



Submissions on Adequacy of Consultation received during Pre-application and Acceptance

TR020005: Gatwick Airport Northern Runway Project

Number	Name	Date received
1	Stuart Spencer	12 January 2022
2	GATCOM	1 March 2022
3	GATCOM	9 March 2022
4	Gatwick Area Conservation Campaign (GACC)	15 March 2022
5	Communities Against Gatwick Noise and Emissions (CAGNE)	29 April 2022
6	Ten local authorities	26 May 2022
7	CAGNE	18 June 2022
8	Stephen Heald	30 July 2022
9	GACC	14 July 2023
10	Gateley Hamer on behalf of Surrey County Council	21 July 2023

Number: 1

Name: Stuart Spencer

Date received: 12 January 2022

From: stuart spencer [REDACTED]
Sent: 10 December 2021 10:59
To: SHAPPS, Grant [REDACTED] <[\[REDACTED\]@parliament.uk](mailto:[REDACTED]@parliament.uk)>
Subject: Response to runway consultation November 2021

Dear Secretary of State for Transport

This mail need to be treated as an official complaint about the Gatwick Northern runway consultation. My complaint is made in line with the Planning Inspectorate procedures ref [this webpage](#) for deficient and or misleading consultations.

I want to state that I believe the consultation is not transparent or fair and it does not conform to the Gunning Principles for public consultations.

From the above reference, The Gunning Principles for consultations state:-

"There (should be) sufficient information to give 'intelligent consideration' The information provided must relate to the consultation and must be available, accessible, and easily interpretable for consultees to provide an informed response."

The consultation does not have sufficient accessible/interpretable information to enable me to form an informed opinion.

I have raised my concerns in calls with GAL's noise and business experts during November 2021, and I have been responded to by saying this is a preliminary environmental assessment and that missing data will be supplied when the formal planning inspectorate application is made. This is not acceptable. This looks like an attempt to swerve the need for all info to be publicly presented and strengthens my view that the consultation is inadequate.

GAL's reply to the missing information is that people will be able to see it when it is presented as part of the formal planning application. But that will not be seen by the majority of the public, and by not presenting such information now, GAL will be receiving a more favourable response from the consultation, which of course will be reported by GAL to the planning inspectorate when the formal application is made. This manoeuvre gives the impression that GAL have deliberately restricted what is included in the consultation for the purpose of gaining a more favourable response. That is one of the reasons for my complaint.

I complain to you that GAL's procedural approach appears to use trickery to get planning approval. By using preliminary and outdated data it is quite likely that the outcome of the public consultation is more positive

than it would otherwise be. By submitting the outcome from the public consultation with the formal planning inspectorate application they are effectively then submitting a wrong application as it has not presented the public with:

- latest developments and research into climate change
- actual health effects of noise and pollution for people who live under or near the flight paths in an understandable way
- the negative effects on plants and wildlife and the world at large

The evidence for my complaint is detailed below centered on a lack of information for both Economic and noise information. Red text shows the conversation with GAL on calls. **Details of GALS response on 24.11.21 in green.**

Please register my **100% opposition** to the scheme and the inadequacy of the consultation.

Economic details :-

1. Your consultation docs quote research on passenger demand from 2012 and 2018 - all before climate change was declared as an emergency by the UK Gov. (ref [REDACTED]) So have passenger climate change attitudes been factored in to the published passenger demand forecasts? Recent polls suggest the public is in favour of more climate targeted taxes. (ref [REDACTED]) Have you done sensitivity modelling on that sentiment re demand forecasting? **The Answer given on the GAL call: No and no - reason given is you only have info of intent now. It was stated on the call that a higher case of passenger demand has been used so as to maximise noise impact assessments - but I pointed out that approach will lead to higher economic benefits. Eg We do not know by how much a 1% extra passenger demand inflates the economic benefits and environmental impacts. I believe not enough clarity on the methodology/assumptions has been given - and no sensitivity analysis done regarding likely hood or not of a bias towards higher economic benefits and climate change attitudes. This IMO needs addressing. This I 'think' was accepted on the call. Since my call, COP26 has further changed public perception of climate change and I would say this is an increasing large risk to the passenger demand figures shown in the consultation and associated economic benefits. Today Delta airways states that flying will have to cost more in the near future due to climate change - thats open and frank acceptance from the worlds largest airline that flying demand will have to deal with a higher price of flying - an aspect that has NOT been considered or discussed in the consultation docs. see below. So in summary I think the demand figures are stated without any risk assessment to**

those figures, whereas in reality there are significant risks that should be considered, but they are not. - [REDACTED]

[REDACTED] So I cannot come to a judgement on the scheme as I believe the passenger forecast figures do not show the affect of climate policies or sentiments.

2. In <https://www.gatwickairport.com/globalassets/company/future-plans/northern-runway/2021/eia.pdf> page 61 table 4.18 the net present value of impacts due to the scheme are listed. Where are the baseline values without the scheme, otherwise a comparison cannot be made. eg for the stated £3.5m increase in sleep disturbance, what is it currently as baseline? Without this I cannot say if £3.5m is a 10% increase or a 110% increase? Therefore how can I assess whether this is a tiny impact or major impact? I can't . On the call this was described as a fair point. and would be researched. I have had not subsequent reply from Gatwick - so I am left in a position unable to make a judgement on this issue of disbenefits.
3. The overall net benefit of the scheme does not seem to account for the wider environmental impact cost. The extra co2 emmissions will have a monetarised cost which is not shown at all. On the call it was stated that GAL have followed DfT requirements and guidance, but accepted that worldwide impacts of the increased flights (eg by CCC) is not accounted for outside of the UK. I remarked that there is no 'rule' that says GAL could not have addressed this issue more frankly in light of increased climate concerns. That point was accepted. Regardless of DfT guidance, I find I cannot form a view on the merits of this scheme because I am not informed about the impacts to the world I live in. This IMO is a key flaw in the transparency of the consultation. During the consultation COP26 took place. This has IMO changed the focus of the world. Every activity has to be viewed through a lens of the climate emergency and the 1.5deg increase target, rather than the 2.4degC we are gong to get. Because Gatwick has not been more transparent in telling the true cost of the aircraft emissions due to the scheme, I cannot come to an informed judgement.
4. Your forecasts assume and I quote 'R3 at Heathrow will not come forward'.
(ref <https://www.gatwickairport.com/globalassets/company/future-plans/northern-runway/2021/overview.pdf> 6.4.3 page 82. What does that statement mean? Do you mean Heathrow's runway will not be built sooner in time than planned, or not at all? In fact, on the call with GAL, it was stated the passenger forecasts for the GAL scheme are based on the assumption that the new Heathrow runway will **NOT** be built at all. <https://www.gatwickairport.com/globalassets/company/future-plans/northern-runway/2021/eia.pdf> at 4.9 page 29. I pointed out this stance was not understandable from how it was written. So where is the forecast and related reduced economic benefits if Heathrow r3 does take place? I was told this will be done for the planning inspectorate application. I said the public will not be

aware of this as no further public consultation will be made. I was told there is a route that the public can register an interest when the formal planning application is made and can comment on the revised figures then. I think this is an incorrect way of proceeding. What if the passenger forecast is 35% less with Heathrow.... and eg 25% less due to climate change attitudes..where is that risk/ sensitivity analysis? Would the benefits of the GAL scheme stand up then? Who knows? I really don't, so how can you ask me to make an informed response now without this information? I cannot judge. Further I do not believe that adding missing risk analysis figures to only the full planning application will give the wider public a chance to reappraise the merits of the scheme, which means that this consultation has again failed to enable me to make an informed decision.

5. How is the continuing financial loss during the pandemic going to be recovered? I ask because Heathrow is raising landing fees - is that an option for Gatwick too? (Higher fees = lower travel demand.) On the call it was stated this may or may not be an option - so this 'may' or 'may not' lead to lower demand. IMO this is another significant risk to the passenger forecast levels and needs to be added to the sensitivity analysis of the above points. I do not know for example if GAL will raise landing fees by 50% to cover covid based loses, loses that may well continue far longer than GAL currently foresees - so in turn I cannot judge whether any new runway will be required in the time scales of the scheme (higher price=lower demand). So you could label the consultation very premature in this regard. GAL are assuming a 5 year suppressed demand, yet Austria is now back into full lockdown, and the highly likely occurrence of new covid variants seems to have been forgotten about by GAL. Covid is NOT over by any means, and only will be when the whole world is immune or vaccinated. Covid impact is very likely to be more than 5 years and is therefore a significant but unmonetarised risk to GAL's scheme. The need for updated booster jabs to counter new covid variants will continue for years which in turn may suppress the desire to travel as other countries will differ wildly in their resilience to covid at any particular time.

see:- [h](#)

6. Do your forecasts take a view on whether kerosene will be taxed in UK or EU? or vat applied to fares? It is looking very likely that the EU will put more tax on aircraft fuel which will impact demand.

On the call it was stated this might not have been assessed - so this may or may not lead to lower demand. IMO this needs to be added to the sensitivity analysis of above points. To be done? Since my call it has been confirmed that the EU will be taxing aircraft fuel, and will adopt a value based on energy content rather than volume.



So this tax is coming and yet has not been mentioned or assessed by GAL at all as a risk factor for the passenger demand forecasts. Will the forecast be 5%, 10% or 20% lower due to increased taxes? Will the net economic benefits then balance the net damages? I can't form a view if the sensitivity analysis has not been done and I do not believe anyone else can either.

7. On page 61 of the same doc in point 2 above, Dementia is mentioned as an impacted issue with a £ cost. What number of people have been assumed will be newly affected by dementia because of the project? Additionally, what number of people have been assumed to be affected by sleep disturbance? What are the baseline numbers in 2018? On the call it was stated this was unknown but will be looked into and may be added to the application once made. I remarked that without such numbers I cannot make a human interpretation of the magnitude of the impact; £3.5m is meaningless without a reference that is understandable. So once again I cannot form a judgement/response on this scheme purely because the consultation does not give me sufficient information to do so.
8. In <https://www.gatwickairport.com/globalassets/company/future-plans/northern-runway/2021/peir/vol2/peir-figure-15.6.2.pdf> shows a map of the assessed area for NO and particulate pollutants. Where are the diagrams/maps which show the increase of NO/ particulate pm2.5 pollution matter across this area? Without this I cannot know WHERE you are predicting there will be increases in these polluting metrics. There are only tables of locations that are shown in <https://www.gatwickairport.com/globalassets/company/future-plans/northern-runway/2021/peir/vol3/peir-appendix-13.9.1.pdf> but these are useless in allowing me to assess impacts near me in a geospatial way. (un-interpretable) On the call it was stated that I am correct and that the next stage will show this, I again countered that the public wont be able to see and comment on this. As per previous questions I was told there is a route by which the public can register interest when the formal planning application is made and can comment on the revised figures then. I made the point that without such map based info now , people would look at the mapped area and assume that because there is no map showing little red squares of increase that all is ok - and lead unfairly to a strengthening view that the GAL scheme is all OK. IMO the use of **preliminary** environmental assessments is not enough for people to have a informed position.

Noise issues:-

1. The sound footprint shown on <https://www.gatwickairport.com/company/future-plans/northern-runway/2021/peir/vol2/peir-figure-14.9.25.pdf>

does not represent the centre line of the current prnav line for the Bogna SID. IF your centre line has been used for all subsequent modelling, then there is a significant misrepresentation of the current and therefore future location of overflights and noise impact. The current actual prnav line (default route of all departing air traffic using BOGNA SID) and line for concentrated noise impact, is 3 miles further east and towards Slinfold and Horsham, than you have modelled. The true line for maximum noise impact is shown correctly in GALS own 2020 annual report in **fig 52** page 34 of <https://www.gatwickairport.com/globalassets/company/airspace/noise-reports/2020/airspace-office-annual-report-2020.pdf> and in the 2018 annual report document <https://www.gatwickairport.com/globalassets/company/airspace/noise-reports/fpt/noise-contour-report-2018.pdf> at page 35

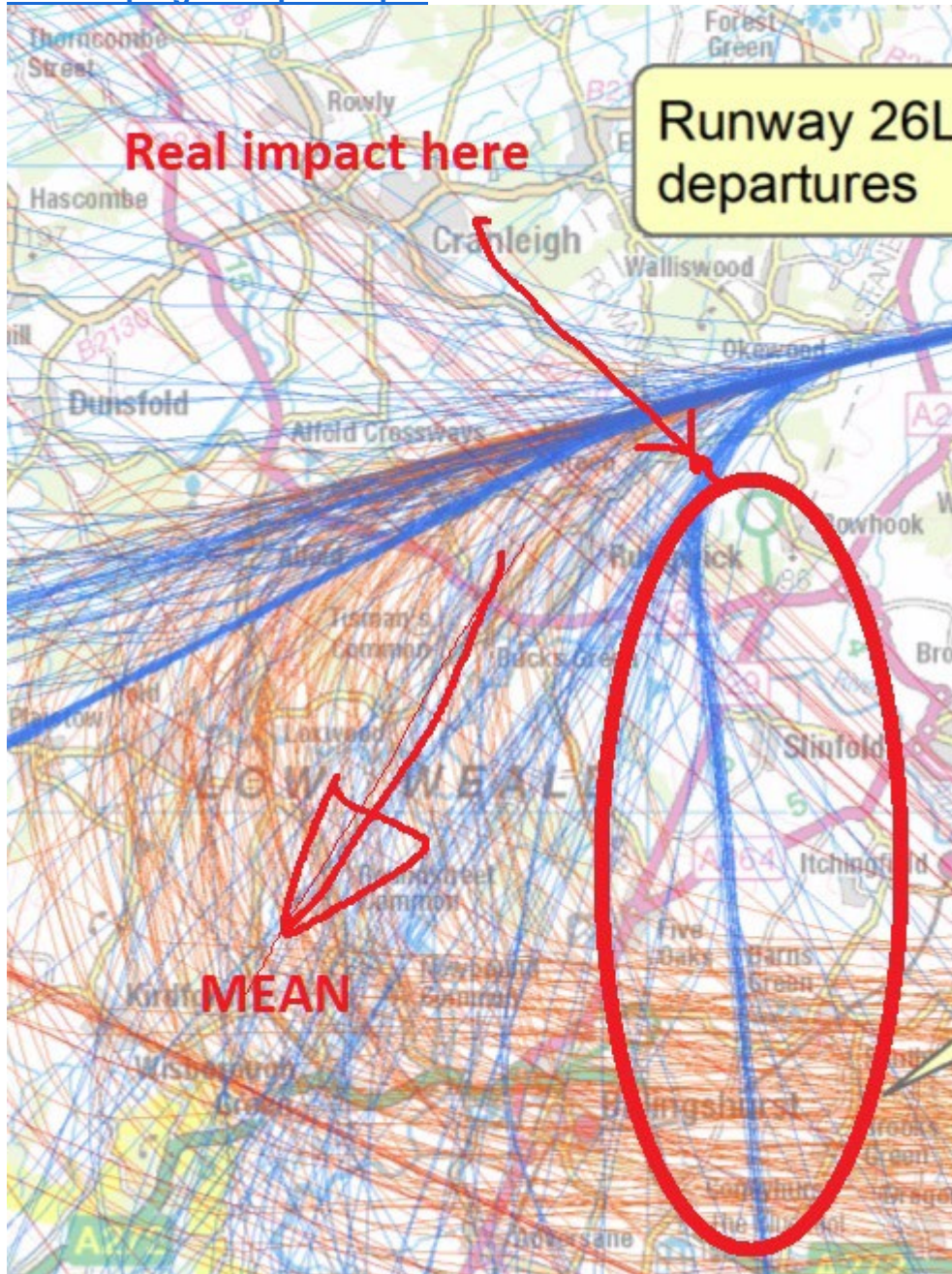
In addition, **attached** is the modeled noise footprint sourced directly from the CAA showing a BOGNA dbmax analysis and this also does not agree with the position you have assumed. Therefore many of your subsequent maps are wrongly showing the maximum impacts eg this <https://www.gatwickairport.com/globalassets/company/future-plans/northern-runway/2021/peir/vol2/peir-figure-14.9.23.pdf>

where the 60dbmax contour that is for bogna, is wrongly located (too westerly) and misrepresenting future impacts to Slinfold and other communities.

