information was not available when the SoCC was sent to the Gatwick Airport Local Authorities then the consultation should have been delayed. This information is expected to be detailed in the draft SoCC to enable meaningful comments on each. We therefore consider that there should be a further formal consultation providing this level of detail.

GAL has stated in the draft SoCC that it will hold 17 consultation exhibitions. We are concerned that this number of proposed events is insufficient. During consultation on Local Plans local authorities typically hold multiple events in much smaller geographical areas than GAL is proposing. Given the potential impact of these proposals on such a large number of people in a wide geographical area, we strongly recommend that more events are programmed to enable members of the public and other stakeholders the opportunity to understand the proposals in more detail.

The limited number of events and the distance between them strongly suggest that it is assumed that an individual will be able to attend their local event on whatever date and time it is held. This is not realistic. Also, there should be more than one exhibition

in the Inner-Zone areas most significantly impacted by the project to ensure those working shifts and with other limitations can have a greater opportunity to attend.

Several Local Authorities have already asked for a number of additional specific locations for exhibitions, as part of the informal consultation during December 2019. These will be included in individual responses. We therefore ask that GAL revisits these recommendations and adds them to the existing list of exhibition locations.

As a useful comparison, we have also had regard to the Statement of Community Consultation publicised by Heathrow Airport Limited (HAL) for the third runway DCO. In terms of capacity, both the Heathrow third runway proposals and Gatwick's expansion proposals will increase the passenger throughput by over 50% for both airports (based on the capacity generated by Scenarios 1 and 2 in the Gatwick Airport Masterplan). It is therefore considered that the number of events for Gatwick expansion should be much higher and similar to the number of public exhibitions that HAL proposed (43).

It is noted that p.10 of the Draft Statement of Community Consultation (SoCC) contains the proposed general locations for consultation exhibitions, however it does not contain the dates and times for these events and it is our understanding that GAL will not be providing this information to the local authorities before the publication of the SoCC. It is therefore not possible for the local authorities to fully assess if these events will provide adequate opportunities for members of the public to easily access an exhibition event.

We consider this to unacceptable, and it is vital that specific locations are identified in liaison with the relevant local Authorities and that further consultation is undertaken on the proposed list.

With regard to the type of events undertaken, it is considered that the SoCC needs to present the balance between community and shopping centre events, not least as it cannot be certain that the latter allow for proper engagement with experts to discuss the proposal and may be aimed simply at collecting numerical support for the proposals. There should be some flexibility in the type of consultation event held to enable GAL to be able to respond to outcomes of the evidence base that is currently being prepared. For example the full extent of the surface access and environmental impacts are not yet fully understood. There may be a need to hold more focussed community events in areas particularly impacted from something that is currently unknown, and this should be set out in the SoCC.

The current status of times for exhibitions within the draft SoCC as 'tbc' suggests there is no guarantee that the exhibition would be over a time period which would give as many people as possible the opportunity to attend. We strongly suggest that the timings enable members of the public to access the events during the day, evening and weekends, accounting for the working population, commuting times and any other constraints members of the public may experience. We recommend 2pm – 8pm on a weekday and 10am – 4pm on Saturdays. Again, we would urge GAL to work with the Local Authorities to identify the most appropriate times to ensure that events are accessible and inclusive for as many people as possible.

Additionally, there is no indication that there will be any unmanned exhibitions in public areas which would enable those without internet access to view the consultation information and complete paper surveys. We recommend this is included.

Additional consultation and engagement activities

In the section on Presentations and other events (5.3.10 – 5.3.15), the draft SoCC is too vague in respect of whether other activities may be carried out. The document states; ‘other events may be carried out, if considered necessary and appropriate’ and ‘Additional events may be organised if necessary’. There is no information given as to how people make requests, who would be making the decision as to whether something is deemed ‘necessary’ and ‘appropriate’ and how GAL will engage with local authorities and residents to decide this. We think this information should be included within the final SoCC.

Paragraph 5.3.10 of the draft SoCC states that GAL will “*seek to accommodate reasonable requests for presentations and briefings*”. However, there is concern that this statement is not measurable, nor will it commit GAL to undertaking a certain number of presentations/events with the stakeholders highlighted. To meet the objective set out in 5.3.10 it is suggested that GAL could record the details of the requests from these stakeholders and make them publicly available (or, as a minimum, share the requests with the local authorities) and provide details of which requests have been met with a presentation or briefing as suggested.

The draft SoCC provides little detail in regards to the Project Freephone Hotline and what the relevant dates and timings will be for this service (e.g. will it just be 9am-5pm Monday – Friday?). Further details should be included in the final SoCC.

Paragraph 5.3.14 mentions that unstaffed exhibitions “may be organised if necessary”. These should be identified in the draft SoCC in order for authorities to be able to meaningfully comment on the proposals. They would need to be organised and publicised to the public from the outset as such events are important in enabling those people without internet access to view consultation materials at a range of times and places. Such individuals may wish to complete paper surveys and so a freepost address should be provided for all written responses. This is referred to in relation to the public exhibitions but is unclear whether this applies more generally for those providing written responses.

GAL should also list in the SoCC the other publicity events such as ‘pop up’ events that were discussed in the TWG. These can play an important part of the consultation and not listing them impedes the local authorities’ ability to meaningfully comment on proposals.

We advise that GAL contacts parish councils, resident groups and groups of interest within the inner and outer zones directly about the consultation. Also, there are certain groups that are organised and already engaged with GAL’s expansion plans, and would provide GAL with the opportunity for targeted and specific consultation.

It must be ensured that adequate advance notice is given for the exhibitions when it comes to announcing the times and dates of exhibition events. This should be at least four weeks prior to the first exhibition and this commitment should be stated within the final SoCC.

We would also like to see a commitment within the final SoCC to provide local authorities with a schedule of social media posts prior to consultation

General comments on promotion and publicity

The SoCC should specify publicity initiatives that GAL will undertake, as the caveat 'where appropriate' is considered non-committal and therefore makes commenting meaningfully difficult at this stage.

The SoCC states that the Newsletter, which is the only document being sent directly to residents and businesses, is only to be distributed within the Inner Consultation Zone. As set out above, this is not considered to accurately identify all those who will be significantly affected by the proposals. Each authority will identify additional areas they consider should receive this direct mailing.

Paragraph 5.2.8 refers to bespoke presentations, but the local authorities would like to know how people will be made aware that these are available, what sort of publications might be targeted, and how will those who cannot travel be reached?

Specific details of publicity should have been provided in the draft SoCC in order for local authorities to be able to comment on whether outlets are appropriate and would give sufficient coverage. Details have not been provided of where and how the consultation on the scheme would be advertised to accord with the Planning Act, so we are unable to comment on whether this would help to cover off some of our concerns over publicity. We therefore consider that there is a need for further formal consultation on proposed dates, timings and locations of proposed promotion and publicity.

GAL should ensure that all information submitted during the consultation period is shared with the Gatwick Airport Local Authorities, via on a web based portal to ensure authorities can engage thoroughly in a timely manner.

6. CONCLUSION

The above sets out the collective feedback of the Gatwick Airport Local Authorities on the SoCC and the proposed consultation approaches set out within it. To reiterate,

- For Council elected Members to be properly and effectively engaged during the statutory consultation process the consultation period must be extended to 12 weeks.
- The consultation undertaken by GAL should enable as many people as possible to engage in the process.
- To be effective, engagement will need to be inclusive and accessible.
- A range of different events, including unmanned exhibitions, at appropriate locations and times is required.

Our concern is that the draft SoCC, in its current form does not achieve this; and we would urge GAL to work positively with each of the Gatwick Airport Local Authorities to maximise the opportunity for people to participate in this consultation using the most locally appropriate engagement approaches. We would like to request that we receive feedback on the comments raised above, and to be consulted on a further version of the SoCC.