If you agree with me that the maps you have created are not representing the position of the 2018 and future year Bogna noise impact correctly, what will be your next steps to rectify this fault? (On my call with GAL I was told this would be checked by GAL. subsequently I've tried to digitally overlay consult position with the caa position - as attached and clearly showing a mismatch).

GALS reply to me 24.11.21 explains that a mean/average has been used to position the noise. The problem with this average is that it is for a very wide area (an average of 2 SIDS?) and does not characterise the maximum that is actually witnessed and received by communities directly under the BOGNA flight path. This shows an inconsistent approach by GAL; they are using highest possible passenger forecast numbers to maximise noise impact (and which maximises derived economic benefits), yet they do not apply that concept of maximising noise impact to the assumed positions of flight paths. Notice how both approaches favour the airport. GAL also ignores departing flights over 7,000ft further decreasing the impact of noise dosage. The end result is GALs approach does not then assess annoyance or impact for individual SIDS which will be worse than when using wide area averages. Therefore I do not believe a representative impact of the scheme can be gained for the bogna SID and I cannot judge the merits of this scheme. Here below is the typical distribution over the western area. Of course the mean average will be spread due to the wide distribution of directions - and this spread will not

characterise the main leg of disturbing noise due south towards Slinfold. Consultation is deficient as it is not accurately assessing noise impact. This goes against the planning inspectorate wishes for this consultation. Quote "The Inspectorate recognises the importance of establishing an accurate and current baseline in order to determine the need for noise mitigation measures. The ES should demonstrate regard to the Airports NPS in this respect" <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR020005/TR020005-000043-GTWK%20-%20Scoping%20Opinion.pdf>



2. Your overflight

diagram <https://www.gatwickairport.com/globalassets/company/future-plans/northern-runway/2021/peir/vol2/peir-figure-8.6.5.pdf> 'could' be good way for the public to see increases of overflight. But it is flawed because it uses a map key which has a series of range thresholds that are too large to be able to show the actual increase in overflight at most locations. This then completely defeats the purpose of the map. During the call with GAL this was largely accepted, and I was told to expect generally a daily 20% increase in the number of daily flights per SID. However I think that for people in the yellow and orange areas, such an increase will NOT be identifiable from looking at the map, as the range would not even make visible a 100% increase let alone a 20% increase. **Do you agree with that statement? (GAL did not answer this in response 24.11.21 so implies they agree)** So by looking at the overflight maps, most of the public would assume 'very little' changes as a current yellow or orange colour does not change colour as the scheme is implemented. This makes objective interpretation very very difficult. There was no reason why a greater number of colours and finer intervals could be used to allow showing of actual 20% increases. On the call I was advised to look at table 14.9.2

of <https://www.gatwickairport.com/globalassets/company/future-plans/northern-runway/2021/peir/vol1/peir-chapter-14-noise-and-vibration.pdf> which shows specific locations and the increase of overflights flights there. However none of these locations are near Slinfold - and none in a yellow or orange area, so it is unreasonable to be expected to try to extrapolate from that table what the increase in Slinfold would be. Increases in existing yellow and orange (and red) areas is therefore not readily obtainable information from the consultation documents. IMO therefore, the consultation is deficient as I have been unable to make an objective judgement about the merits/ dis-benefits of the scheme for my location in Slinfold. (On the call, the use of large key ranges were justified because of the 'large areas that need to be shown' - out towards Guildford was the stated example. This excuse in no way means that a finer range division could not have been used, GALs defense is not credible. Pictures are more powerful than words - and this one APPEARS to show very little change with the scheme , but this perception is unfairly created as the key range of changes is so large. Therefore **you are failing me as I cannot make an objective assessment about the real increase of overflight at Slinfold.**

Therefore, this issue is not answered. GAL responded 24.11.21 , the question about the range being so large was not directly addressed and GAL only repeated that there will be a 20% increase. As pointed out this increase is not visible due to the large range of values in the key colours. My point that this masks the increase still stands and is a major fault in creating interpretable information.

2a. There are a set of actual noise monitors around Gatwick. They are there because community disturbance has been a real issue at those locations in recent years. Slinfold has such a monitor. Would it not be highly informative, transparent and reasonable to show the existing noise metrics at these monitors based on real life data (in 2018) and then to show the same metrics at the same locations with scheme and without scheme? Total overflight numbers base and with scheme would be required at these locations plus N55, N60, N65 numbers. **Do you think without giving this info the consultation is more or less transparent?** (This point applies

to all 23 community located noise monitors) I think to not show impact at the very locations that communities already have noise impacts is being economic with the truth so as to minimise reaction in the community to GALs scheme = zero transparency in that respect.

GALs response on 24.11.21 does not answer my question - you incredibly say you have chosen to not show ANY of the 23 noise monitoring stations. - this imo makes this consultation far less transparent and accurate than it ought to be. Indeed the planning inspectorate comment on this was for GAL to ensure accuracy in this matter - and there can be no better way than to use the existent data for the baseline situations at the noise monitoring sites.

Quote "The Inspectorate recognises the importance of establishing an accurate and current baseline in order to determine the need for noise mitigation measures. The ES should demonstrate regard to the Airports NPS in this respect" <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR020005/TR020005-000043-GTWK%20-%20Scoping%20Opinion.pdf>

3. On the call it was said that the distribution of flights across all Gatwicks' SIDS would be similar to today. I questioned then why

on <https://www.gatwickairport.com/globalassets/company/future-plans/northern-runway/2021/peir/vol2/peir-figure-14.6.13.pdf>

there are n65 contours for the southern turn left west from runway 26 that goes between horsham and crawley, (WIZAD) yet none are shown for the much more used bogna southern left turn. It implies Bogna SID would be used less or not at all. I was told this would be checked. Subsequent to the call with GAL, I now believe it is because 65dbamax is not reached in the southerly part of the Bogna turn. HOWEVER the use of n65 day and not additionally the n60 and N55 incidence values, means I cannot judge the impact to the bogna swath south of the 65dbamax line. **This means we cannot come to a view on the scheme's impact in Slinfold. Why are N55 n60 maps not shown?** Could it possibly be that n55/n60s would visibly show a greater increase in change between baseline and the scheme. Might that be possible? **Can I see the N55 and the N60 contours to get an idea of the impact on Slinfold?**

By arbitrarily not showing noise contours below 65db, the full impact of increased flights is not shown and therefore how can this consultation be considered as fair or transparent ? Bear in mind that a single plane emitting 61dbamax on the ground will wake a sleeping person, so it is highly reasonable to expect at least n60 event contours/information.

GALs response 24.11.21 does not provide access to n60 day time metrics - so I am unable to judge the true disturbance impact of the scheme. Further imo GAL has not demonstrated how it is supplying noise metrics which take in consideration concentrated prnav flying. As GAL fully knows, prnav navigation creates problems with overflying the same place with increased frequency of planes - which points to the use of n60 day time values - which are not shown despite the planning inspectorate saying this ..quote. "The ES should ensure that it presents an assessment of the realistic worse-case scenarios for the Proposed Development, including consideration of any airspace change implications for the noise assessment and the introduction of performance-based

navigation." <https://infrastructure.planninginspectorate.gov.uk/wp>

Further, GAL says that N60 contours show the overflight at Slinfold is less than 10 in the night - presumably that ignores flights over 7000ft? and if you agree it is a good metric for night, why not show n60 in the day? That remains unanswered.

4. Leq16hr is calculated from 7am onwards for 16 hours. **Correct?** This presumably then misses the highly sensitive early morning rush hour from 5.50am to 7am at Gatwick when a great number of flights depart for southern Europe. **Is that statement correct? (yes)** This rush hour could be dis-proportionally impacted with hugely increased flight numbers in the new scheme... yet this would not show up in any of the leq16hr average modeling / maps. **Is that a correct statement? (yes)** Could the leq16hr metric mask short but significant increases (and detrimental to health) that if occurring during sensitive hours, would be of extreme and critical value for residents to know about before your scheme is built? **(yes)** (5.50am to 7am would be covered in nighttime leq figure - but equally would be diluted by lower volumes of traffic at night so the point still stands) To elaborate, real world (not modelled) n60 2hr at Slinfold for 6am -8am is commonly 40 ie 20 planes per hour in summer period - that is 1 plane every 3 mins approx, (We have data sets from CAA if you wish I can supply them, though Andy Sinclair should be able to give them to you more easily) which is very disturbing in this time frame. This is exactly why there is a noise monitor in Slinfold which has given us this information. **So with your new scheme, I would like to know whether the n60 2hr value (6am - 8am) would be going up or down and by how much?** None of the maps or tables in the consultation seems to tell me the answer to this question. I can't even see what the number of aircraft will be baseline and with scheme over 16hrs for all altitudes. (figure 14.6.9 shows 2018 baseline but there is no equivalent for 2032 etc?) **If you confirm this information is not present, then how can we make an impact judgement about your scheme?** The concern is that departures on both runways, using a southerly routing to Mediterranean destinations, will peak from 6am to 9am and instead of 20 planes per hour, Slinfold would experience 20-40 planes per hour. This could happen and be masked by an overall 20% increase for the whole day - which is GALS headline stance. **Is this a probable deduction? If not what is the figure? AS it stands I cannot form an opinion due to this missing information.**

GALs response 24.11.21 does not provide direct answers to this other than saying n60 day time metrics are not being shown and restatement of the hours used for calculation of leq average values - so I am unable to judge the true disturbance impact of the scheme.

Also missing from GALS noise assessment is use of summer day and night metrics that better characterise the likely maximum impact of future aircraft forecasts. There are leq maps that show annual averages for day and separately for night but these are annual averages that will not be representative of the summer peak period. So a summer peak period leq contour map is required to reflect the highly skewed usage at Gatwick which is holiday maker driven - ie summer peak. Stansted and Heathrow airports follow this approach. see <https://www.braintree.gov.uk/downloads/file/748/exd087-2of4->

[further-info-by-mag-stn-airport-env-statement-chapter-7-air-noise-contours-2028](#) at page 81 (fig 2028dcl summer night countours. **There is no equivalent in the GAL scheme docs. This lack of characterising maximum impacts again goes against what the planning inspectorate requested for worst case assessment - quote. "The ES should ensure that it presents an assessment of the realistic worse-case scenarios for the Proposed Development, including consideration of any airspace change implications for the noise assessment and the introduction of performance-based navigation."** <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020005/TR020005-000043-GTWK%20-%20Scoping%20Opinion.pdf>

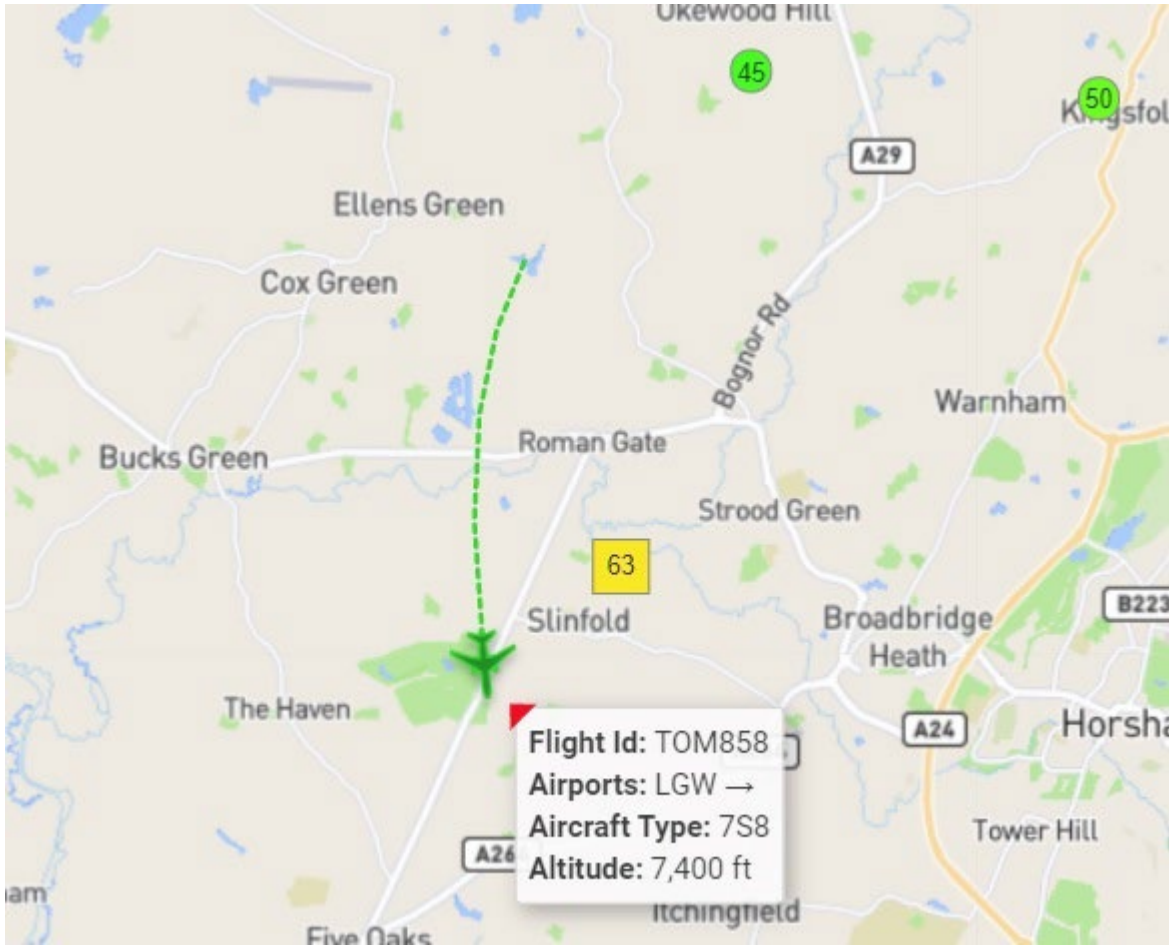
5. Flights below 7000ft are shown. **Why not above 7000ft?** Planes between 7000ft and 10,000ft commonly overhead at Slinfold are producing 62-63db (evidence as below) and yet they do not exist in your analyses or portrayals. The increase in overflights shown in diagrams 8.6.5 ARE limited to below 7000ft. <https://www.gatwickairport.com/globalassets/company/future-plans/northern-runway/2021/peir/vol2/peir-figure-8.6.5.pdf> **What then is the proportion of flights that are missing?** Without being told about these missing flights I am unable to assess the impact of the scheme in Slinfold.

GALs response to me 24.11.21 states " CAP 1616 sets an upper limit on overflights for the purpose of information noise assessment, at 7,000 ft." . I say that this is 100% wrong. CAP1616 firstly says that noise is only a PRIORITY consideration upto 7000ft, but does not set an upper limit for overall assessment, and secondly there is a very important para b.56 in cap1616 which states that when 7000ft+ aircraft are audible (and you know they are in Slinfold from noise monitors) that total overflight values can be used. So where precisely does cap1616 state an upper limit? It does not. GAL is 100% wrong in this respect and my need for n60 daytime/early morning worst case values for all overflights is the only way impact in Slinfold can be judged. The consultation documents are deficient. Note that Crawley Council called for Lden values at 40 and 45db to show the full impact, GAL choose to ignore that recommendation from one of the closest local authorities to the airport.

Note that recent planning applications for increased plane movements at stansted and heathrow airports do not exclude flights over 7000ft see here - there is no mention of excluding such flights which enables a full assessment of flight impacts. <https://www.braintree.gov.uk/downloads/file/748/exd087-2of4-further-info-by-mag-stn-airport-env-statement-chapter-7-air-noise-contours-2028>

In addition, it is fact that apprx 1/4 of total gatwick planes near Slinfold are over 7000ft AND, repeat AND, create more than 59-60dbamax. Just today on webtrak I have screen captured examples eg 62db @10,000ft and 63db at 7400ft, so don't tell me that flights over 7000ft are not audible - these are evidenced

below and GAL knows this, it is GALS noise monitor. Don't tell me either that these are extraordinary events. I have months of a 2015 noise data set from the slinfold noise monitor. This evidences just for example on 15.9.15, 7 flights within 1 hr from 05.47am (sensitive hour) that are all over 7000 and all creating over 61dbamax. The data set is attached. This is irrefutable evidence of why I cannot use your consultation documents that exclude flights over 7000ft. This is the exact reason why I have asked for n60 day time values - but you have refused to publish these. This issue is extremely serious and will not only affect Slinfold but many other populations near the departure tracks. Also below is the standard NATS noise table that shows flights over 7000ft will to create noise over 60db. SO there are at least 3 reasons why you should not be ignoring flights over 7,000ft.



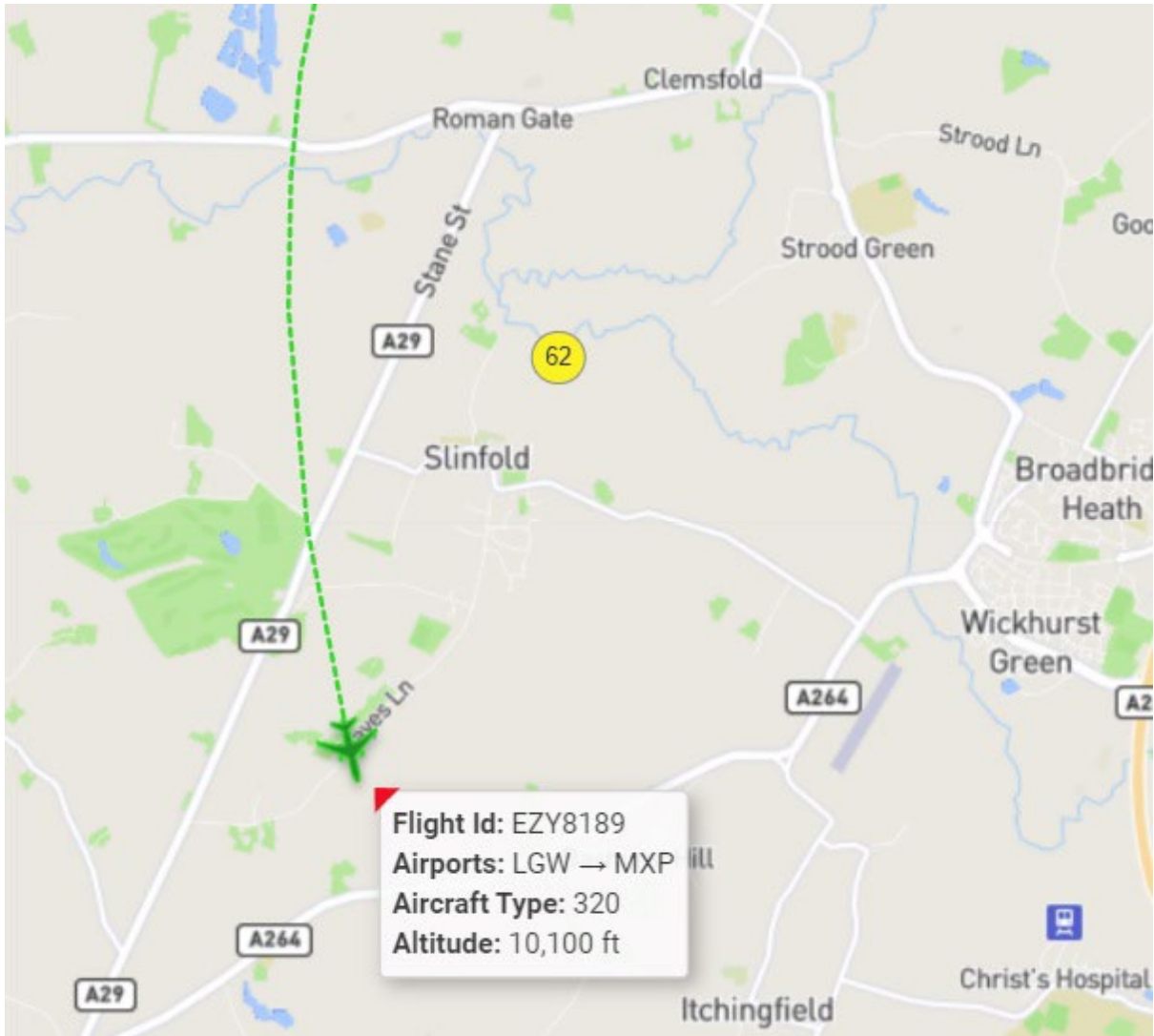


Table 3: Departure L_{max} levels by aircraft grouping

Height (ft)	Turbo-prop	50 seat regional jet	70-90 seat regional jet	125-180 seat single-aisle 2-eng jet	250 seat twin-aisle 2-eng jet	300-350 seat twin-aisle jet	400 seat 4-eng jet	500 seat 4-eng jet
1000-2000	78-71	78-70	85-75	85-75	92-83	90-81	92-84	91-84
2000-3000	71-67	70-65	75-68	75-70	83-77	81-75	84-79	84-80
3000-4000	67-64	65-60	68-64	70-66	77-73	75-71	79-75	80-76
4000-5000	64-62	60-57	64-61	66-63	73-69	71-67	75-72	76-73
5000-6000	62-60	57-55	61-58	63-60	69-66	67-64	72-69	73-71
6000-7000	60-58		58-56	60-59	66-64	64-62	69-67	71-68
7000-8000	58-56		56-56	59-58	64-61	62-60	67-64	68-66
8000-9000	56-56		56-55	58-57	61-59	60-58	64-62	66-65
9000-10000	56-55			57-56	59-58	58-57	62-60	65-63
10000-11000				56-56	58-57	57-56	60-60	63-62
11000-12000				56-56	57-56	56-55	60-59	62-60
12000-13000				56-55	56-56		59-58	60-59
13000-14000					56-55		58-58	59-58
14000-15000							58-57	58-55
15000-16000							57-57	

6. In the preliminary environmental information report page 103 at 14.12.12 WebTAG is mentioned but the results not discussed re relevance or consequence.

<https://www.gatwickairport.com/globalassets/company/future-plans/northern-runway/2021/peir/vol1/peir-chapter-14-noise-and-vibration.pdf> All that is mentioned is the NPV of a 'something' which is not labelled or defined - ie table 14.12.2 does not describe what it is that it is showing, is this baseline impact at 2010 costs? Then where are the values with the scheme? Not shown there, but... ridiculously they are split out and appear in an appendix doc <https://www.gatwickairport.com/globalassets/company/future-plans/northern-runway/2021/peir/vol3/peir-appendix-14.9.2.pdf> at chapter 6 page 18. This makes it near impossible to compare baseline to scheme NPVs of the items. Instead the only analysis/comment by GAL is quote " The sleep disturbance costs are less than half the total. This is shown in the night-time noise contours changing less with the Project than day contours" **What on earth does this mean?**

Gals response of 24.11.21 does not make it clear where the equivalent npv costs are without the scheme in the selected years - so no comparison can be made of cost with and with out the scheme. This is a major flaw as I cannot compare the impact of the scheme.

7. In <https://www.gatwickairport.com/globalassets/company/future-plans/northern-runway/2021/eia.pdf> at figure 4.8 page 60.

This picture seems to imply that 6000 people will be newly affected by the project (in terms suggested by CAA) in nighttime and 12,000 people in daytime. Is this a correct interpretation of the picture? If so these would be valuable numbers and understandable by people - yet these total figures are **not** mentioned in either the summary or overview documents. If my interpretation is right, GAL has not been transparent in highlighting these numbers in the documents that most of the public will read.

8. GAL states at chapter 6 in the summary document <https://www.gatwickairport.com/globalassets/company/future-plans/northern-runway/2021/summary.pdf> - quote "the main noise impacts from our proposals are expected to be predominantly as a result of the **increased frequency of flights**" very unfortunately this increase is not portrayed nor discussed in the summary doc. In fig 6.1 , page 20 of the summary , there are no units on the noise map; dbamax or leq or what? Relevant noise event loudness and worst case how many times per hour the event will occur (ie frequency) is the key information we require (as you confirmed in the above statement) and yet we cannot see this from your consultation documents for Slinfold (and many many, other areas) . This very basic information is what is also called for in this link <https://pagne.org/wp-content/uploads/2018/08/GATWICK-NOISE-METRICS-PROPOSAL-Final.pdf> **I do not think the summary doc is representative of the impact without such portrayal of the increases.**

GALs reply on 24.11.21 says the summary doc is high level. Saying that does not nullify the fact that there is no units on the contested map so those people only reading the summary have no idea what the map is showing.

9. In <https://www.gatwickairport.com/globalassets/company/future-plans/northern-runway/2021/peir/vol1/peir-chapter-14-noise-and-vibration.pdf> at 14.8.57 GAL states

the following noise objective for the Project: "The Project will: - avoid significant adverse impacts on health and quality of life from noise; - mitigate and minimise adverse impacts on health and quality of life from noise"

The problem of early morning disturbance by planes at 61dbmax and above is recognised by WHO, who state that anything over 61db is likely to wake a person up. In Slinfold this is exactly what happens and already IS a significant adverse impact on health as sleep is disturbed. If your answer to question 4 above is yes, there will be an increase in early morning flights (25-40 planes per hour), then it means that you have failed your stated objective. Is that correct?

GALs reply on 24.11.21 says this is simplistic. Saying that does not nullify the fact that there is likely to be a significant increase in 61db creating overflights in Slinfold and that is not 'avoiding significant adverse effects'

10. **Did GAL consider how usable or readable the docs are? Or are they deliberately unreadable?** I would say it is a nightmare to follow and to cross relate tables, diagrams and figures as they are all held in different documents and there is no cross linking with embedded hyperlinks to enable easy reading. Aircraft noise has been spliced in with ground noise issues in the same doc which further leads to excess time being spent as the theme of aircraft noise is fragmented across paragraphs and documents. The net result eg I have spent 30mins just looking for table 14.12.1 at page

102 <https://www.gatwickairport.com/globalassets/company/future-plans/northern-runway/2021/peir/vol1/peir-chapter-14-noise-and-vibration.pdf> and its location map in a completely different document on figure

14.6.9 <https://www.gatwickairport.com/globalassets/company/future-plans/northern-runway/2021/peir/vol2/peir-figure-14.6.9.pdf> There is no cross linking or mention of the figure on the table or vice versa.

GALs reply on 24.11.21 says there are ways to ask for help to understand the consult documents. Saying that does not nullify the fact that people will have considerable difficulty following these documents - which imo will lead to fewer people digging into the detail as it is not accessible as is required by the Gunning Principles.

11. Airspace in the south of England is being redesigned - FASI-S . There could be changes that would have a material effect on gatwick procedures/altitudes/routes/holding stacks and therefore noise impact. All the air noise assessments would need to be reworked (**as was confirmed on the call**)- and a new consultation begun? This consultation is therefore premature.

Gals response 24.11.21 didn't answer the direct question of whether a new consultation would be needed to show scheme impacts if FASIS is consulted on before the schemes planning approval, so I still believe the timing of this consultation is premature. GAL provided no scenarios re FASIS and that is in contravention of what the planning inspectorate had to say in the scoping document about this.