PART TWO: HORSHAM DISTRICT COUNCIL'S RESPONSE

Horsham District Council would like to raise the following comments in relation to the specific aspects of the proposed community consultation relevant to Horsham District.

1. Consultation areas and the location of events

As detailed in our initial informal response sent by email on 20th November 2019, we recommended that events should take place in Horsham, as it is the District's main town, plus a recommendation to hold events in Warnham, Colgate and Rusper, as these villages experience significant impacts already as a result of overflight. We also recommended that an event could take place in Billingshurst, to provide residents in the south of the District an opportunity to understand more about the proposals.

We are pleased to see that Horsham town and Billingshurst have been selected as locations to hold exhibition events, however, it is disappointing that more events are not being held in Horsham District. As detailed in Part 1 of this response, the joint local authorities all agree that more events should take place to provide as many different stakeholders and members of the public ample opportunities to attend an exhibition event.

During the presentation made by GAL to the local authorities regarding the SoCC, a slide was included which showed the flight paths associated with the airport and how the outer consultation zone has been devised using the Gatwick Diamond area and that exhibitions have largely been focused on the inner consultation zone which has been devised around the 51dB(A) Leq noise contour in 2038 with the Northern Runway in operation.

Firstly, the Gatwick Diamond area does not cover the area where flight paths extend much further west, over West Sussex and in particular, Horsham District. There are some areas outside of this consultation zone that, arguably, are more affected than some areas within it, particularly when considering overflight and other potential impacts as a result of the DCO. The Council consider that fair and equitable consultation can only be achieved by extending this consultation area to include areas of overflight, rather than focusing solely on the Gatwick Diamond area.

Secondly, it is noted that exhibitions are largely being focused in the inner consultation zone, although none of the proposed exhibitions are located in or near the villages we consider are already significantly affected by the airport (including Warnham, Rusper and Colgate). It is also considered that there are areas, for example, the village of Slinfold to the south west of Horsham, which are outside of the inner consultation zone but are increasingly experiencing overflight. These areas fall outside of this inner consultation area and will not receive the project newsletter. It is therefore strongly recommended that the inner consultation zone should also be extended further west to cover these areas of overflight.

Finally, the selection of the inner consultation zone using the 51dB(A) Leq noise contour as it is projected to 2038, is based on current airport operations and does not take into account the changes that may take place as a result of the FASI-South Airspace Modernisation programme. Whilst the outcome of this programme is not yet known and will not be for some time, the possible impacts of this programme, together

with the growth that is proposed to take place as a result of the Northern Runway Project, do need to be considered. Therefore, it is important to expand the inner and outer consultation zones as recommended above to ensure that all residents that could potentially be affected by all future growth scenarios associated with the airport have the opportunity to participate fully in the consultation.

2. Document inspection locations

In our informal email response to the draft SoCC sent on 20 November 2019, we suggested that hard copies of the consultation documentation should be made available at Horsham District Council offices plus the following library locations: Billingshurst, Horsham, Southwater, Henfield, Storrington and Sullington and Pulborough.

It is understood that GAL has suggested that there will be 15 hard copies of the consultation documentation made available across all the Gatwick local authority areas. Therefore, officers were advised by GAL to suggest approximately two locations for these deposit points. Whilst we would still suggest that hard copies are made available in the locations we have recommended, we would otherwise suggest, as a minimum, that a hard copy of the consultation documentation should be made available at the Council offices (Parkside) in Horsham and at Billingshurst Library.

3. Interest groups

Please find attached, as appendices, details of all the Parish and Neighbourhood Councils located within Horsham District. We strongly recommend that direct contact is made with these Councils, in particular, Warnham, Rusper, Colgate and Slinfold Parish Councils.

We have also attached a list of all the interest groups that have engaged with the Local Plan process in recent years. By no means is this list meant to be exhaustive and it is not necessarily considered that all of these groups will have a specific interest in the Northern Runway Project, however, it does provide a useful starting point for engagement with those stakeholders who have been actively engaging in development proposals affecting Horsham District.

We have not included a list of the Statutory Consultees that we, as a local planning authority, would ordinarily consult on in the course of Local Plan preparation, as we assume that GAL is already engaging with many, if not all, of these organisations which include organisations such as other local authorities, utility providers and national and public bodies. However, we would be happy to provide this list should you wish to be sent a copy.

We also commented in our informal email response of 20 November 2019, that consideration should be given the Gypsy and Traveller community within our district and GAL has not expanded upon how it intends to reach this community. As highlighted in the earlier comments on hard-to-reach communities in Part 1 of this response, the joint local authorities consider that more detail should be provided by GAL on what it considers to be 'hard-to-reach' groups and what measures will be taken by GAL to engage these groups .

4. Local Authority Publications

It is understood that GAL asked for details of any local authority publications in which information regarding the Northern Runway Project could be circulated across a wide geographical area.

Horsham District Council publishes its own magazine, entitled 'Our District', which is distributed by Royal Mail to 62,000 households in the Horsham District twice yearly. The next edition will be the Summer 2020 magazine and is due to be distributed from Monday 6th July. To be featured in the magazine, the advertisement booking deadline is Wednesday 13 May and the advertisement copy/artwork deadline is Wednesday 20 May. For further details and information regarding the rates please visit the following link <https://www.horsham.gov.uk/news/our-district-magazine>.

PART 3. APPENDICES

1. Parish Councils and Neighbourhood Councils in Horsham District

Amberley Parish Council
Ashington Parish Council
Ashurst Parish Council
Billingshurst Parish Council
Bramber Parish Council
Broadbridge Heath Parish Council
Coldwaltham Parish
Colgate Parish Council
Cowfold Parish Council
Henfield Parish Council
Horsham: Denne Neighbourhood Council
Horsham: Forest Neighbourhood Council
Horsham: Trafalgar Neighbourhood Council
Itchingfield Parish Council
Lower Beeding Parish Council
North Horsham Parish Council
Nuthurst Parish Council
Parham Parish Council
Pulborough Parish Council
Rudwick Parish Council
Rusper Parish Council
Shermanbury Parish Council
Shipley Parish Council
Slinfold Parish Council
Southwater Parish Council
Steyning Parish Council
Storrington and Sullington Parish Council
Thakeham Parish Council
Upper Beeding Parish Council
Warnham Parish Council
Washington Parish Council
West Chiltington Parish Council

West Grinstead Parish Council
Wiston Parish Council
Woodmancote Parish Council

2. Organisations and Interest Groups

Action in Rural Sussex
Adversane Residents Association
Age Concern (Horsham)
All England Jumping Course
Ashington Business Consortium
Ashurst Women's Institute
Billingshurst Chamber of Commerce & Industry
Billingshurst Community Partnership
Billingshurst Family Church Religious Group
Billingshurst Wednesdays Older Persons Group
Blackstone Community
British Horse Society
Broadbridge Heath Football Club
Campaign Against Gatwick Noise and Emissions (CAGNE)
Coast2Capital
Cowfold Air Quality Group
CPRE Horsham & Crawley
CPRE Sussex
English Heritage
Federation of Small Businesses (Sussex)
Friends of Chesworth Farm
Friends of Shoreham Beech
Friends of Warnham Nature Reserve
Fulking Social Committee
Gatwick Area Conservation Campaign (GACC)
Gatwick Diamond
Hassocks Angling Club
Henfield Community Partnership
Henfield Parish Magazine Religious Group
High Weald AONB Partnership
Horsham Blue Star Harriers
Horsham Chamber of Commerce & Industry
Horsham Disabled Persons Group
Horsham District Cycling Forum
Horsham Golf & Fitness Club
Horsham Older Peoples Forum
Horsham Society
Horsham Town Community Partnership
HYPER (Younger Persons)
Ifield Golf Club
Ifield Society
Keep Southwater Green
Kingsfold Residents Association
Langhurstwood Road Residents Group