Quote "For the avoidance of doubt the Inspectorate does not agree that the Airspace Change process (FASI-S and / or airspace change to enable dual runway operations) can be scoped out of the assessment at this stage" <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020005/TR020005-000043-GTWK%20-%20Scoping%20Opinion.pdf>

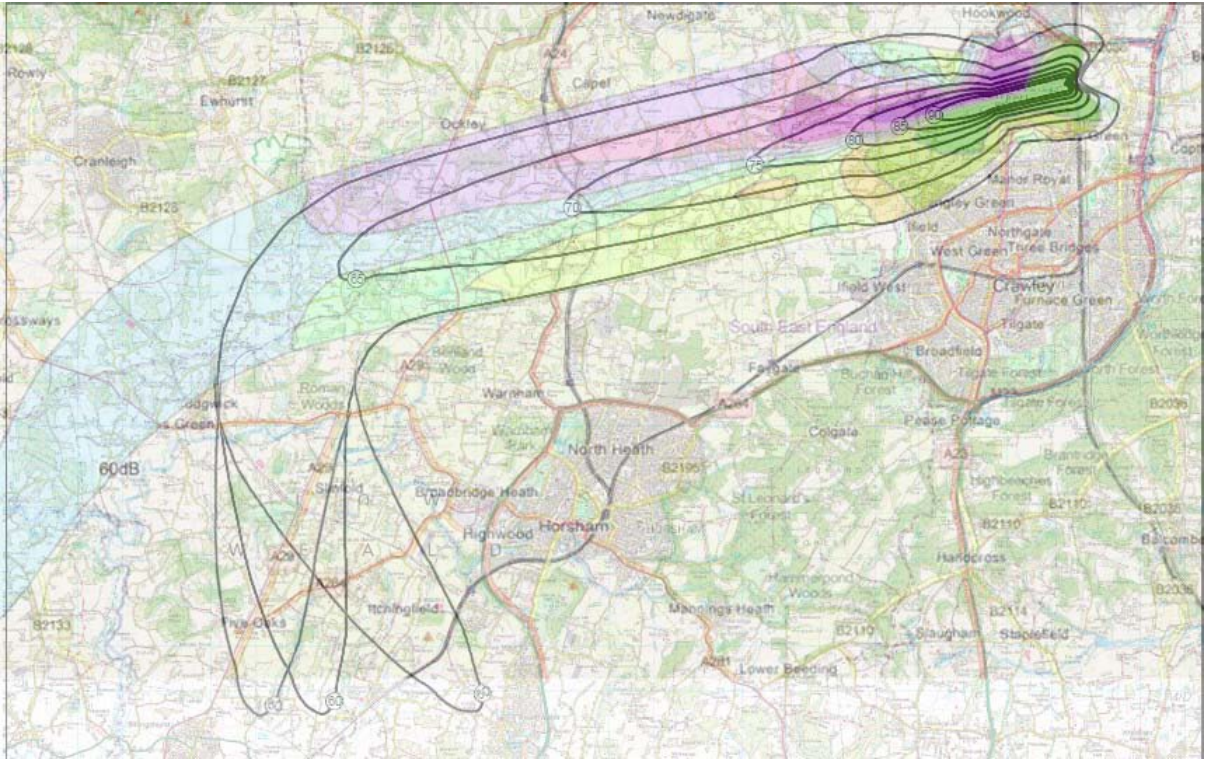
12. Why is the map shown
in <https://www.gatwickairport.com/globalassets/company/future-plans/northern-runway/2021/peir/vol2/peir-figure-14.9.28.pdf>

cut so as not to show areas that are overflowed further from the airport? Slinfold is impacted and yet it is not even on the map. This inadvertently gives the impression that those areas **not** shown on this map are not significantly impacted, which is wrong. **Do you agree that people might have that impression?**

Gals response 24.11.21 explained the purpose of the map - overflights - but still there was no reason to crop the shown area - and I do still believe it wrongly emphasizes that the impacts will be restricted close to the airport.

Stuart Spencer

Slinfold



Number: 2

Name: GATCOM

Date received: 1 March 2022

From: Paula Street [REDACTED] <[\[REDACTED\]@westsussex.gov.uk](mailto:[REDACTED]@westsussex.gov.uk)>
Sent: 01 March 2022 15:40
To: Guest, Susannah <susannah.guest@planninginspectorate.gov.uk>
Subject: Gatwick Northern Runway DCO

Dear Susannah,

I wonder if you could shed some light on a matter related to Gatwick's preparation of its DCO application please?

Gatwick Airport Limited (GAL) published as part of its pre-application consultation a proposed noise envelope. This was the first time that interested parties had been advised of the proposal and there had not been any engagement with local authorities or other community interests on the proposal development of the noise envelope design. GAL's proposal for a noise envelope is a strategically important moment for dealing with noise in and around Gatwick Airport.

It is not yet known whether GAL intends to seek further engagement on the evolving design or whether it will just submit the final design taking into account pre-application consultation feedback as part of the application submission. The Chair of GATCOM and the Chair of Gatwick's Noise Management Executive Board have a meeting with GAL next Monday (7 March) to discuss a way forward on how GAL can achieve an appropriately inclusive process, further engagement on, and development of, the noise envelope before GAL's submission of the DCO application. This is an issue of great concern to many interested parties as the CAA's guidance on noise envelope preparation and design in [CAP 1129](#) sets out a series of consultation requirements for noise envelope design and changes which have not been observed to date. GATCOM hopes that GAL will, once it has considered pre-application consultation feedback, look to observe the noise envelope design process set out in the CAA's guidance.

However, we do not wish to press for this if the further engagement required as part of that process would not be in accordance with or bring into question the requirements of the DCO process. Please can you advise? Does the DCO process override the CAA's guidance or is there still scope to have further engagement with interested parties, including communities?

I look forward to hearing from you.

Best regards

Paula

NB: Please note I work part time and my usual working days are Monday, Tuesday and Thursday.

ADVANCE NOTICE OF ANNUAL LEAVE – I'M AWAY FROM FRIDAY 25 FEBRUARY RETURNING ON WEDNESDAY 2ND MARCH 2022

Number: 3

Name: GATCOM

Date received: 9 March 2022

From: [Guest, Susannah](#)
To: [Gatwick Airport](#)
Subject: FW: Pre-application DCO process - advice request
Date: 09 March 2022 18:16:45
Attachments: [GACC_Response_Feb22.pdf](#)

From: Paula Street [REDACTED]@westsussex.gov.uk>
Sent: 09 March 2022 15:59
To: Guest, Susannah <susannah.guest@planninginspectorate.gov.uk>
Subject: Pre-application DCO process - advice request

Dear Susannah,

I have another matter on which I wish to seek advice about the DCO process. Having read the Inspectorate's guidance it is not clear what remedies are available to interested parties to raise issues where it is believed the pre-application consultation material was inaccurate and misleading which could affect the views expressed at the pre-application consultation stage and therefore skew the results of the consultation exercise.

There is growing concern amongst some GATCOM members about the supporting evidence that Gatwick Airport Limited provided in relation to the carbon cost values used to demonstrate the economic benefits of the Northern Runway Scheme. Gatwick's calculations were based on the Government's old carbon cost values and not the new cost values issued a few days prior to the launch of Gatwick's consultation.

I fully appreciate that you are not in a position to comment on the evidence provided to date and I accept that it is not unusual over the course of preparing a submission of an application, particularly for complex/large scale development projects, for circumstances and evidence to change. Attached is a recent letter the Chairman wrote to a GATCOM member in response to concerns they had raised as way of background to my advice request from the Inspectorate.

The GATCOM Chairman has since been asked by a few members to have an opportunity to discuss this matter at a GATCOM meeting to help build an understanding of the process and of the remedies available to correct information/evidence and seek views on changed circumstances prior to the submission of the application. We have an item on the agenda for the GATCOM meeting on 28 April 2022 for members to share their concerns. It would be helpful therefore if you could provide advice on the mechanisms available for stakeholders and the public, and at what stage in the process, where concerns of this nature can be raised and addressed. I would also like to invite you to the GATCOM meeting on 28 April to advise the Committee of the next steps in the process that need to be taken by an applicant, the host local authorities and where there are opportunities for further engagement prior to the application submission. Is that possible please?

I look forward to hearing from you.

Best regards

[REDACTED]

NB: Please note I work part time and my usual working days are Monday, Tuesday and Thursday.



[REDACTED] | Deputy Secretary, Gatwick Airport Consultative Committee (GATCOM), | Location: Room 102, First Floor,
West Wing North, County Hall, Chichester, West Sussex, PO19 1RQ
Internal: 22543| External: + 44 (0) 33022 22543 | E-mail: secretary@gatcom.org.uk | website: www.gatcom.org.uk

Tom Crowley
Chairman

County Hall
Chichester
West Sussex
PO19 1RQ



Gatwick Airport Consultative Committee

Telephone 0330 222543

Website: www.gatcom.org.uk

If calling ask for
Mrs. Paula Street
e-mail: secretary@gatcom.org.uk

9 February 2022

Dear Peter,

Request for emergency meeting

Thank you for your letter of 31 January and for bringing this important matter to my attention. I have carefully considered your request to call an emergency meeting of GATCOM to discuss the findings of the New Economics Foundation (NEF) as outlined in [their article of 27 January](#). However, having liaised with the Vice-Chair and the Secretariat, I do not believe there is a need to call a special meeting.

My reason for this is that it is not unusual over the course of preparing a submission of a planning application, particularly for complex/large scale development projects, for circumstances to change. What is important is that when the actual application is eventually submitted the supporting evidence is up to date reflecting the latest government requirements, policies and cost values which will then be scrutinised and assessed by the Examining Authority (PINS) to initially determine whether there are errors and omissions and then ultimately by the Secretary of State.

I have sought GAL's comments on your concerns and its response is set out in the Annex to this letter for your information. As you will see GAL accepts that it will need to study what the Government's updated cost values mean for its expansion plans over the next few months. I am also aware that many GATCOM member organisations are of the view that GAL needs to update evidence (and/or to provide the missing evidence) for a number of topics, not just in relation to carbon.

In addition to this, it is likely that Government will issue a new aviation strategy, its response to the Jet Zero consultation and other new policy guidance between now and GAL's submission of its DCO application, meaning that any new policies and requirements will also need to be taken into account in GAL's submission.

Notwithstanding this, I would also remind you that in responding to GAL's Northern Runway pre-application consultation GATCOM referenced the fact that the Committee was aware that other organisations had commissioned their own economic research into GAL's assumptions on the economic benefits of and the need for the Northern Runway project and had requested that GAL gives full consideration to and takes account of the outcomes of those studies in

BY EMAIL

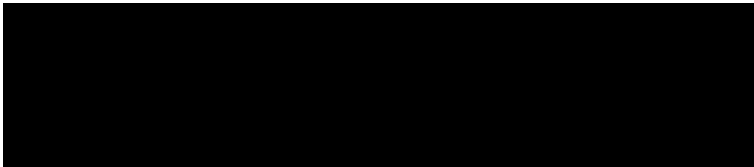
Peter Barclay
Chairman
Gatwick Area Conservation Campaign

advance of preparing the DCO application submission. GATCOM's response therefore captures the fact that the previous work by the NEF for GACC which, as you say, is referenced in your own response to the consultation. In light of GACC's continuing concerns and the new findings of NEF, I suggest it is for GACC to seek to add to its own consultation submission.

GAL reported at the last GATCOM that it will take several months for all the comments received to the consultation to be considered before work begins on revising and finalising the environmental statement and the submission to the Planning Inspectorate (GAL anticipates submission towards the end of the year). I suggest therefore that at the appropriate time we seek an update on this topic and indeed on other matters, where GAL has added to or revised its assumptions and calculations as a result of consultation responses and changes to Government policy and requirements.

I will circulate your letter and my response to all GATCOM members so that they are aware of the concerns you have raised and my response.

Yours sincerely,



Tom Crowley
Chairman

GAL's advice to Secretariat 07/02/22

From: Tim Norwood

The responsibility of examining GAL's planning (DCO) application including checking how calculations have been made and then balancing the reported economic benefits and environmental impacts in reaching a decision rests initially with the Planning Inspectorate and ultimately with the Secretary of State.

For some background info – by necessity our consultation was a snap shot in time. The Govt published its 'Valuation of greenhouse gas emissions: for policy appraisal and evaluation' on 2nd Sept 2021, less than a week before we launched the consultation and after we had already published the SOCC and announced the start date. We did not and could not have foreseen this information becoming available.

We are aware that the Government has updated its carbon pricing but just because we didn't use the figures published a few days before we launched our consultation, does not mean our consultation was misleading or cannot be relied on. Its perfectly normal in the course of preparing big planning submissions for things to change, and so what is important is that the latest values are used in the planning application itself and examined in the proper way through the examination process.

Again for info – we issued the following statement to the local papers in response to some enquiries

A Gatwick spokesperson said: "We are acutely aware of our responsibilities on climate change and the environment and we will grow in a way that supports the Government in achieving its commitment to net zero emissions by 2050. Our Northern Runway plans are designed to unlock new capacity from our existing infrastructure, much of which is already in place.

"We believe our Northern Runway plans can be compatible with UK climate change targets given a strong industry focus on reducing emissions through market-based measures and innovation, including improvements in engine efficiency, the use of sustainable aviation fuels and hydrogen and electric-power technologies.

"We will be studying what the Government's updated figures mean for our expansion plans over the next few months, but we do not anticipate that adopting the new carbon pricing will mean that our plans are not necessary or not consentable."

Number: 4

Name: GACC

Date received: 15 March 2022

The Planning Inspectorate
Temple Quay
Bristol BS1 6PN
15th March , 2022



Dear Sirs,

Re: Gatwick Airport Consultation

We wrote to you on 21 December 2021 setting out a number of concerns in relation to Gatwick Airport's consultation on its proposals to develop its northern runway so as to bring it into routine use and increase the capacity of the airport.

One of the issues we referred to in that letter was the fact that Gatwick's economic analysis contained material errors and omissions. As a result we stated that we believed the consultation gave an erroneous and misleading impression of the benefits and costs of the proposed development.

On 27 January 2022 the New Economics Foundation (NEF) published a paper (available here: <https://neweconomics.org/2022/01/the-62bn-carbon-giveaway>) which confirmed that Gatwick's consultation had used out of date values for the carbon emissions projected to be generated by the proposed development. Specifically, Gatwick's consultation used historic government carbon values of £69 per tonne of CO₂ equivalent in 2020 rising to £231 in 2050. The current government values, which were issued before Gatwick's consultation was published, are £241 per tonne in 2020, rising to £378 in 2050. We understand Gatwick does not dispute the fact that it used out of date carbon values in its consultation.

Previous work by the NEF, which is referenced in our response to the consultation, identified that Gatwick's consultation also failed to quantify the non-CO₂ climate change effects of the air travel the development would facilitate and the climate impacts of arriving flights. Government guidance requires all these costs to be monetized and taken into account in project appraisals.

The effect of these errors and omissions is that the climate costs set out in the consultation were understated by many billions of pounds. NEF's analysis shows that if government guidance had been followed accurately and correct carbon emission values had been used, the overall net present cost of the climate impacts arising from Gatwick's proposed expansion would be at least £13bn, rising to £25bn with arriving flights fully accounted for.

The figure disclosed in Gatwick's consultation was £2bn. The difference between Gatwick's figures and NEF's is highly material in the context of the overall economic benefits claimed for the proposed development.

We note that Gatwick published a number of addenda to its consultation but did not take the opportunity to correct these errors.

As a result of these material errors and omissions the consultation was, in our view, misleading and responses to it cannot be relied upon. We believe it was not "*based on accurate information that gives consultees a clear view of what is proposed ...*" as required by the Planning Act 2008 Guidance and did not provide sufficient information to allow informed responses. In our view any application based on it should be rejected on the grounds of inadequate consultation.

We have drawn Gatwick Airport Limited's attention to the above matters but have had no response. We have also informed all Host and Neighbouring Local Authorities of our concerns in this respect and asked them to incorporate our views in their Adequacy of Consultation comments to you in due course.

We are writing to ask you to take these views into account when considering whether to accept any application that may be submitted in due course.

Yours faithfully,

Peter Barclay
Chairman
Gatwick Area Conservation Campaign

CC: Stewart Wingate, CEO Gatwick Airport Limited
Host and Neighbouring Local Authorities ,
Local Members of Parliament Tom Crowley,
Chairman Gatwick Airport Consultative Committee

Campaigning for a better environment for the whole area around Gatwick

GACC, founded in 1968, has as paid-up members over 50 councils and over 40 community groups. We have built a reputation for sound judgement and reliable information and thus have the support of all local Members of Parliament.

Number: 5

Name: CAGNE

Date received: 29 April 2022

CAGNE

**Communities Against Gatwick
Noise and Emissions**

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

29th April 2022

Mr George Harrold
The Planning Inspectorate
Room 3 O/P
Temple Quay House
21st The Square
Temple Quay
Bristol
BS1 6PN

Dear Mr Harrold

Further to your department's presentation at the Gatwick Airport statutory (GATCOM) event on 28th April 2022, we would like to raise the issue of the poor consultation that has been conducted to-date by Gatwick Airport, as part of this DCO consultation process.

As you may not be aware, our umbrella aviation community and environment group for Sussex, Surrey and Kent is prevented from speaking or asking questions of you during the event, as a monopoly by one noise group, facilitated by Gatwick management, prevents all communities from having a fair or geographical balanced voice.

CAGNE has raised with Gatwick Management the lack of transparency and the difficulties faced by residents in accessing the public DCO consultation conducted by Gatwick during December 2021.

The complexity, the number of pages contained in the consultation, incorrect carbon details, and the lack of full details Gatwick management offered, actively helped to prevent residents from participating in the pre-DCO consultation process for the rebuilding of the emergency runway as a second runway.

In view of this lack of open consultation conducted by Gatwick, CAGNE took it upon itself to conduct many public, face-to-face consultation events, offering residents informed individuals to explain the complexity of the consultation offered by Gatwick. As a direct result over 200 cards (over 1,000 were posted to residents) were returned by residents that can be directly contributed to CAGNE. In fact, CAGNE was required to brief Gatwick-employed consultants that could not answer residents' questions at the few, out of the way, events.

This enabled residents to participate in the DCO pre-consultation. Without CAGNE's intervention, we believe that thousands of residents would have been unaware of the process of what Gatwick Airport are proposing, and so would not been able to participate.

We would therefore ask that the planning inspectorate demand that Gatwick Airport re-conduct the pre-application consultation process with full, easy-to-read and easily accessed information, in a form that can be understood by a layman.

We await your response and would like to invite the Planning Inspectorate to a public meeting online to inform residents of the process and how they can engage.

Thank you in advance.

CAGNE Committee

Est Feb 2014

www.cagne.org

cagnetatwick@gmail.com

#pledgetoflyless

www.cagnepcforum.org.uk

Twitter @cagne_gatwick

Facebook CAGNE

Instagram @CAGNE

Number: 6

Name: Ten local authorities

Date received: 26 May 2022



26 May 2022

Susannah Guest and George Harrold
Major Applications and Plans
The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

By email to: susannah.guest@planninginspectorate.gov.uk

Dear Susannah and George,

Re: Gatwick Airport Northern Runway Project – Adequacy of Engagement

We are writing to you as Leaders of the ten Gatwick local authorities, to highlight our concerns about the adequacy of the statutory consultation undertaken by Gatwick Airport Limited (GAL) last autumn, and the manner in which GAL, as the applicant, has been undertaking wider technical engagement with the local authorities to date. Extracts from some of the Local Authority responses to the consultation are included in Appendix A to this letter, flagging concerns about the complexity of materials, our misgivings as to the appropriateness of a predominantly virtual approach to public consultation (s47), and our concerns about GAL's approach to the handling of the technical engagement process and its Topic Working Groups (TWGs).

We initially raised these issues with PINS when we met in June 2021, and following your advice, contacted GAL soon afterwards to emphasise the need for the front-loading of information and the expectation that technical engagement would be an ongoing process of engagement and offline meetings, not just TWGs. We also requested sight of the detailed information in advance of the start of consultation, through the engagement process, in order to ensure we had a shared understanding of the issues arising, particularly should there be any substantive concerns that GAL may have wished to respond to. These points were raised by the local authorities as part of in/formal engagement on GAL's draft Statement of Community Consultation (SoCC), prior to commencement of the statutory consultation process.

The statutory consultation period was extended from 9 weeks to 12, but we are disappointed to advise that little else changed in GAL's approach. Critically, the authorities did not receive any detailed technical information prior to the start date of the consultation despite MHCLG guidance emphasising the need for "*important issues to be articulated and considered as far as possible in advance.*" For the round of TWGs held in late July/early August 2021, some of the slides were circulated a few days in advance but, despite frequent requests, no draft reports or technical information was provided to enable officers to consider the detail prior to discussions with GAL. This approach has significantly undermined the ability of the local



authorities to respond in a fully informed manner, and with the local authorities not having had sufficient sight of GAL's evidence to enable meaningful discussion, this resulted in the TWGs serving only as an "information-giving" opportunity for GAL, rather than an effective means for technical debate and scrutiny. The authorities were presented with the vast majority of the 2000+ pages of technical information only at the start of the public consultation and given just 12 weeks to understand, scrutinise, appoint technical advisers where necessary and respond to it. We do not consider this short timeframe to respond to be reasonable, and it has presented significant challenges in terms of internal governance and elected member liaison for the local authorities. A further round of meetings took place in October/early November 2021, during the consultation period, but follow up to our requests for further information particularly on the noise, air quality and transport topics were either slow to emerge or simply dismissed, with some meetings rushed. This approach has left questions remaining unanswered. When new information was published, this was uploaded to the GAL website without stakeholders being informed of its availability.

The Authorities fully appreciate that this is a complex project, and we want to engage fully in understanding and responding to the detailed technical information so that we can work with the airport to secure the best possible outcomes, including the most appropriate mitigations, for local residents and the surrounding environment. Resources at local authority level are being severely stretched by the Northern Runway Project, and whilst GAL are aware of this challenge, they are seemingly disregarding it by actively limiting their engagement and having expectations that are knowingly disproportionate to what can be achieved. To date, we have felt hampered in engaging effectively by a lack of flexibility, openness and transparency by GAL. This approach is clearly not conducive to achieving the best outcomes.

The local authorities attended an update briefing session with GAL on 16 March 2022. GAL clearly feel that the level of response received on their consultation validates the approach to public consultation they have taken. They have verbally acknowledged the local authorities had raised concerns about engagement, particularly regarding data sharing and the need to disseminate information in a timely manner, and assurance was given that this will change going forward.

An Engagement Protocol has now been issued by GAL, setting out its approach to the next round of approximately 18 TWGs in May, June and July 2022. This includes a commitment to share information with the authorities at least 5 working days in advance of meetings. It is hoped that this will mark a step change in GAL's approach to openly sharing information and willingly discussing and addressing concerns. The authorities are however concerned that their opportunity to be involved with these meetings is constrained by being given limited notice and no flexibility on the dates. GAL had initially sought to limit local authority attendance at meetings to an arbitrary six attendees, although they have now accepted that this is impossible when there are ten impacted authorities. GAL has also now agreed that the councils' consultants can attend these meetings where relevant, which is essential to ensure we can properly engage in an informed manner. Discussions are underway to secure some further funds (Planning Performance Agreement 2) for officer attendance at the next round of TWG, but unfortunately as per the first round of local authority involvement, the funds offered do not come close to the number of hours councils are spending on the DCO, with considerable costs continuing to be picked up by local council tax payers. Although GAL have shifted to allowing all ten LAs impacted by the DCO to attend the TWG meetings, they will only pay the costs for six officers to attend the TWG. The local authorities find the approach divisive and unhelpful. Whilst this PPA gesture is not one required by the DCO promoter, it has added significant distraction and frustration to an already complex process.

Further, early TWGs held to date have shown a picture of evidence that is not yet complete. If the local authorities are able to feed into evidence preparation in a collaborative way, this approach would make sense, but so far it appears that incomplete evidence is simply being presented to the local authorities, which is unsatisfactory and unhelpful to LPA's role in the DCO process. In some meetings GAL have said that detailed matters will be explained in the Environmental Statement rather offering any attempt to discuss and resolve these in advance. This is very unsatisfactory and not consistent with the DCO principle of trying to resolve matters in advance of submission. The authorities also remain concerned that GAL's engagement continues

to be focussed around the set TWGs, rather than a programme of ongoing engagement. Again, it is hoped that there will be increasing engagement with the local authorities on any outstanding detailed matters between the meetings.

Finally, the local authorities have repeatedly asked GAL for the involvement of other stakeholders / statutory bodies, such as the Environment Agency, Natural England, National Highways, and Network Rail, at proposed TWGs and offline meetings through a wider engagement process. Our experience of engagement in other DCO projects indicates that this is normal (not exceptional) practice for stakeholder engagement and led by the promoter. To date, GAL has met with other organisations/agencies separately from the local authorities, whereas other NSIP promoters take a more collaborative approach. Keeping the parties separate has hindered, not helped, engagement. For example, highways changes (to be the subject of formal consultation) were developed by GAL responding to National Highway's concerns; however, highways authorities have technical concerns about the revised approach, which could have been addressed by engaging with National Highways and highways authorities at an earlier stage in the process. Were National Highways and Network Rail to attend the Transport TWG this would avoid duplication and/or overlapping conversations taking place and help to ensure that all the stakeholders are on the same page. Initially GAL advised that statutory consultee attendance would be impractical. However, following further pressure from the LAs, GAL has since (April 2022) clarified that statutory consultees may now attend TWGs, but advise that it is up to the LAs to invite them directly and secure their attendance at the meetings. The LAs will do this, however we consider GAL's approach unhelpful given that they are the promoter and are already in liaison with these organisations and what is now very short notice ahead of TWGs. Again, GAL's approach is adding further pressure to what are already stretched local authority resources.

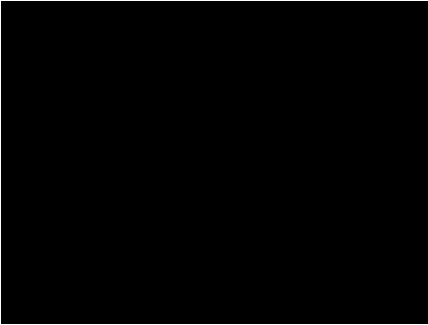
GAL has set out an ambitious programme for their future technical work, confirming they will undertake targeted statutory consultation on the updated highway proposals, giving all parties just 28 days in June 2022 to respond to their proposed changes to the Highway Concept Design. They also suggest this brief time period will be when they publish refined project proposals to seek informal feedback as a wider non-statutory consultation. The councils had been given 9 working days (by 16 May) to respond to these latest consultation proposals. We will be questioning whether the refined project proposals, which we understand include key matters such as a new car parking strategy, revised locations for office and hotel provision, new flood alleviation schemes, the chosen location of the CARE facility, and biodiversity, should also be subject to statutory consultation. It is vital 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.

More broadly, it is unclear whether GAL will be undertaking further focussed consultation to address other technical matters outstanding from the first consultation, including employment land requirements, noise, and revised UK Government carbon values (September 2021). We will certainly be suggesting full consultation on all revisions to the scheme and any new evidence should be presented. We will also be questioning whether it is appropriate for a round of TWGs to take place in the same period as a hybrid statutory/non-statutory consultation is taking place. PINS' views on GAL's proposed approach to its scheme update consultation, and if necessary providing a steer to GAL, would be appreciated.

We are strongly of the view that improvements to GAL's engagement and joint working approaches are required as a matter of urgency. We note that ongoing discussions are taking place on all the other detailed technical areas for this DCO, and we remain hopeful that GAL will take a more pro-active approach to its

engagement. We will contact PINS again in due course if the revised approach to engagement promised by GAL is not delivered.

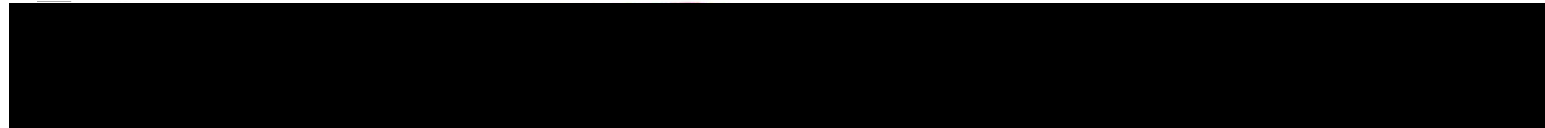
Yours faithfully,



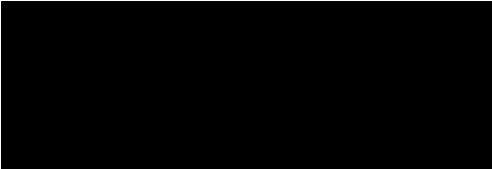
**Councillor Jonathan Chowen
Horsham District Council**



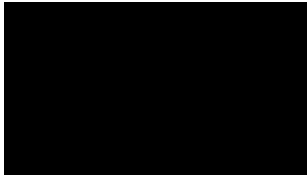
**Councillor Jonathan Ash-Edwards
Mid Sussex District Council**



**Councillor Stephen Cooksey
Mole Valley District Council**



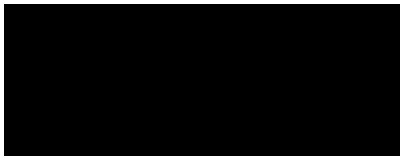
**Reigate & Banstead Borough
Council**



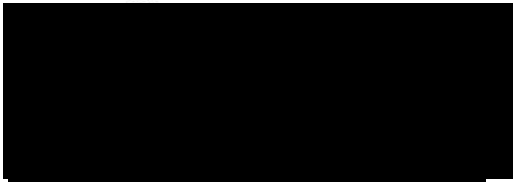
**Councillor Catherine Sayer
Tandridge District Council**

**Councillor Paul Marshall
West Sussex County Council**

**Councillor Keith Glazier
East Sussex County Council**



**Councillor Tim Oliver
Surrey County Council**



**Councillor Roger Gough
Kent County Council**

ENDS

Gatwick Airport Northern Runway Project DCO – Adequacy of Engagement**: EXTRACT OF LOCAL AUTHORITY S42 & S47 RESPONSES RE - ADEQUACY OF CONSULTATION**

This Appendix sets out extracts from Local Authority s42 PEIR responses to GAL where concerns have been raised by the councils in relation to matters of consultation and engagement undertaken by GAL. We also include text where requests have been made via our responses asking that GAL share with us outstanding evidence that was not available at the time of s42 consultation. More broadly, reference is also made to the effectiveness of public consultation (s47).

Where possible, paragraph numbers are retained from Local Authority representations to assist should PINS wish to refer to the text provided in its original context.

CRAWLEY BOROUGH COUNCIL**S42 Cover Letter**

Overall, the LPA has significant concerns about the project as detailed in the PEIR. There is a general lack of detail 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.

We also have concerns about the lack of tangible engagement with the LPA and its neighbours prior to the commencement of this consultation with little opportunity to discuss in advance technical methodology or options and alternatives for the proposal. The scheme has been very much ‘presented’ to us with only limited information and input from key stakeholders before the 12 week consultation period. This is a hugely substantive project with a large volume of documents and only a relatively short time to consider information has been provided. 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. While we recognise that the Topic Working Groups have assisted the process of engagement, given the scale of the PEIR, with its numerous supporting appendices and documents, it has proved to be a significant challenge to comprehensively respond to this process of consultation. 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. We welcome future opportunities to engage directly with GAL and its technical teams in the months following the close of the pre-application consultation.