LEP (South East)
Littleworth Residents Association
Locals Against Mayfield Building Sprawl (LAMBS)
Lower Beeding Church Religious Group
Mannings Heath Action Group
Norbertine Order Religious Group
North Horsham Residents Association
Nuthurst Society
Old Sussex Stud Residents Association
Pulborough Community Partnership
Pulborough Society
RSPCA Sussex North
Rudgwick Action Group
Rudgwick Preservation Society
Salisbury Road Residents Association
Saxon Weald
Sandgate Conservation Society
South Downs Society
Sport England (Planning South)
Sussex Area Ramblers
Sussex Biodiversity
Sussex Enterprise
Sussex Nomads Cycling Club
Sussex Traveller Action Group
Sussex Wildlife Trust
Sustainable Henfield 2030
Steyning Society
Storrington Air Quality Group
Thakeham Village Action Group
The Haven Preservation Older People's Group
Warren Estate Residents Association
West Grinstead Action Group
West Sussex Local Access Forum
West Sussex Sustainable Business Partnership
West Sussex Joint Strategic Needs – Health
Wey & Arun Canal Trust
Wimblehurst Road Residents Association
Woodland Trust

Jonathan Deegan
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28 May 2021

Dear Jonathan

Gatwick Airport Northern Runway Programme: Revised Statement of Community Consultation - Horsham District Council's Response

Thank you for the opportunity to formally respond to the contents of the Statement of Community Consultation (SoCC). The SoCC sets out how Gatwick Airport Ltd (GAL) intends to consult the local community about its proposed Development Consent Order (DCO) application for the Northern Runway Programme (NRP).

We are fully aware of the impact of the global pandemic on the aviation industry and the knock-on impact this has had on the timeline for the Airport's NRP. We are sympathetic to these very challenging circumstances facing GAL and the wider aviation community and acknowledge the positive contribution the Airport makes to the wider economic region. We also understand GAL considers that delivery of the Northern Runway Programme will help to aid recovery of the Airport in the longer term.

However, the scale of expansion proposed is significant and the potential impacts on both host and neighbouring authority areas have the potential to be significant and far-reaching. It is therefore imperative that the approach to formal consultation and community engagement is extremely robust and highly effective to ensure that the full range of views of people living and working in the area are adequately heard.

Given the impact of the pandemic and GAL's pausing of the NRP throughout much of 2020, the Council and other Gatwick local authorities have had the opportunity to provide feedback on the draft SoCC on a number of occasions as set out in Appendix 1 of this response.

The Council has consistently provided feedback highlighting a number of recommendations that the Council considers would improve the effectiveness of the consultation. Whilst a small number of minor changes have been incorporated in the latest draft SoCC, the contents are principally the same as the version we responded to on 8 April 2021. This response highlighted that (with the exception of some alterations in light of the Covid pandemic) the SoCC did not incorporate many of the key suggestions the local authorities jointly raised in March 2020.

We consider that the advice the Gatwick local authorities jointly provided is relevant to consulting both 'ordinarily' (i.e. not in the unusual circumstances of a pandemic) and at this time in the current pandemic. **Therefore, we attach, in Appendix 2, Part 1 of the Council's previous response submitted on 24 March 2020 which is the joint local authorities' feedback. We would urge GAL to review this document again and incorporate our suggestions.**

We appreciate that community engagement and consultation processes may be subject to pandemic restrictions and may therefore be potentially different and more challenging. HDC acknowledges that the draft SoCC has been updated to reflect alternative methods of consultation than those proposed in the 2020 version of the draft SoCC. Nevertheless, there is still concern regarding the effectiveness of the proposed approach to consultation and the Council provides the following specific feedback on these aspects and issues relevant to Horsham District. These comments should be read in conjunction with the overarching feedback contained within Appendix 2.

The Approach to Consultation

We reiterate our concerns regarding the clarity of GAL's approach. As currently drafted - and as previously highlighted - the draft SoCC is considered to be too vague and lacking in detail, particularly the language (which is non-committal around some of the proposed activities) and the absence of specific dates, timings and locations of events. We understand from the meeting held with officers on 13 April 2021 that formal consultation, in accordance with Section 42 of the Planning Act 2008, is anticipated to take place in early September 2021. Given the scale of the proposals and the potential impacts on many different communities, we have consistently recommended that the period for consultation should be extended from eight weeks to 12 weeks.

The Council acknowledges that, in the updated draft SoCC, the period of consultation has been increased to a 'minimum of nine weeks', however we remain of the view that the consultation should be extended to the full 12 weeks as the Gatwick local authorities have requested. A 12 week period of consultation is considered particularly important, given the current lack of detailed and up-to-date information on the NRP proposals that have been shared with the local authorities. It is considered that a limited period of consultation will affect the Council's ability to adequately assess the proposals, liaise internally and respond through the usual council processes within the current timeframe of nine weeks. We understand that Topic Working Groups are proposed to be arranged over the summer to share information with the host and neighbouring authorities, but at the time of writing this response, we do not have any information or intended dates.

Further to the meeting held with local authority Leaders and Chief Executives on 15 January 2021, GAL advised that formal consultation would take place in August/September later in the year. In its informal response on 8 April 2021, the Council raised concern that the consultation should not start in August highlighting that this would not provide sufficient opportunities for stakeholders to respond given that August is traditionally a holiday month which will see people travelling outside of the local area, where they normally live or work, to holiday or visit family – potentially more so than normal, given the prolonged period of lockdown the nation has endured. In the meeting with officers on 13 April 2021 GAL confirmed that it did not intend to start the consultation until early September 2021. This is welcomed by officers.

Alternative Public Consultation Measures in Light of Covid-19

As proposed, the Council is concerned that the level of public engagement may not be sufficient to achieve an effective consultation that would satisfy the requirements of the Planning Act 2008. Further detailed comments are set out in the following paragraphs, but in summary the detail in the SoCC should be more precise and set out a clear framework for consultation with contingency measures thoughtfully considered if the impacts of the pandemic interrupt the anticipated consultation programme.

Consultation Methods

In our previous response the local authorities jointly expressed concern at the lack of detail regarding the timings and locations of exhibitions. We acknowledge that GAL has now chosen

to explore other Covid-safe options which include telephone surgeries, a Mobile Project Office (MPO), virtual presentations and interactive virtual exhibitions. These alternative formats are welcome solutions in seeking community engagement under the challenging circumstances of the pandemic and in light of the potential for new strains to mean that restrictions are tightened again. It is also considered that a much greater level of flexibility and contingency needs to be built in to the SoCC. If proposed events cannot take place or are delayed or it is not possible to undertake some of the measures currently set out, what alternative strategies will be taken?

Whilst we appreciate the alternative solutions that GAL has included in the draft SoCC, such as the MPO visits, the Council considers that the exclusion of any staffed / community events as a means of engagement should be reviewed. The Council is mindful that, with the Government's roadmap out of lockdown and the swift rollout of the vaccine, by September, when GAL intends to consult, more mixing and public events are expected to take place, albeit with Covid measures in place. It should also be noted that not all exhibitions have to be staffed and can be unmanned, making publications and information available to the public, for example, exhibition banners in empty retail units in towns and villages which would help raise public awareness of the proposals and the consultation.

We note in paragraph 5.3.4 that it is suggested that consultation documents will be placed in two public buildings in each of the ten host/neighbouring local authorities. We therefore recommend making contact with West Sussex County Council to explore making copies available within Horsham and Billingshurst libraries

Consultation Publicity

We are pleased to see that the Local Authority suggestion of publicising details of the consultation could be through local authority newsletters and publications, has been included as a possibility in paragraph 5.3.19. However, we are concerned that confirmed dates and timings for events have not been shared. To properly plan for such events, we assume that these dates will be known to GAL and we are unclear why they are not being shared with local authorities. If the dates are not known yet this is also concerning as the window for inclusion in some local authority publications may not allow enough time to properly publicise the consultation.

It is also expected that much greater detail should be provided on how GAL will publicise the consultation and identify which print and online media outlets GAL will use, preferably with issue dates/timings and details of coverage. Paragraph 57 of the MHCLG 'Guidance on the pre-application process' states that the "*Statement of Community Consultation should act as a framework for the community consultation generally, for example, setting out where details and dates of any events will be publicised.*" Without this information, it is very difficult to assess the effectiveness of the proposed community engagement and whether this is sufficient for engaging with Horsham District.

It is understood that the Outer Consultation Zone has been devised using the Gatwick Diamond area and that the focus for engagement has largely been focused on the Inner Consultation Zone which has been devised around the 51dB(A) Leq noise contours. Whilst we welcome the fact that the noise contours for 2029 have now been incorporated, rather than 2038, the Gatwick Diamond area does not cover the area where flight paths extend much further west, over West Sussex and in particular, Horsham District. There are some areas outside of this consultation zone that are as, or potentially more, affected than some areas within it, particularly when considering overflight and other potential impacts as a result of the DCO.

In addition, the selection of the Inner Consultation Zone using the 51dB(A) Leq noise contours does not take into account the changes that may take place as a result of the FASI-South Airspace Modernisation programme. We are concerned that the airspace changes that may

take place as part of FASI-South may mean that there are people with the potential to be affected by the NRP who are not currently within the Inner Consultation Zone. Whilst the outcome of this programme is not yet known and will not be for some time, the possible impacts of FASI-South together with the growth that is proposed to take place as a result of the NRP, do need to be considered. Therefore, it is important to expand the Inner and Outer Consultation Zones to ensure that all residents that could potentially be affected by all future growth scenarios associated with the airport have the opportunity to participate fully in the consultation.

The Council considers that fair and equitable consultation can only be achieved by extending this consultation area to include areas of overflight, rather than focusing solely on the Gatwick Diamond area.

Locations for the Mobile Project Office

We are pleased to see that our suggested inclusion of Billingshurst has been incorporated as an MPO location, alongside another event to be held in Horsham. However, we note that the MPO locations will be publicised in a newsletter that is circulated to all homes and businesses that fall within the Inner Consultation Zone. The Council does not consider that this will adequately capture all the people potentially affected by the proposals. For example, residents in Slinfold, who have increasingly complained of the negative effects of overflight, fall outside of this zone. Both Horsham and Billingshurst are also outside the Inner Consultation Zone, therefore we are unclear how affected residents in Horsham District interested in attending the MPO would be made aware of such visits. This needs to be clearly set out in the SoCC and adequately publicised in due course.

The Council has been asked to recommend the most appropriate locations for the MPO visits in Horsham and Billingshurst. For Horsham town we would recommend the Carfax. To organise such a visit you would need an activity permit. The Council's website contains a [guide to organising outdoor events in Horsham](#), which may be of assistance. If you are interested in holding any events in Swan Walk shopping centre, we would recommend contacting the Swan Walk Management team.

Regarding the best location in Billingshurst, we recommend contacting Billingshurst Parish Council who will be able to advise the most appropriate location and the procedure for booking an event. However, the Council has held consultation events at the Billingshurst Centre in the past and found that this venue is accessible to local residents.

As it is currently proposed, a single visit to Horsham and to Billingshurst is considered insufficient and we would urge GAL to consider offering some additional MPO visits in the same locations and/or in locations in the north of the District, such as Rusper, Warnham, Colgate, Slinfold and Rudgwick, where airport activity has a greater impact on residents than in some other parts of the District.

Modernising of Airspace – Additional Paragraph 3.1.5

In our previous joint response (Appendix 1) we highlighted that communities may want to discuss the airspace change implications of the Government's airspace modernisation programme, known as FASI-South and also Route 4 during the public consultation. We also recommended that the interlinkages with the airspace change process need to be clear. This is supported by the Scoping Opinion provided by the Planning Inspectorate in October 2019, it was confirmed that "*the Inspectorate does not consider that the Airspace Change Process is, in itself, an aspect or matter that can be scoped out from the Environmental Statement*", thereby confirming that there exists a relationship between the two.

We note from the updated draft SoCC that a new paragraph 3.1.5 has been included and highlights that this consultation does not cover airport regulation and economic licensing and the modernising of airspace. Whilst we acknowledge that it is not GAL's role to conduct specific

consultation on the modernising of airspace as part of the NRP SoCC, this subject should not be precluded from discussions and the interlinkages should be made clear as the joint local authorities originally requested.

Consulting Local Communities and Hard-to-Reach Audiences

The Council's Statement of Community Involvement, which we have previously referred you to, sets out the steps we take as an authority and is available to view on our website: <https://www.horsham.gov.uk/planning/planning-policy/statement-of-community-involvement>.

We have already provided you with details of all the parish and neighbourhood councils in the District and all the organisations and interests groups that have engaged with the Local Plan process in recent years which should also act as a useful starting point for engaging with stakeholders in the District.

During the meeting on 13 April 2021, it was requested that it would be useful if local authorities could provide details of hard-to-reach groups in their authority areas.

Unfortunately, a number of these groups within the District are managed by members of the public and therefore, it would not be possible for us to share details, owing to GDPR requirements. A key hard to reach group in Horsham District is the Gypsy and Traveller community. This community has the potential to be particularly impacted by noise generated by changes in and around the airport. Whilst we cannot provide direct contact details, the following charity may be able to assist in publicising your consultation events <https://www.gypsy-traveller.org/>.

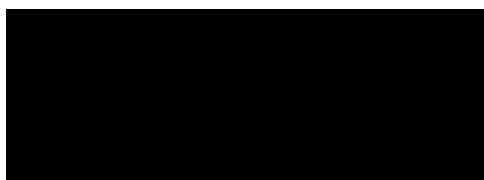
The Council suggests that consideration should be given to how GAL will engage with Horsham District and recommend that the SoCC is expanded to provide more detail on what it considers to be 'hard-to-reach' groups and what measures will be taken by GAL to engage these groups.

Conclusion

We very much hope that the advice contained in this response (which includes the joint local authorities' response issued on 24 March 2020) will lead to a revised Statement of Community Consultation that will be shared with the 10 host and neighbouring local authorities before formal consultation takes place. We would additionally request that we receive feedback on the comments raised.

Thank you once again for the opportunity to provide our comments.

Yours sincerely



Barbara Childs

Director of Place
Horsham District Council

Appendix 1: SoCC engagement timeline

| Date of Engagement | Action |
|--------------------|--|
| 20 November 2019 | Informal comments provided by email |
| 21 February 2020 | Marked the start of the 28-day formal consultation |
| 24 March 2020 | The Council issued its formal response formed of two parts: a joint local authorities response (Part 1) and comments specific to Horsham District (Part 2) |
| 25 March 2020 | The Council receive an email advising that GAL is pausing the NRP, owing to the impact and uncertainty of the pandemic |
| 21 December 2020 | Gatwick local authority Leaders and Chief Executives receive notification of GAL's intent to re-start the NRP with a virtual meeting scheduled for 15 January 2021 |
| 26 March 2021 | The Council receive details of GAL's revised draft SoCC |
| 8 April 2021 | The Council provide an informal response |
| 13 April 2021 | Informal meeting for the Gatwick local authorities to share informal feedback on the draft SoCC direct with GAL |
| 23 April 2021 | Additional comments provided by Horsham District Council to GAL as a result of actions agreed at the meeting. Other local authorities were invited to do the same |
| 4 May 2021 | Notification of the formal 28-day consultation on the draft SoCC received by the Council |

APPENDIX 2: March 2020 Response to the Draft SoCC

Gatwick Airport Development Consent Order (DCO) Local Authorities' Joint (Part 1) Response to GAL, re Draft Statement of Community Consultation (SoCC)

Thank you for consulting the Gatwick Airport Local Authorities on GAL's Draft Statement of Community Consultation (SoCC) for the Northern Runway DCO, in line with the requirements of s47 of the Planning Act 2008.