Context and Overview

- 1.3 Beyond the administrative boundaries of CBC, there is a recognition of the regional significance of the Project. Consequently, Crawley Borough Council as the main host authority will support and provide leadership to a Joint Program Board through which the ten Gatwick authorities¹ aim to provide a co-ordinated response to GAL during subsequent phases of the submission of the DCO application. However, given the short timescales for the current statutory consultation of 12 weeks from September it has been necessary to submit responses separately by Authority.

Chapter 3: Need and Alternatives Considered

- 3.2 The Need Case, as currently set out, is very generic, relying on general Government statements about shortage of airport capacity and the benefits of expansion, including airports making best use of their existing runways. It also relies on Gatwick being virtually full prior to the pandemic and the implications that had for resilience and delays. Although none of these points are disputed, the Consultation Documents, in particular the sections on the capacity with and without development and on the demand forecasts, lack sufficient cogent detail to validate the Need Case. This will require to be addressed before submission and, to the extent that the validation of capacity with and without development and the demand forecasts underpin the assessment of impacts, will require further explanation to ensure that the impacts of development are properly understood and assessed. It seems imperative that GAL engages on these topics as a matter of urgency so that the impact assessments within the PEIR can be appropriately validated.

Chapter 7: Historic Environment

- 7.2: CBC wish to comment that no meaningful consultation has taken place in relation to the methodology and information for this chapter since the Scoping Opinion comments were provided. Information has been 'presented' on two occasions but other than brief questions, there has been no active dialogue with the Council on heritage matters.

Chapter 8: Landscape, Townscape and Visual Resources

- 8.2 The work on this aspect of the PEIR has reached this stage without any further meaningful consultation with CBC following its comments on the Scoping Response. This is particularly disappointing given the specific concerns raised about views at that stage and the explicit advice of PINS to agree methodology and extent of study area with the relevant consultees. On 29th July 21 GAL provided a very brief overview of what would be in the PEIR, giving only limited time to view slides and understand content. While questions were raised relating to methodology, Pentagon Field, viewpoints and impact on Horley it does not appear that this has been included in the PEIR as published. The acknowledgement in the document that further viewpoints can be added is welcomed and CBC would welcome the opportunity to have a more constructive dialogue outside of the formal consultation timelines.

Chapter 11: Water Environment

- 11 (c) No recommendation can be made at this stage until the full fluvial and pluvial flood risk mitigation strategy has been submitted for consultation. CBC requests early engagement as this is developed.

Chapter 13: Air Quality

- 13.2 The Topic Working Groups for Air Quality and Transport/Surface Access were rushed and in some cases over-ran or were incomplete. The Air Quality TWG was combined with Carbon/Climate Change which were two large topic areas covered by separate PEIRs and as a result did not provide the opportunity for proper examination of the presented information, or sufficient time for questions and discussion.
- 13(a) The local authority found the TWGs were in the form of presentations, rather than working groups and lacked meaningful engagement. The local authority would welcome a more deliberative approach and suggests presentation material is provided in advance of the TWGs so that issues raised can be properly addressed at the TWG.
- 13(b) The local authority would welcome earlier engagement and more timely responses to points raised to ensure their consultation feedback can specifically address key issues in consultation document.
- 13.4 Not all evidence relating to the air quality impacts associated with the proposal are included in the Air Quality PEIR/ Appendices. Information is spread across a large number of other PEIR Chapters and appendices, making it difficult and time consuming to identify and evaluate. Over 19 documents required assessing and cross referencing in order to fully consider the air quality impacts of the

proposal. Even then, a lot of evidence was missing and requests for data sets and source apportionment files took weeks to be provided. As a result, the consultation lacks transparency which has made evaluating the PEIR more difficult and restricted the local authority's ability to respond in the comparatively short time timescales.

- 13 (c) Where information necessary to consider the air quality impacts of the proposal is not provided within the main document or appendices, the local authority would welcome links to relevant supporting information. This will improve the quality and transparency of the application consultation process.
- 13.5 The PEIR assessments have generated more detailed questions and requests for clarification and information, much of which should have been readily available and supplied upfront. However, whilst GAL has welcomed and encouraged questions to be forwarded to them, they have been slow to respond, or have promised responses in the follow-up TWGs, which were repeatedly postponed. To give examples: requests for data sets, model input/output files and source apportionment took five chase up emails before files were finally provided on 15 Oct 2021, five weeks after the initial request. Even then, information was missing and further data arrived on 27/10/21 (six weeks after the original request). Responses to detailed technical questions raised on 02/10/21 were not responded to for another four weeks until the follow up Topic Working Group on 04/11/21. Feedback to issues raised at the 04/11/21 TWG were not received until 23/11/21, one week before the end of the consultation period. The delays in supplying information needed to allow proper scrutiny of the PEIR assessment within the consultation timeframe, raises concerns about the openness and adequacy of the consultation process.
- 13 (d) The Local authority would welcome full information and data files that underpin the air quality assessment of the ES being provided in the appendices or, where this is not practical via links to the relevant datasets so that all evidence is transparent and readily available for scrutiny. The Local authority would also welcome prompt responses to requests for further information and data.

Chapter 14: Noise

- 14.2 The PEIR consultation documents and supporting evidence have only been provided in electronic format downloadable from the Gatwick airport website. As the files had no meaningful description on download they have needed to be renamed on download. Given the considerable number of documents this was time consuming and delayed consideration of the proposal. 14.3 Having catalogued the information it became clear that not all information has been provided. Evidence was absent, for example, the background noise report

conducted in 2016, the release of which was declined as part of the PEIR consultation at the second Topic Working Group.

- 14.4 Requests for information have not been responded to in a timely fashion. It has been necessary to make repeated requests for noise exposure contours which are essential for the assessment of air noise impacts. The files were only released to the local authorities after repeated requests and four weeks having elapsed. Once released, the files were incompatible with local authority systems and had to be reprocessed to what we understand to be the original format by GAL, which is the one compatible with most local authority GIS. The data, once supplied, contained inconsistencies in nomenclature resulting in confusion and the need for further enquiry.
- 14.5 Information about noise is dispersed throughout the PEIR Chapters, Appendices, Figures and “Other Documents” and has therefore been difficult to identify and respond to. Recommendation
- 14 (a) GAL should ensure that any and all documents relevant to the consideration of the Environmental Statement are supplied promptly, properly curated and in a format that facilitates processing of the information by the receiving parties. Topic Working Groups
- 14.6 The Council would expect a “Topic Working Group” to be a group that is presented with information, given the opportunity to convene and work through issues that emerged as a result of evidence review, discussion, investigation and identify solutions.
- 14.7 The Topic Working Groups did not achieve this. Although there was improvement between the first and second topic working groups, there was limited opportunity to discuss the project. Information was presented to the authorities, and on occasion it is considered that some responses, provided by GAL to questions raised by the councils, were not correct.
- 14.8 Officers are also concerned that GALs summary of the outcome of the Topic Working Groups were contrary to the views of the attending officers. Officers note that recordings of those meetings by GAL have not been made available to the attendees despite being requested to do so. There is no agreed record of the minutes of the events. This is a significant concern. Should these be used as part of Gatwick’s evidence base, they will need to disclose these. Disclosure at an early stage will assist all parties involved in the process.
- 14 (b) That GAL commences early and meaningful engagement with the joint authorities in relation to the Environmental Statement and that programme and

timescales for processing and responding to the consultation are agreed with the joint authorities.

HORSHAM DISTRICT COUNCIL

Effectiveness of Engagement through the Statutory Consultation

- 1.1 It is acknowledged that there will be an opportunity for the Council to provide feedback on the effectiveness of GAL's engagement with the public and other stakeholders through the Adequacy of Consultation Representation that the Council will be asked to provide to the Planning Inspectorate (PINS). However, we have always stated our intention to work positively with GAL and to provide feedback in an open and transparent way. In this spirit of constructive working, we consider it is important to raise these issues direct with GAL at every opportunity, not just with the Planning Inspectorate at a later stage of the DCO process. Through the Council's response to the Draft Statement of Community Consultation (SoCC), the Topic Working Groups and through communication via our lead Member representing the Council at GATCOM, we have already raised concern regarding the effectiveness of the consultation.

- 1.2 In light of the concerns set out in paragraphs 6.11 to 6.14 above regarding impacts on Horsham residents and businesses, of particular concern to the Council is the lack of face-to-face events and publicity exercises in public spaces. The Council is cognisant to the challenges of organising consultation activities in a pandemic situation. However, when we provided formal feedback on the Statement of Community Consultation (SoCC) the UK Government had a clear Roadmap out of Lockdown¹ and the consultation was scheduled at a time when all legal limits on social contact would have been lifted, thereby meaning no limit to the number of people allowed to mix in public spaces. We are therefore disappointed that there have been no face-to-face public events (with the exception of four brief visits of the Mobile Project Office to the District) that would have allowed stakeholders and members of the public to speak directly to GAL staff about the airport expansion proposals. It should also be noted that the Council has received notification of similar concerns from other stakeholders in this regard, details of which will be contained within our AoC representation.

¹ [COVID-19 Response - Spring 2021 \(Summary\), Roadmap out of lockdown, www.gov.uk](#)

- 1.3 Further to this, there is also concern around the virtual exhibition and the quantity of material. Whilst the virtual exhibition is informative, the exhibition boards are very heavy on text and it is not clear (without clicking) what each exhibition board is about, making it inaccessible. It is also not obvious whether the exhibition boards can be downloaded and read at the consultees' convenience. This results in the room being inaccessible and consultees are not able to get through the whole suite of material as there is too much content on the exhibition boards. **The Council therefore requests downloadable copies of the exhibition boards. We also consider that less text should have been displayed in order to make the exhibition boards more accessible and easier to read.**

The Mobile Project Office

- 1.4 Given the lack of opportunities for members of the public to speak to GAL staff face-to-face, there was at least the promise of a Mobile Project Office (MPO) that was scheduled to visit the District on four separate occasions. However, the provision of the MPO has been disappointing for a number of reasons. Firstly, GAL 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.
- 1.5 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 and below are some pictures of the MPO on a visit to the District.





Mobile Project Office in Horsham Carfax



Source: CAGNE / Warnham Parish Council

- 1.6 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 is no signage on or surrounding the van.
- 1.7 The Council is also disappointed that our advice on the locations for the siting of the MPO were initially ignored. In the Council’s feedback to GAL on the draft SoCC on 28 May 2021, we advised that the Carfax in Horsham town 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 chose to ignore this advice and events were arranged for Waitrose car park. Within the first few days of the launch of the consultation 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 GAL to arrange replacement locations.
- 1.8 **Without prior knowledge of the MPO visit and considering that the published MPO schedule was inaccurate within the first few days of the consultation, the Council considers that the MPO has failed to properly alert members of the public to the consultation. Given these issues the Council is very concerned that there is less awareness of GAL’s expansion plans among Horsham District residents and businesses.**

Lack of clarity over Hard-to-Reach groups

- 1.9 In the Council’s response to the draft SoCC issued to GAL on 28 May 2021, we recommended that the SoCC be 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.

- 1.10 The SoCC sets out that “...mobile project office visits, alternative format materials, advertisements in specific publications, or additional support for those who cannot travel, have limited or no internet access, or who need help to read and understand documents. We will also provide a range of communications channels for anyone seeking information or answers to their questions about our proposals.”
- 1.11 It does not give specific contact details for requesting materials in other formats, how Mobile Project Office visits can be organised, where adverts are being placed or how people can request support. It also does not list what 'range of communications channels' it is using to reach these groups - it simply says that there are some.
- 1.12 The Council is concerned that hard-to-reach groups will not be adequately involved in the consultation process and therefore unable to comment on the proposals. **We therefore request further detail from GAL to demonstrate how these groups have been engaged throughout the consultation process.** As we have highlighted in responses on the draft SoCC, Gypsies and Travellers are one of the identified hard-to-reach groups in the District and can be sensitive to noise, given the location and nature of their accommodation. There may also be indirect impacts if noise impacts lead to relocation to unauthorised sites in the District.

Demonstrating adherence to the Planning Act 2008: Section 47 and 48 Notices

- 1.13 The Planning Act 2008 sets out that a S48 notice which publicises the proposed DCO application should appear once in a national newspaper, once in the London Gazette and for two successive weeks in local newspapers. Usually, a SoCC would outline the newspapers that will be used but the GAL SoCC simply says “statutory notices will be published in line with Section 48 of the Planning Act”. **Without this information, it is unclear how GAL is meeting the requirements of S48 of the Planning Act 2008 therefore the Council requests evidence of the S48 notices in the requisite newspaper publications.**
- 1.14 The Planning Act 2008 also sets out that a S47 notice which sets out how the applicant proposes to consult must be published in a newspaper circulating the vicinity of the land. The SoCC does not outline whether this has been done. Again, without this information, **it is unclear how GAL is meeting the requirements of**

S47 of the Planning Act 2008 and we request evidence of the S47 notice in at least one newspaper in the vicinity of the scheme.

Effectiveness of Engagement with the Local Authorities

- 1.15 In its SoCC, GAL committed to undertaking reasonable requests for virtual briefings from stakeholder groups. The Council welcomed this opportunity to brief Local Members and parish and neighbourhood councils within the District and we are grateful to GAL for meeting our request, as we know GAL has done for numerous other local authorities.
- 1.16 Whilst we consider that GAL has provided sufficient opportunities to brief community representatives, such as district and parish councillors, there is concern around the opportunities officers are being afforded to fully digest, interpret and assess the proposals. This is a particularly important part of the process due to the technical nature of, not only the NRP and its supporting evidence base, but also the DCO process itself. **The Council also wishes to highlight that the consultation documents in general are difficult to navigate, principally due to the large amount published with limited time to review, but also with the Figures & Drawings and Appendices separated out from the technical chapters which makes cross-referencing very challenging and time consuming.**
- 1.17 As highlighted in paragraph 1.5, there are 10 local authorities proactively engaged in the DCO process and representatives from these authorities form the Gatwick Officers Group that attend the Topic Working Groups that GAL organises to engage officers from across the local authorities on technical matters on a variety of key topics.
- 1.18 These Topic Working Groups have been created to disseminate information to the local authorities and to provide a forum for officers to engage with GAL staff and supporting consultants working on the Northern Runway Project. Initially, Topic Working Groups were held in 2019 before GAL paused the NRP as a result of the pandemic. These Topic Working Groups recommenced in 2021 and opportunities for officers to attend these virtual groups took place prior to the consultation and during the consultation.
- 1.19 The Council would like to share some concern about the nature of the Topic Working Groups. As defined, the title suggests that the events are much more

interactive than they actually are. With the exception of the presentation slides shared immediately before the Topic Working Groups, there has been no evidence base studies shared with the Councils prior to these events. This includes the Consultation documentation which constitutes circa 2,000 pages which the local authorities only had sight of at the launch of the consultation on 9 September 2021.