The response below is in two parts; Part 1 is provided on behalf of the Gatwick Local Authorities and sets out joint feedback on behalf of the Local Authorities. Part 2 details specific issues identified in relation to our respective administrative areas.

For clarity, the joint response is submitted on behalf of the following Gatwick Local Authorities:

| | |
|-----------------------------|------------------------------------|
| Crawley Borough Council | Reigate & Banstead Borough Council |
| Horsham District Council | Mole Valley District Council |
| Mid Sussex District Council | Tandridge District Council |
| East Sussex County Council | Surrey County Council |
| West Sussex County Council | Kent County Council |

PART ONE: GATWICK LOCAL AUTHORITY JOINT RESPONSE

1. INTRODUCTION

Having reviewed and considered the draft SoCC, the Gatwick Airport Local Authorities are of the view that the document is too vague and open to interpretation. As currently drafted, we consider that the SoCC would not produce an effective consultation that would satisfy the Planning Act 2008, PINS Advice Notes and DCLG Guidance: Guidance on the pre-applications process. There are still a number of gaps within the draft SoCC including timescales for consultation and locations and times of exhibitions, which make it difficult to fully respond and understand in full the potential implications. This lack of clarity is a concern.

We would note that PINS Advice Note Two states that "*Some local authorities work collaboratively with a developer to prepare the SoCC in an iterative way and this is encouraged.*" Accordingly, it is best practice for a developer to issue a draft of the SoCC to the relevant local authorities for comment so that the developer can incorporate those comments prior to consulting on the SoCC formally under section 47 of the Planning Act 2008. It is disappointing that you have chosen not to follow this approach, and instead we have been presented with the draft SoCC for the first time formally under Section 47. In light of this, we would recommend that GAL updates the SoCC with our comments and then consult the Gatwick Airport Local Authorities again once a revised SoCC is available which has taken into account our comments presented here.

The Gatwick Airport Local Authorities are also concerned that uncertainty as to how and when GAL intends to engage could result in an insufficient level of resources being designated to public consultation and engagement, meaning that the views of people living and working in the area are not adequately heard.

In addition, we think that the document should be clearer and more descriptive with regard to the project itself and the planning process surrounding it.

In terms of specific comments on section 1 of the SoCC, it would be helpful if the SoCC could provide a better summary of the proposed development, and the DCO process itself, in order to assist users in understanding what they are being consulted upon and how they can feed into this process. This includes the following points;

- To assist in providing a clearer understanding of the DCO project, the SoCC should mention (1.1.4) the restrictive planning condition which still needs to be lifted, not just the expired legal agreement. Paragraphs 1.1.4 (and 3.1.2) suggest 61mppa can be achieved “based on existing facilities”, but the Scoping Report suggests there are additional projects required to achieve this. For clarity, this could be amended to read “based on the use of the existing main runway”
- Further, we recommend that the local authorities that have been consulted are listed in paragraph 1.1.8 and that it is confirmed that their comments have been taken into account in producing the final draft of the SoCC.

2. OVERVIEW OF THE PROCESS

Additional information around the DCO process should also be added, in order to make clear the roles that GAL, the Planning Inspectorate, respondents and other stakeholders will play in each of the stages already outlined. In particular it would be useful if guidance could be provided to explain who the stakeholders are, ideally before Diagram 2.1.1, which itself could include less jargon and provide more information to explain the DCO process. Many people will not know what the words in this section mean. Although some information is set out in Section 4, we consider it forms part of the ‘overview’ of the process. We suggest, as a minimum amending Diagram 2.1.1 as follows:

- the pre-application section is confused. We suggest that 'where required' is deleted as an EIA is needed as GAL has confirmed in its Scoping Report. Further, the text in brackets needs to be reconsidered as it is not clear what it means;
- The diagram does not explain that GAL must submit the DCO to the Planning Inspectorate for independent examination, and this should be added.

The document currently provides inadequate information about the legal requirement to consult and an explanation of the provisions of the Planning Act 2008 and the associated DCLG Guidance and PINS Advice Notes. The Gatwick Airport Local Authorities recommend that this important contextual information is provided so as to assist people in viewing and reading about the process and how they can take part.

3. THE NORTHERN RUNWAY PROJECT PROPOSALS

As a general point, it would be helpful if the SoCC could provide a better summary of the works proposed through the DCO, and the DCO process itself in order to assist users in understanding what they are being consulted upon and how they can feed into this process.

We note that the first bullet point of 3.1.1 does not make sense, and we suggest re-wording to read ‘All arrivals to continue to use the existing main runway’ instead. Paragraph 3.1.4 should include reference to ‘relocation and expansion of energy-from-waste facility’.

The description of the proposed development is too brief and is not clear as to where all the elements listed in paragraph 3.1.4 are proposed to be located. For example (and the below is just a selection):

- where are the hotels and offices to be located?
- how much hotel and office floorspace are proposed (in order to carry out the PEI GAL must be assessing a maximum floorspace)?
- where are the surface access improvements to be located?
- what do the surface access improvements involve and to which modes of transport?

The SoCC should include a Site Plan showing where the elements identified in paragraph 3.1.4 are to be located. In addition, the SoCC should describe whether there are any temporary works required for the project and, if so, what they comprise.

It would also assist to confirm what the consenting strategy is for each part of the project - whether you will be consenting all elements within the DCO application and whether any compulsory acquisition powers will be sought.

On a related note, communities may want to discuss the airspace change implications of the Government's airspace modernisation programme, known as FASI-South, and also Route 4 during the public consultation. Therefore, the interlinkages with the airspace change process need to be clear. In addition, full and clearly presented information on aspects such as the temporary impact of construction and sequencing of scheme delivery will be required during the public consultation.

4. ENVIRONMENTAL INFORMATION

The Gatwick Airport Local Authorities have no comments on this section.

5. CONSULTATION

5.1 Our Approach

The key objectives should be supplemented by explaining the purpose of the consultation. Further in paragraph 5.1.1 the objectives appear quite negative. In the third bullet point why are only 'sufficient' opportunities being provided? In the fifth bullet point we suggest GAL should be adopting an approach where it not only meets but also exceeds the requirements of the Planning Act 2008.

It is stated that the consultation will take place over a minimum of eight weeks (5.13), but there is no information given as to the specific dates when this will take place. As it stands, the proposed eight week period will significantly restrict the authorities' ability to fully engage Members in the process. Furthermore, such a short consultation period provides significant doubt as to whether authorities would be able to respond in a timely manner, owing to the need for any response to be approved through the relevant internal decision-making processes.

Formal consultation should be for at least 12 weeks (not eight), to allow for local authority internal governance (i.e. officer review and preparation of report to members and member sign-off), and for members of the public to be given enough time to fully engage in the process. As much advance notification as possible should be provided of when the consultation is to commence.

GAL should also note that authorities' decision-making processes are restricted during pre-election periods. Consulting through any pre-election period would further impair authorities' ability to respond.

The consultation period should exclude August, as this is the school holidays and there are unlikely to be cabinet/committee meetings for officers to get the necessary sign-off of decisions. This is a month when members of the community are on holiday and so would be less likely to be able to attend.

Authorities seek assurance that GAL would delay / extend their consultation period should Public Health advice regarding Covid-19 suggest public gatherings /meetings should not take place.

As explained above, unless details are provided of when the consultation is taking place, and for how long, then it is impossible for the Gatwick Airport Local Authorities to respond properly on this consultation. This information must be provided and consulted upon. Reference is also made to 'further stages' of consultation. It should be explained under what circumstances this would happen.

In respect of paragraphs 5.1.4 and 5.1.5 it would be helpful if the SoCC explained how this consultation will be undertaken.

5.2 Who we will consult?

The section on who will be consulted is considered too vague. There is no real attempt to define who will be consulted. A statement that 'anyone with an interest in the Project who considers they may be directly, or indirectly impacted' is insufficient. This is supplemented to say 'anyone who lives, works or otherwise use the areas closest to Gatwick.' Again this is considered inadequate. Unless GAL defines who they are consulting it is difficult to see how it will ensure all groups are consulted. The document needs to take a much more holistic view in explaining who GAL will be consulting.

Although not exclusive it is considered that the SoCC needs to identify business groups, community services, parish Councils and resident groups that it will consult - we would expect the SoCC to identify these, rather than contain vague phrases.

Inner and outer zones

It would assist if the plan which shows the map of inner and outer consultation zones was larger and clearer, and if the Gatwick Airport Local Authority boundaries could be layered onto it. Information quantifying the number of residents and businesses proposed to be consulted in each zone should be provided in Paragraph 5.2.4.

The definition of consultation zones seems to pre-suppose that noise will be the principal issue. Whilst we consider that noise is a significant issue, there are other issues that have the potential to impact on the residents, stakeholders and the environment outside the noise contours including surface access, aircraft overflight, associated development concerns and other potentially significant environmental effects such as visual impact and air quality.

The inner consultation zone should therefore be extended to at least also include areas where there may be adverse traffic impacts and/or improvement works; areas within the identified visual zone of influence; and areas identified as potentially impacted by air quality within the EIA Scoping Report.

In any event the inner consultation zone as presently broadly shaped around the 51 dB(A) Leq noise contour in 2038 is considered to be inappropriate. The inner consultation zone should instead include all households that would fall within the 51 dB(A) Leq noise contour of the year that the northern runway operations commence, and not the 2038 contour. This would ensure that all those residents likely to be affected by aircraft noise associated with the proposed development would be fully informed of this consultation. By using the 2038 contour, GAL

seriously risk ineffective consultation by failing to actively notify those households that will be immediately impacted by use of the northern runway upon opening, that do likely not fall in the 2038 contour or within the 51 dB(A) Leq contour today under single runway operations.

Furthermore, where part of a settlement falls within the suggested contour that will inform the inner consultation zone, all households in that settlement should be treated as within the inner zone and should therefore be sent the same information. It is also important to note that GAL cannot be certain that there will not be people affected by a change in noise climate outside of the 51dB contour. Indeed, aircraft may still be below 4,000ft beyond this contour and these areas, where there is potential for likely significant noise effects, should also be included in the inner consultation zone.

We note that the wider outer consultation zone has been defined to include the Gatwick Diamond (GD) regional economic area. The Gatwick Diamond (GD) is a regional economic area; it is quite obvious that is not a perfect fit when it comes to consulting on a proposal with such a wide range of environmental impacts as the project and which potentially affects residents and businesses within a wide geographic area. We therefore consider that the outer consultation zone should be further extended in a number of different areas so that it includes areas which could be subjected to increased overflight as a result of the project. These will be detailed in individual local authority responses.

We believe that there is also a need for some additional exhibitions to take place outside of the GD boundary. With this in mind we suggest that the GD area is used on an indicative basis with a soft boundary, and that in instances where there is a justified need, exhibition events take place outside of the GD area. These will also be detailed in individual local authority responses.

The details in paragraph 5.2.3 which explains how consultation will be undertaken in both the inner and outer consultation zones is inadequate. Far more detail is needed here with firm commitments to consultation which can then be measured.

Hard-to-reach groups

There should be more detail provided on what GAL consider to be 'hard-to-reach' groups and the groups actually identified in the SoCC. It should be made clearer how 'hard-to-reach' groups will be targeted – who they are, how they will be made aware of the project, and how they will be helped to provide feedback. Detailed lists of specific organisations are provided in individual local authority responses detailed in Part 2 of this response.

The draft SoCC contains references to events that 'may' be organised or activities that 'could include', but it is not clear what GAL is committing to or not, as the case may be, and therefore it is difficult for the local authorities to assess the adequacy of the proposed consultation. We would expect to see reference given to the Equality Impact Assessment (EqIA) that GAL has carried out to make clear how this has been used to inform the format of the consultation process.

We would also expect to see a section included within the final SoCC which summarises the measures undertaken to ensure that the consultation is accessible to all. This should include making the website and documents accessible to people using audio transcription software and making Easy Read versions and different language versions of all documents available upon request. Venues for the exhibitions should also be accessible to the visually, and mobility impaired and those with prams.

It would also be helpful if the SoCC could consider whether there are parts of the local community that may be disproportionately affected (see paragraph 5.3 of PINS Advice Note 2).

5.3 How we will consult

In section 5.3.1, details of document deposit points (such as the number and location) have not been provided so we are unable to comment on whether they are sufficient and suitable. These should be included in the final SoCC and, prior to the finalisation of this list, the local authorities should have the opportunity to formally comment on the list proposed.

There are some members of the community who do not have access to the internet and it is therefore very important that there are enough Document Inspection Locations to ensure that everyone who wishes to view the documents is able to do so. It is vital that GAL's engagement is as accessible as possible, and consultation information should be widely available at a range of publicly accessible locations during the consultation. Libraries as well as Council Offices can be an easily accessible location and suggestions are therefore included in Part Two of each authority's response.

In addition, no details have been provided regarding how long the information would be available for. We suggest the information should remain at the deposit points until the DCO application is submitted, at which point it could be replaced with the final documentation. We note that it is somewhat unclear (5.3.1) as to what the difference is between the 'consultation summary document' and the 'consultation overview document'. It would be useful if this could be clarified.

The fee for participants to request information (5.3.2) is very high at £500, meaning that only people with surplus income may be able to request this. Whilst it is understood that there needs to be a fee to discourage unnecessary printing, setting it at £500 may genuinely bar some from fully engaging with the consultation. We would like this to be reviewed, as this seems unreasonable.

In addition, all 'Host' and Neighbouring authorities should receive a full printed set of the consultation documents upon request.

With regards to paragraph 5.3.7: the newsletter should include details of how people can engage with the process online. This should include links to where information can be found, and how they can sign up to be kept up to date electronically throughout the process. The SoCC should also include details of how personal information is to be protected, including what will be collected and how it will be used. A privacy notice might be the most appropriate method for this.

We consider that residents and businesses should have the opportunity to engage with all pre-submission evidence base materials – the SoCC as currently worded focuses predominantly on the PEIR consultation.

Exhibitions and events

The Gatwick Airport Local Authorities are varied in terms of their demographics and character, and in order to ensure that GAL's engagement is sufficiently inclusive to capture representative views, there is a need to ensure that engagement approaches, including the advertising of events, and the location and timing of these events, reflects the varied population and local circumstances of our areas.

The lack of the clarity and information in the draft SoCC regarding the specific locations, dates and times of exhibitions is a significant concern and prevents the councils considering whether the consultation will be adequate. If this information was not available when the SoCC was sent to the Gatwick Airport Local Authorities then the consultation should have been delayed. This information is expected to be detailed in the draft SoCC to enable meaningful comments on

each. We therefore consider that there should be a further formal consultation providing this level of detail.

GAL has stated in the draft SoCC that it will hold 17 consultation exhibitions. We are concerned that this number of proposed events is insufficient. During consultation on Local Plans local authorities typically hold multiple events in much smaller geographical areas than GAL is proposing. Given the potential impact of these proposals on such a large number of people in a wide geographical area, we strongly recommend that more events are programmed to enable members of the public and other stakeholders the opportunity to understand the proposals in more detail.