- 1.20 The Topic Working Groups are information-laden two-hour virtual meetings, often with an overwhelming amount of detail shared with officers that provide little opportunity to digest the information and form cogent opinions. **It is noted throughout the consultation documentation that reference is made to the Topic Working Groups held in 2019 and the fact that officers provided “no detailed comments” at these events. The Council wishes to highlight that this is because officers did not have time to review the information prior to the Topic Working Group, rather than any lack of desire to provide feedback.**
- 1.21 GAL has undertaken a series of follow-up Topic Working Groups throughout October and into early November during the consultation, which have been welcomed. However, many of these events have been scheduled, cancelled and then re-scheduled which has implications for officer time, particularly during a limited period of consultation in which officers are tasked with preparing the Council responses.
- 1.22 GAL has asked for questions to be provided in advance of each of the Topic Working Groups and crafted answers are provided at the meetings through a series of slides, with concerns raised by the local authorities often rebutted or dismissed. Requests for further information, particularly the technical supporting evidence base for the Noise and Air Quality topics, have been difficult and slow to access, which affects the local authorities’ ability to engage in providing meaningful feedback to GAL to help shape the proposals.
- 1.23 The Council is concerned that the engagement that is taking place with the local authorities is limiting our ability to input effectively into the pre-application process. Paragraph 15 of the Department for Levelling Up, Housing and Communities’ (formerly DCLG/MHCLG) Guidance on Planning Act 2008: Guidance on the Pre-application Process² states that *“effective pre-application consultation*

² [Planning Act 2008: Guidance on the Pre-application Process](#), Department for Levelling Up, Housing and Communities (formerly DCLG at the time of publication)

will lead to applications which are better developed and better understood by the public, and in which the important issues have been articulated and considered as far as possible in advance of submission of the application to the Secretary of State.” GAL will be aware that during the Surface Access Topic Working Group on 5 November 2021 the Council requested additional time to respond to the consultation in light of some of GAL’s supporting evidence³ being published part way through the consultation, but this was refused without sufficient reason.

- 1.24 The Council is concerned that GAL’s current approach is to control the narrative, and this may have unnecessary and potentially unfair implications for the communities that are affected by the proposals, in whom the local authorities represent, but also the NRP and potentially the progress of the application to the timescales that GAL intend to bring the NRP forward. It is critical that local authorities are afforded sufficient time to review, interpret and assess GAL’s evidence base to provide meaningful engagement.

Involvement of Statutory Consultees

- 1.25 In the Council’s response to the Scoping Report issued in September 2019, we strongly considered that statutory consultees such as the Environment Agency, Natural England, National Highways and Historic England should be involved in the Topic Working Groups. To date this has not been the case and we would urge GAL to ensure that key statutory consultees are involved in these meetings moving forward to ensure that key issues can be identified, discussed and addressed cohesively during this important pre-application stage.

Resourcing Implications for the Local Authorities

- 1.26 As already highlighted, the consultation documentation amounts to some 2,000 pages of highly detailed, technical information which is complex and could be challenging for members of the public to understand. Local authorities play a crucial role in representing their local communities, particularly understanding and assessing the evidence base. This requires sufficient funding to support the local authorities through this process and to undertake further work to identify appropriate mitigation measures and suitable infrastructure required to fully address the impacts of airport expansion. **The Council considers that there needs**

³ Appendix A Uncertainty Log added to PEIR Appendix 12.9.1, the Preliminary Transport Assessment Report Part 4 added on 1 November 2021.

to be a longer-term funding agreement through to Examination and to support local authorities in meeting the discharge of the DCO requirements.

- 1.27 For some time, negotiations to put in place a Planning Performance Agreement (PPA) have been taking place between GAL and the local authorities. To date, a PPA has not been agreed, although we believe agreement is imminent which will help to relieve the considerable pressure on all local authorities and to ensure that our contribution can be maximised.

MID SUSSEX DISTRICT COUNCIL

General

- GAL has not adequately and effectively consulted on the proposal
- As a consequence of GAL not actively and constructively engaging, the Council's ability to effectively respond on behalf its residents and local businesses to this consultation has been comprised. Going forward this Council expects GAL to work constructively with Councils, including during the preparation of Statements of Common Ground and S106 agreements. This will be critical to ensuring that the impacts of the NRP are properly mitigated and supported by the necessary infrastructure, to ensure that the residents of Mid Sussex are not adversely impacted, if the project is permitted by the Secretary of State.
- Prior to the start of the consultation GAL was very vague about the start date. It is unlikely that GAL did not know exactly when the consultation was due to start, prior to the publication of the SoCC. Therefore, it is assumed that GAL intentionally made it difficult for Councils to collaborate and plan their resources.
- The Council welcomed GAL's agreement to extend the consultation period to 12 weeks, this has still proved to be very challenging to enable proper consideration of the volume of technical information contained within the consultation documents (running at over 1,500 pages in just the main report). It is acknowledged that GAL held a series of Topic Working Groups in early August 2021 to present information to local authorities. However, the format and content of the sessions made it very difficult for meaningful discussion of the issues to take place. A large amount of technical information was presented to the group, but copies of the information shared were not made available either before or after the sessions, despite local authorities requesting it. It is disappointing that GAL did not make the documents available to local authorities ahead of the formal consultation period.

- In order for the engagement with the community to be meaningful GAL should have taken a more proactive approach to engaging with the community than the 'on request' basis they adopted. The 'information collection point' provided through the Mobile Project Office (MPO) does not provide the same opportunity for the public to engage in the process as 'face to face' engagement. In addition, the time the MPO was available was limited to working hours only. No sessions were available at lunchtimes, evenings or weekends. This restrictive time period has limited the local communities' ability to constructively engage in the consultation process.
- The location of a MPO at East Grinstead (3 sessions), Haywards Heath (1 session) and Burgess Hill (1 session), was also disappointing due to its limited coverage across the District. Furthermore, despite requests GAL were not willing to accommodate sessions at Crawley Down or Copthorne. The proximity of these villages to the airport means they are potentially the most directly impacted by the proposal and therefore the failure to agree to MPO sessions in these locations is a critical failure of process on the part of GAL.

Comments on the Statement of Community Consultation

- The Statement of Community Consultation (SoCC) sets out how GAL will engage local Councils and communities during the consultation process. The SoCC was published on the 25 August 2021, with consultation starting on 9 September (only 2 weeks later). As a consequence, there was inadequate notice of the start of the consultation period.
- This was the first opportunity for the Council to see whether its comments made on the adequacy of the SoCC had been considered. Whilst some had been, there are a range of outstanding concerns with the consultation process which are set out below.

MOLE VALLEY DISTRICT COUNCIL

Consultation and Engagement

Through Mole Valley District Council's (MVDC's) response to the Draft Statement of Community Consultation (SoCC) and the Topic Working Groups, MVDC has already raised concerns regarding the effectiveness of the consultation.

The local authority raised this as an issue and made suggestions in its draft SoCC response dated 27 May 2021. However, MVDC are disappointed that many of the issues highlighted by this Council and other local authorities remain unaddressed. A key

concern in MVDC's SoCC response was the lack of any in-person consultation. At that time, it was recognised that due to COVID-19 it was impossible to know what Government restrictions and social distancing measures would be in place. However, the s42 consultations were entirely virtual engagements despite eased COVID restrictions. It is the belief of the Council that GAL should in future include proposals to consult face-to-face with the local community through the type of event that was planned in the February 2020 iteration of the SoCC.

The extension to the consultation period to 12 weeks was welcomed, however, due to the lack of upfront information sharing by GAL and the volume of technical information, it was challenging to engage the relevant external expertise and consider all of the information within this time-frame. Whilst Topic Working Groups (TWGs) were held before the consultation, the local authority found the TWGs were purely in the form of information presentations, rather than dialogue-led TWGs, and so they lacked meaningful discussion and engagement. MVDC suggests presentation material should be provided well in advance of the TWGs in future so that informed issues and questions can be raised by local authorities in the working groups which can then be properly addressed by GAL in the TWGs.

Further TWGs were held in October and November of 2021 during the public consultation itself. Some of the TWGs were cancelled and rearranged, which impacted on officer time, particularly at such a busy and critical point of the s42 consultation process when officers were trying to finalise Council responses.

MVDC is aware from other DCO projects, such as Rampion in West Sussex, that the promoters are known to share information at a much earlier stage so that informed questions and discussions can be had between the relevant parties.

Mobile Project Office

MVDC considers that the Mobile Project Office (MPO) was not an effective or meaningful method of community engagement and did not adequately replace in-person events. This was something MVDC raised as a concern in its May 2021 response to the draft SoCC. It was disappointing that the MPO in Dorking was positioned in the car park at the rear of Dorking Halls in an inconspicuous location and there was no signage to members of the public. In addition, the MPO acted as an information collection point only, with no actual engagement with GAL staff. The MPO did not provide any opportunity to answer technical questions for members of the public turning up.

Hard-to-Reach Groups

Within MVDC's response to the draft SoCC, it was pointed out that MVDC welcomed the commitment to engage with hard-to-reach audiences but more detail should be included as to the types of groups that GAL would typically consider would be harder-to-reach, and how they would be specifically targeted through the consultation. Within

the SoCC dated August 2021, which GAL made public ahead of the public consultation, MVDC was disappointed to see that this particular section of the SoCC had not been expanded upon. Given the lack of clarity that still remains as to how the hard-to-reach groups were engaged in the consultation, MVDC remains concerned that these groups in particular may not have been given a fair opportunity to be involved and to comment on GAL's proposals.

Funding

MVDC, in addition to other local authorities involved in the Northern Runway Project (NRP), is mindful of the volume and complexity of the consultation documents. Local authorities had to assimilate the consultation information within a very short timescale, with very little pre-consultation engagement from GAL prior to the consultation commencing. Given the resource intensive nature of the NRP work, it is considered that there is currently an inadequate level of funding in place to support local authorities with this on-going work.

Air Quality Chapter of the PEIR

Regarding Chapter 13 (Air Quality) of the PEIR, there were major concerns with the consultation process and the length of time it took GAL to submit air quality modelling files which were missing at the beginning of the consultation. In total, it took GAL over six weeks to provide the requested files from the original request, limiting the time available to look at the data to meet the deadline.

TANDRIDGE DISTRICT COUNCIL

Consultation overview

Table 1.1 and 1.2 – Information provided is not entirely correct. Furthermore, Lingfield library was not included on the deposit locations list and this could have had an influence on the number of the community that engaged. Further, this list did not initially include Burstow as a location for the drop-ins, but it was added later following challenge from local representatives. However, disparity between the locations visited clearly exists and despite Tandridge being directly adjacent to the airport, it was not prioritised while other, less associated locations, including Brighton and Royal Tunbridge Wells, received multiple visits. Therefore, it is felt that this consultation has not been particularly inviting. Aside from the aspects of online consultation raised regarding the Statement of Community Consultation, GAL has been reluctant to allow the recording of meetings, which would benefit stakeholders in sharing the process and in compiling responses. Further, the information available at the travelling drop-ins has received criticism from some wishing to engage as those on hand at the drop-ins were not able to assist. Instead interested parties were directed to a phonenumber for more technical

assistance which does not present an accessible consultation and is not considered to be acceptable.

Page 12 – Map. Environmental mitigation measures appear to be negligible in comparison to the size and scope of the scheme.

Page 20 – Concerns are raised regarding the ability of GAL to present a reliable picture of noise impacts when the FASI-S programme still isn't determined. The cumulative impact could be significantly worse for those impacted. We appreciate that this consultation is about the northern runway specifically, but it is arguably misleading and only half the story.

General – There are several sweeping statements made throughout the summary document and by default the wider consultation, these should be clarified and substantiated where necessary. These particularly relate to: the impacts on highways beyond the M23, namely the M25, A22 and A264; the lack of regard to the impact on housing, how any generated demands will be met, and the constraint placed on home ownership by the lack of affordability. We also note a comment at 8.11.51 which refers to re-housing residents while noise mitigation is undertaken, yet no reference to where this temporary accommodation will be. In an area with a restriction on available homes, further detail and plans for this should be shared.

Chapter 8: Landscape, Townscape and Visual Resources

General – This chapter is particularly difficult to navigate, entirely impenetrable in places and not considered to be user friendly. It is appreciated that there is a great deal of technical information, but if it cannot be properly interrogated by interested parties, it raises questions around whether it is effective in presenting landscape considerations.

Outline Employment, Skills and Business Strategy

2.2.5 - The Appendix for this section groups the attendees at all meetings held in 2019, 2020 and 2021. We would like clarification on the attendees at each stage of the round table meetings and group discussions. Formal recordings of minutes from each of the meetings would help to provide an overview of the key discussion points from the meetings.

TDC Appendix A – Comments submitted by the Mole Valley Environmental Health Team on Chapter 13 and Chapter 14

Chapter 13: Air Quality

A request to GAL for the air quality modelling files that underpin the PEIR including source apportionment data was made following the publication of the PEIR on 13th September 2021. The files requested did not require additional work by GAL but were simply data that would have been produced for the PEIR documents. A series of 'chase'

emails were made over the subsequent weeks and the data finally arrived on 15/10/21, just under 5 weeks after the original request was made, which has limited the time available to look at the data and meet the consultation deadline. Further data which was 'missed' from the original data set arrived on 27/10/21 (just over 6 weeks from the original request).

SURREY COUNTY COUNCIL

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.

The council feel that insufficient technical information has been provided by GAL in advance of publication of the PEIR. This has made consideration of the huge amount of PEIR information during the consultation period more difficult. In a number of areas, the level of information provided within the PEIR has been insufficient to fully assess the impact of proposals. Our consultation response sets out the areas where we feel further detail is required. We request that this information be made available prior to the DCO submission.

We also expressed concerns in our response to the Statement of Community Consultation that GAL were pursuing an unnecessarily constrained approach to stakeholder engagement with too great a reliance on virtual engagement for this important statutory consultation stage of the DCO process. We have had anecdotal reports of confusion around the function of the mobile project office, with residents expecting to be able to have detailed discussions at these. Any further engagement with local communities and stakeholders should include a much greater face to face element.

A great deal of further technical work is required in relation to transport modelling, including additional junction modelling, sensitivity testing and further details on assessment criteria. Further technical work is also required in areas such as heritage, landscape and visual impact, flood risk and drainage to inform the Environmental Statement. The council's involvement in ongoing work is requested.

We are concerned that GAL has simply presented its preferred option for a noise envelope with no prior engagement with representatives from local communities, local authorities and other stakeholders in its design contrary to best practice. A design group needs to be set up to test options. Independent scrutiny and enforcement of the noise envelope needs to be addressed.

SCC owns land within the proposed scheme boundary, namely the council's land holdings at Bayhorne Farm and Gatwick Dairy Farm in addition to land within the adopted SCC highway and non-adopted highway verge land. As an affected landowner, we feel that engagement to date has been lacking, and the level of detail included in the consultation material is insufficient to be able to fully consider the implications and provide comment. Only as of early November has further detail been provided to answer fundamental questions relating to timescales for land take and the category of land acquisition. This information is not easily available within the consultation material published.