The limited number of events and the distance between them strongly suggest that it is assumed that an individual will be able to attend their local event on whatever date and time it is held. This is not realistic. Also, there should be more than one exhibition in the Inner-Zone areas most significantly impacted by the project to ensure those working shifts and with other limitations can have a greater opportunity to attend.

Several Local Authorities have already asked for a number of additional specific locations for exhibitions, as part of the informal consultation during December 2019. These will be included in individual responses. We therefore ask that GAL revisits these recommendations and adds them to the existing list of exhibition locations.

As a useful comparison, we have also had regard to the Statement of Community Consultation publicised by Heathrow Airport Limited (HAL) for the third runway DCO. In terms of capacity, both the Heathrow third runway proposals and Gatwick's expansion proposals will increase the passenger throughput by over 50% for both airports (based on the capacity generated by Scenarios 1 and 2 in the Gatwick Airport Masterplan). It is therefore considered that the number of events for Gatwick expansion should be much higher and similar to the number of public exhibitions that HAL proposed (43).

It is noted that p.10 of the Draft Statement of Community Consultation (SoCC) contains the proposed general locations for consultation exhibitions, however it does not contain the dates and times for these events and it is our understanding that GAL will not be providing this information to the local authorities before the publication of the SoCC. It is therefore not possible for the local authorities to fully assess if these events will provide adequate opportunities for members of the public to easily access an exhibition event.

We consider this to unacceptable, and it is vital that specific locations are identified in liaison with the relevant local Authorities and that further consultation is undertaken on the proposed list.

With regard to the type of events undertaken, it is considered that the SoCC needs to present the balance between community and shopping centre events, not least as it cannot be certain that the latter allow for proper engagement with experts to discuss the proposal and may be aimed simply at collecting numerical support for the proposals. There should be some flexibility in the type of consultation event held to enable GAL to be able to respond to outcomes of the evidence base that is currently being prepared. For example the full extent of the surface access and environmental impacts are not yet fully understood. There may be a need to hold more focussed community events in areas particularly impacted from something that is currently unknown, and this should be set out in the SoCC.

The current status of times for exhibitions within the draft SoCC as 'tbc' suggests there is no guarantee that the exhibition would be over a time period which would give as many people as possible the opportunity to attend. We strongly suggest that the timings enable members of the public to access the events during the day, evening and weekends, accounting for the working

population, commuting times and any other constraints members of the public may experience. We recommend 2pm – 8pm on a weekday and 10am – 4pm on Saturdays. Again, we would urge GAL to work with the Local Authorities to identify the most appropriate times to ensure that events are accessible and inclusive for as many people as possible.

Additionally, there is no indication that there will be any unmanned exhibitions in public areas which would enable those without internet access to view the consultation information and complete paper surveys. We recommend this is included.

Additional consultation and engagement activities

In the section on Presentations and other events (5.3.10 – 5.3.15), the draft SoCC is too vague in respect of whether other activities may be carried out. The document states; ‘other events may be carried out, if considered necessary and appropriate’ and ‘Additional events may be organised if necessary’. There is no information given as to how people make requests, who would be making the decision as to whether something is deemed ‘necessary’ and ‘appropriate’ and how GAL will engage with local authorities and residents to decide this. We think this information should be included within the final SoCC.

Paragraph 5.3.10 of the draft SoCC states that GAL will “seek to accommodate reasonable requests for presentations and briefings. However, there is concern that this statement is not measurable, nor will it commit GAL to undertaking a certain number of presentations/events with the stakeholders highlighted. To meet the objective set out in 5.3.10 it is suggested that GAL could record the details of the requests from these stakeholders and make them publicly available (or, as a minimum, share the requests with the local authorities) and provide details of which requests have been met with a presentation or briefing as suggested.

The draft SoCC provides little detail in regards to the Project Freephone Hotline and what the relevant dates and timings will be for this service (e.g. will it just be 9am-5pm Monday – Friday?). Further details should be included in the final SoCC.

Paragraph 5.3.14 mentions that unstaffed exhibitions “may be organised if necessary”. These should be identified in the draft SoCC in order for authorities to be able to meaningfully comment on the proposals. They would need to be organised and publicised to the public from the outset as such events are important in enabling those people without internet access to view consultation materials at a range of times and places. Such individuals may wish to complete paper surveys and so a freepost address should be provided for all written responses. This is referred to in relation to the public exhibitions but is unclear whether this applies more generally for those providing written responses.

GAL should also list in the SoCC the other publicity events such as ‘pop up’ events that were discussed in the TWG. These can play an important part of the consultation and not listing them impedes the local authorities’ ability to meaningfully comment on proposals.

We advise that GAL contacts parish councils, resident groups and groups of interest within the inner and outer zones directly about the consultation. Also, there are certain groups that are organised and already engaged with GAL’s expansion plans, and would provide GAL with the opportunity for targeted and specific consultation.

It must be ensured that adequate advance notice is given for the exhibitions when it comes to announcing the times and dates of exhibition events. This should be at least four weeks prior to the first exhibition and this commitment should be stated within the final SoCC.

We would also like to see a commitment within the final SoCC to provide local authorities with a schedule of social media posts prior to consultation

General comments on promotion and publicity

The SoCC should specify publicity initiatives that GAL will undertake, as the caveat 'where appropriate' is considered non-committal and therefore makes commenting meaningfully difficult at this stage.

The SoCC states that the Newsletter, which is the only document being sent directly to residents and businesses, is only to be distributed within the Inner Consultation Zone. As set out above, this is not considered to accurately identify all those who will be significantly affected by the proposals. Each authority will identify additional areas they consider should receive this direct mailing.

Paragraph 5.2.8 refers to bespoke presentations, but the local authorities would like to know how people will be made aware that these are available, what sort of publications might be targeted, and how will those who cannot travel be reached?

Specific details of publicity should have been provided in the draft SoCC in order for local authorities to be able to comment on whether outlets are appropriate and would give sufficient coverage. Details have not been provided of where and how the consultation on the scheme would be advertised to accord with the Planning Act, so we are unable to comment on whether this would help to cover off some of our concerns over publicity. We therefore consider that there is a need for further formal consultation on proposed dates, timings and locations of proposed promotion and publicity.

GAL should ensure that all information submitted during the consultation period is shared with the Gatwick Airport Local Authorities, via on a web based portal to ensure authorities can engage thoroughly in a timely manner.

6. CONCLUSION

The above sets out the collective feedback of the Gatwick Airport Local Authorities on the SoCC and the proposed consultation approaches set out within it. To reiterate,

- For Council elected Members to be properly and effectively engaged during the statutory consultation process the consultation period must be extended to 12 weeks.
- The consultation undertaken by GAL should enable as many people as possible to engage in the process.
- To be effective, engagement will need to be inclusive and accessible.
- A range of different events, including unmanned exhibitions, at appropriate locations and times is required.

Our concern is that the draft SoCC, in its current form does not achieve this; and we would urge GAL to work positively with each of the Gatwick Airport Local Authorities to maximise the opportunity for people to participate in this consultation using the most locally appropriate engagement approaches. We would like to request that we receive feedback on the comments raised above, and to be consulted on a further version of the SoCC.

Lydia Grainger
Planning Manager, Gatwick Airport Ltd
Northern Runway Project

Email:
Strategic.Planning@horsham.gov.uk

By email: [REDACTED]@gatwickairport.com

16 May 2022

Dear Lydia,

Re Northern Runway Project: Further Consultation (June 2022)

Thank you for the opportunity to respond to GAL's draft proposed approach to further public consultation on the Gatwick Northern Runway Project.

Following the 12-week statutory consultation that was undertaken by GAL in autumn 2021, it is understood that GAL is proposing to undertake a targeted statutory consultation on the updated highways proposals for 28 days beginning in June 2022. It is further understood that GAL will also be publishing details of the refined project proposals to seek informal feedback before finalising the DCO application.

The Council's feedback on the proposed draft approach to consultation is set out below.

The Proposals and Further Consultation

For local authorities to provide comments on GAL's approach to Further Consultation, GAL shared a "*Draft proposed approach for local authority feedback (June 2022)*" document. As detailed in paragraph 1.1.3. it is understood that the Further Consultation will present an opportunity to share "*the updated aspects of the design of the highways works and refined proposals for the project in some other areas*".

The Council considers that the exact details of what will be contained within the Further Consultation is vague at this stage and this makes it difficult to provide our feedback in detail. It would have been helpful for the local authorities to have been given access to the consultation material ahead of publication; both to provide targeted commentary to GAL on the approach to consultation, but also to help manage the resourcing of officer time to respond to the consultation itself, which runs concurrently alongside the intensive Topic Working Group schedule. It is understood from the Topic Working Groups that further work across the PEIR chapter topics is being undertaken to support preparation of the Environmental Statement and the Council is keen to understand the volume and contents of consultation material in this respect.

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Further to this, the Council questions whether the refined project proposals, which are currently only proposed to be subject to non-statutory consultation, should in fact form part of a wider Statutory Consultation. We understand key matters, such as the new car parking strategy, revised locations for office and hotel provision, new flood alleviation schemes, the chosen location of the CARE facility and biodiversity will form part of the refined project proposals for consultation, but these are significant matters.

It is understood from the draft proposed approach that GAL is generally focusing consultation activity on the area most likely to be affected by the updated highways proposals (*Figure 2.1 Highways consultation area*). There is concern that a focus for targeted engagement activity principally on this area could preclude any residents, businesses and other stakeholders affected by the changes to the other project proposals, which as we have identified, constitute key matters and represent significant development in their own right. Further to this, traffic generation may have a much wider impact than just noise impacts singularly, and this approach may fail to capture the impacts and responses from a wider area. Distribution of the newsletter to the Highways consultation area (as detailed in paragraph 2.3.1.) again, may not adequately capture all those affected.

It is vital that there is transparency to this process if the best outcomes are to be achieved. Therefore, GAL should be explaining the rationale and justification for any amendments made to plans and publishing the evidence (including that missing at the last round of consultation) that underpins its refined approach. It is also currently unclear whether GAL will be undertaking further focused consultation to address other technical matters outstanding from the first consultation, including employment land requirements, noise and recently revised WHO carbon values.

Approach to Consultation

In section 2.3 of the draft proposed approach GAL has stated that *“following the success of our [GAL’s] virtual-only consultation in 2021, we [GAL] intend to use the same approach in June 2022”* which will mean that no public-facing events are again proposed for this Further Consultation. In the first instance, the Council queries on what measurable basis GAL has concluded that the virtual-only consultation was a success.

As GAL is aware, we raised concerns with the approach to Statutory Consultation in the Council’s formal response to the Statement of Community Consultation, particularly around the disbenefits of a virtual-only approach and the lack of public-facing events. We are concerned that this has excluded some members of the public, who might otherwise have been interested in commenting on the proposals, from inputting into the consultation. We remain of the view that public awareness of the consultation has been lessened due to the lack of face-to-face engagement and consider that a virtual-only Further Consultation carries the same risk.

The Council also queries the justification for not choosing to hold face-to-face engagement at the current time. Following the Covid pandemic, the Government has now removed all

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remaining domestic restrictions in England and there are no limits on any form of contact or public meetings. The Council therefore considers that a more robust approach to Further Consultation will be to include some exhibition events.

Additionally, the Council would like to recommend that a more innovative approach is undertaken to the contents of some of the consultation material. The sheer volume and type of information that was shared as part of the Statutory Consultation was difficult to quickly understand the proposals without a deep dive across the many and varied technical reports and detailed figures. This upcoming consultation provides an opportunity to share more innovative publicity material such as videos, annotated aerial views, 3D images or infographics to help members of the public and stakeholders more readily understand the proposals, rather than standard plans and drawings.

Timing of the Consultation

In the first instance, the Council wishes to highlight that local authorities have only been given 9 working days to provide feedback on the proposed approach to consultation which we consider is insufficient. The Council has consistently highlighted the difficulties with GAL's timescales for officers to effectively respond to requests for feedback to the proposals. This is further compounded by the fact that officers are undertaking this work alongside their usual responsibilities.

There is also concern regarding the timing of the Further Consultation which is scheduled to begin in June 2022. As GAL will be aware, a number of officers from across the Council are currently engaged in a series of detailed Topic Working Groups to discuss local authority feedback on the proposals following the Statutory Consultation in autumn 2021.

GAL has issued an Engagement Protocol which sets out the terms of reference for engagement at the Topic Working Groups between GAL and the 10 local authorities most affected by the Northern Runway proposals. Following sub-division of two Topic Working Groups, there are now nine separate Topic Working Groups and it is anticipated that each of the meetings will have approximately three two-hour meetings over the course of May to July. As part of the proposals, officers engaged in the Groups will co-ordinate the respective local authority's response within 10 working days of each TWG meeting, along with reviewing material five days ahead of each meeting. This is generating a significant amount of work for officers. It should further be noted that the officers participating in this work are the same officers who will be preparing the Council's responses to the Further Consultation.

Once again, the Council would like to highlight the significant burden that this work is placing on local authorities, especially in the absence of sufficient funding to properly support this work. The Council considers that the engagement with local authorities and other Statutory Undertakers, which is taking place through May to July, would lead to refinement of the project proposals which would, in turn, lead to a scheme that may continue to be subject to further changes. Therefore, the Council raises concern regarding the appropriateness of holding a public consultation at the same time as the Topic Working Groups and considers that a Further Consultation may be more appropriately timed at the start of September.

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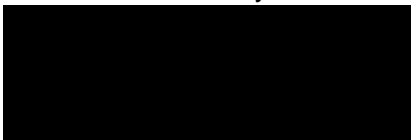
Further to this, there is significant concern regarding the 28 days currently proposed for consultation which the Council considers to be insufficient. As GAL will be aware from the Council's response to the Statutory Consultation, we raised significant concern with the 12-week period for consultation, particularly in light of the volume of consultation material that was subsequently published at the start of the Statutory Consultation (some 2,000+ pages). At the time of providing this response, officers have not had sight of the consultation documents that will be published as part of this Further Consultation, nor fully understand the extent of refinements to the project proposals and supporting evidence base, therefore it is difficult to recommend the most appropriate period for consultation. Nevertheless, the Council considers that 28 days is insufficient to allow members of the public and stakeholders to properly digest, interpret and respond to the updated highways scheme and the refined project proposals and therefore a minimum of 8 - 12 weeks should be allowed.

Additional Information to be Provided

| Section / Para | Information Required |
|-----------------------|---|
| 1.1.3. | List of Statutory Consultees to be confirmed |
| 2.2.1. | Please list / provide further detail on the 'Prescribed Persons' |
| 2.2.2. | Please provide details of the advertising campaign |
| 2.2.3. | With reference to how hard-to-reach audiences will be targeted, please specify channels |
| 2.3. | With reference to those who are directly affected by the highway design updates, please advise details so local authorities can judge scope and add as necessary |
| 2.3.3. | Please advise which public buildings |
| 2.3.5. | Please confirm dates when this service will be offered |
| 2.3.6. | The Council is unclear what constitutes 'reasonable', and we are doubtful whether a 28-day consultation period will adequately provide sufficient time to accommodate all such requests |
| 2.3.7. | Please advise which media channels |
| 2.3.9. | Please advise the telephone number |

We trust that this feedback is helpful. Thank you once again for the opportunity to provide our comments.

Yours sincerely



Barbara Childs
Director of Place