We therefore require GAL to:

- Provide more technical detail on access arrangements for the surface access construction compound at Bayhorne Farm
- Commit to further detailed engagement regarding access aspects as a matter of urgency.

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 request that this further information is made available prior to submission of the DCO application.

WEST SUSSEX COUNTY COUNCIL

Although the Planning Act 2008 is not prescriptive, the spirit of the Act is about front-loading the DCO process and early engagement by applicants with stakeholders and others. Unfortunately, GAL has not engaged with the County Council (and other Gatwick local authorities) in a positive and proactive manner during the development of the NRP over the past 2.5 years. Although some general information was shared with officers in late 2019 and early 2020 before work was paused due to the COVID-19 pandemic, GAL has not shared any background studies and there have been no opportunities for officers to inform evidence gathering or to contribute to it since work on the NRP formally restarted in January 2021. The only area where GAL has formally engaged with the County Council is in seeking comments in spring 2021 on its draft SoCC.

Given the lack of pre-consultation engagement by GAL and the large number and length of the consultation documents (and, in some cases, the absence of key documents), it has been difficult for officers to fully evaluate the PEIR within the time available.

Technical Engagement

The County Council notes that MHCLG guidance on the pre-application stage of the DCO process emphasises the benefits that the early involvement of local authorities (and communities and statutory consultees) can bring. Therefore, it is concerned that there has been insufficient technical information provided by GAL in advance of publication of the PEIR and insufficient time for officers to challenge and scrutinise the assumptions and evidence base ahead of formal consultation.

Overall, there has been a lack of engagement by GAL during the development of the NRP and, therefore, the County Council and other stakeholders have not been given the opportunity to provide meaningful feedback to influence the proposed development. Going forward, the County Council expects GAL to take advantage of the wealth of knowledge and understanding of their areas that local authorities can bring to the development of the NRP (should it proceed).

Community Engagement

Concerns are raised with regard to GAL's reliance on digital formats and a lack of face-to-face meetings with the community, particularly given the complex nature of the proposals. This will be monitored through the consultation period and any local concerns raised will be documented as evidence for inclusion in the County Council's post-submission Adequacy of Consultation response.

Assessment of Alternatives

Since the development of the proposals, there have been limited opportunities for stakeholders to influence the design, prior to the PEIR being published. The County Council wants to see further mechanisms to allow the proposals to be understood and scrutinised prior to the DCO application being submitted.

Therefore, the County Council will continue to engage with GAL in the coming months to understand the data and underlying assumptions, to seek to influence the remaining design elements, and to mitigate concerns about the potential adverse impacts presented in the PEIR. This dialogue will enable the best possible outcomes for the local communities and other sensitive receptors in West Sussex that would be most affected by the construction and long-term operational impacts of the NRP. It will also enable GAL to prepare a robust Environmental Impact Assessment (EIA) and application for development consent.

KENT COUNTY COUNCIL

We welcomed the opportunity to comment on GAL's Draft Statement of Community Consultation (SoCC) in relation to the DCO application for the northern runway proposals. The County Council previously raised concerns within an informal response to

the SoCC in March 2020, which unfortunately remained unaddressed when the revised version was shared for formal comment under section 47 of the Planning Act 2008.

In response to the SoCC, Local Authorities around the Airport repeatedly raised concerns regarding the proposed length of this consultation and requested the full twelve-week period was given to allow members of the public to fully digest all the information provided and for Local Authorities to adhere to necessary governance processes. It is positive GAL has taken this feedback on board and allowed the full twelve-week period for responses to be submitted.

Despite a lack of information within the SoCC regarding the proposed locations and times for the Mobile Project Office (MPO), KCC was pleased to see a number of MPO events held in Kent. These consisted of five events in total; three in Edenbridge and two in Tunbridge Wells. The consultation was primarily online due to the risk of Covid-19, though consultation materials were made available at Tunbridge Wells Library and Edenbridge Library for those who were unable to access the materials online.

It is disappointing there was a lack of detail within the consultation material in relation to a number of the PEIR chapters, but as a neighbouring authority, the County Council would welcome the opportunity to continue working with GAL as the DCO application progresses and will continue to review further documentation submitted as part of the process.

It is understood the intention is for the consultation report to be made available as part of the DCO application. However, should the timescales for submission alter, KCC would ask for the consultation report to be published separately to ensure Local Authorities and the public can be informed of the outcome of the consultation. This should include a 'You Said, We Did' format so that all parties can track the specific actions taken as a result of their participation in the consult.

ENDS

Number: 7

Name: CAGNE

Date received: 18 June 2022

From:



[Harrold, George](#)

Subject:

Gatwick Airport expansion

Date:

18 June 2022 10:22:53

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<https://intranet.planninginspectorate.gov.uk/news/retiring-gsi-email-addresses/>

CAGNE Communities Against Gatwick Noise and Emissions

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

18th June 2022

Rt Hon Grant Shapps MP
Secretary of State for Transport
Department for Transport
Great Minster House
33 Horseferry Road
London SW1P 4DR

Dear Minister

CAGNE, the umbrella aviation community and environment group for Sussex, Surrey, and Kent, write to you concerning the two processes that Gatwick is currently undertaking –

1. **DCO – planning application to rebuild the emergency runway as a 2nd runway**

Currently Gatwick is operating forums concerning noise envelopes, due to the plans to expand Gatwick with a 2nd runway, using the existing flight paths so not requiring a CAP1616 process according to the CAA (CAP1908).

PINS has requested that Gatwick undertake further work on the noise envelopes, as offered in the poor public consultation of September-December 2021, which they say will be legally binding to the amount of noise residents will have to endure.

Currently we have seen poor documentation provided by Gatwick and rushed meetings with selected stakeholders to push ahead with this work. It would seem that the noise envelope material does not reflect what is deemed as a 'noise envelope' (CAP1129) but only as noise contours being viewed as envelopes to 45dB and 51dB.

2. **FASIS – modernisation of airspace**

Gatwick is currently at stage 2 of the CAP1616 process to modernise the airspace above residents' homes, with many new flight paths being implied via poor mapping that is difficult to read. This is being offered after Gatwick conducted a very narrow engagement with selected stakeholders.

What is clear from both of the above, is that Gatwick is basing these proposals on a 2-runway operation.

No noise envelopes are currently being offered as part of this FASIS process, and yet, Gatwick is operating both processes concurrently for a 2-runway operation.

As both are seeking expansion with a new runway, how can residents be convinced that the legally binding noise envelopes will not be changed to accommodate FASIS?

Should FASIS and the DCO be both legally binding to the noise envelopes set through the DCO process?

Could you please explain how these two processes are being allowed to run simultaneously, when the DCO legal agreement would be anything but legally binding (giving residents assurances of impact of 2 runways) when Gatwick seeks new flight paths over new areas that will significantly increase noise around Gatwick.

A review of noise envelopes (later, via the local planning authority) would mean that they can be changed by Gatwick with retrospective planning. It would be hard to stop a business from growing, as we saw recently with the planning application to change a taxiway, which increased landings by 11 a day. This would not give residents any assurances of noise levels through the DCO planning process, as FASIS is also being conducted at the same time, but ignored by Gatwick.

Thank you for your assistance and we would be happy to meet to discuss, as we understand that your department is meeting with other noise groups.

Yours sincerely

Sally Pavey
Chair of CAGNE

On behalf of the CAGNE Committee

Cc PINS
CEO of CAA

Est Feb 2014

www.cagne.org

cagnetatwick@gmail.com

#pledgetoflyless

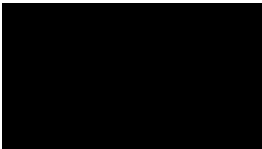
www.cagnepcforum.org.uk



Number: 8

Name: Stephen Heald

Date received: 30 July 2022



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[Twitter: @PlanningInsps](https://twitter.com/PlanningInsps)
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From: Stephen Hill
Sent: 30 July 2022 14:00
To: 'SI Enquiries' <SIEnquiries@planninginspectorate.gov.uk>
Subject: Gatwick North Runway

Dear Sir,

I have just discovered that the consultation is now closed.

No effort has been made by the Airport to contact me so that I could express my views. No communication was made about the consultation and no warning that it was to close.

Would you please register my view that the consultation was not properly conducted, and those who live nearby have not been consulted. Gatwick have constantly failed to take account of the views of local residents. I believe they should start their consultation again and make sure they properly contact all interested parties. It is not sufficient to expect people to find out what is going on through their website.

I look forward to your response.

Kind regards,

Stephen Hill



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DPC: 5636648472

[Environmental advice: always think about the environment before printing this email]

Number: 9

Name: GACC

Date received: 14 July 2023



Campaign Office: 2 Glovers Gate,
Glovers Road, Charlwood RH6 0EG
Tel 01293 862821
www.gacc.org.uk
info@gacc.org.uk

The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

14th July 2023

Dear Sirs

**GATWICK AIRPORT DEVELOPMENT CONSENT ORDER APPLICATION:
ADEQUACY OF CONSULTATION**

We are writing to set out our views on the adequacy of Gatwick Airport Limited's (GAL) consultation in relation to its application for a Development Consent Order to authorise alterations to its northern runway and associated works.

GACC is the principal environmental group seeking to protect and improve the environment in the areas affected by Gatwick Airport's operations. Founded in 1968, GACC has particular regard to noise, congestion, air quality and light pollution and seeks to diminish any wider environmental impact of the airport's operations, and the activities it facilitates, including climate change impacts.

Although we are not a statutory consultee for Adequacy of Consultation purposes, we note from the Planning Inspectorate's Advice Notes and Frequently Asked Question guidance that you can consider comments from third parties in addition to the statutorily required Acceptance tests when making a decision about whether or not to accept an application under section 55 of the Planning Act 2008. We request that you do so on this occasion given the serious reservations we have regarding GAL's consultation, as set out below.

For the avoidance of doubt we wish to put on record the fact that GACC has engaged extensively with the consultation process operated by GAL. We drew the airport's attention to the deficiencies in its consultation repeatedly during the consultation periods, both in our responses and in separate correspondence, but did not receive meaningful responses to many of the issues we raised. We have also, as advised by the Planning Inspectorate's Advice Notes informed all Host and Neighbouring Local Authorities of our concerns.

Our principal concerns regarding GAL's consultation are as follows:

The economic analysis in the consultation documents contained material errors and omissions. In particular the Autumn 2021 consultation used out of date values for the carbon emissions projected to be generated by the proposed development. Gatwick's consultation used old government carbon values of £69 per tonne of CO₂ equivalent in 2020 rising to £231 in 2050.

The government carbon values at the time Gatwick's consultation was published were £241 per tonne in 2020, rising to £378 in 2050. In addition Gatwick's Autumn 2021 consultation failed to quantify the non-CO₂ climate change effects of the air travel that the development would facilitate and the climate impacts of arriving flights. Government guidance requires all these costs to be monetized and taken into account in project appraisals.

As a result of these errors and omissions the climate costs set out in the Autumn 2021 consultation were understated by many billions of pounds. If government guidance had been followed accurately and correct carbon emission values had been used the overall net present cost of the climate impacts arising from Gatwick's proposed expansion would be at least £13bn, rising to £25bn with arriving flights fully accounted for whereas the figure disclosed in Gatwick's consultation was £2bn. This difference is highly material in the context of the overall economic benefits claimed for the proposed development. These errors were not corrected in the Summer 2022 consultation.

The effect of Gatwick's uncorrected economic analysis errors is that respondents to the consultations were misled about the costs of the proposed development and its overall economic benefits and were therefore unable to respond to the consultation in an informed manner.

The air traffic projections in the consultation documentations gave an erroneous and misleading impression of the need for the development and are not consistent with the Airports National Policy Statement (ANPS) because they assume there will be no development at Heathrow Airport. 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.

GAL's failure to provide an appropriate and policy compliant assessment of the need for the development taking account of the government's preferred Heathrow Northwest runway development means that respondents to the consultations have not been able to evaluate Gatwick's proposals in a policy-compliant market context. Responses to the consultation cannot therefore be relied on in this respect.

The consultation documents (and the additional noise envelope engagement carried out in 2022) mischaracterised the noise impacts of the proposed development, made unsupported assertions on noise matters and did not provide sufficient information to allow respondents to evaluate noise impacts in specific areas.

The additional noise envelope engagement process was itself defective in numerous material respects including the time allowed and Gatwick's refusal to provide additional information that was central to a proper understanding of the suitability of alternative noise envelope metrics. As a result this engagement did not in our view comply with the CAA's advice on noise envelope engagement or the Government's requirements as set out in the Airports National Policy Statement (ANPS). Nor did it comprise "*another appropriate method*" of engagement as advised by the Planning Inspectorate in cases where the CAA's guidance is not followed. The engagement GAL has carried out therefore does not, in our view, provide a sound basis for noise envelope proposals and GAL's proposals cannot be considered to have been "*defined in consultation with local communities*" as required by the ANPS.

The effect of these issues is that respondents to the consultation were misled and not able to understand the likely noise effects of the Proposed Development and were therefore unable to respond to them in an informed manner.

In each of these areas GAL's consultations were misleading because they were not "*based on accurate information that gives consultees a clear view of what is proposed ...*" as required by the Planning Act 2008 Guidance, did not provide sufficient information to allow informed responses and did not permit the "*intelligent consideration*" required by the Gunning Principles for consultations.

We emphasise that each of these concerns relates to the consultation process itself and not to the merits of the application.

We further note that Gatwick's Statement of Community Consultation (SOCC) committed the airport to "*ensuring the local community has the opportunity to understand ... our Northern Runway Project proposals*" and that its objectives included "*ensuring thorough, open, and transparent engagement and consultation on our proposals*", "*ensuring proposals are clearly presented, and issues easily understood*" and "*providing sufficient opportunities for interested parties to understand and influence our plans*".

We do not believe that those tests were met in relation to the issues raised above and therefore consider that the application should be rejected because the consultation did not conform with the airport's SOCC.

We request that you take these views into account when making a decision about whether or not to accept GAL's application and accordingly that you reject the application.

We are copying this letter to all Host and Neighbouring Authorities.

Yours sincerely,

Peter Barclay
Chair, Gatwick Area Conservation Campaign

Number: 10

Name: Gateley Hamer on behalf of Surrey County Council

Date received: 21 July 2023

George Harrold
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

Date 21st July 2012

Our ref: SCC/JD/IM
[REDACTED]

E-mail:

[REDACTED]@gateleyhamer.com

Dear Mr Harrold,

Application by Gatwick Airport Limited for an Order Granting Development Consent for the Gatwick Airport Northern Runway Project - Adequacy of consultation request - Your Ref: TR020005

We act for Surrey County Council in this matter and have been in discussions with the Acquiring Authorities land agents, Dalcour Maclaren regarding land issues.

I refer to your letter of 7th July advising of the submission of the Gatwick Northern Runway DCO application and requesting an adequacy of consultation response.

We can confirm that we, Gateley Hamer, have been in consultation with the Acquiring Authorities land agents regarding land issues and that the consultation is planned to continue.

Consultation has not been as frequent as would be expected, however, it is ongoing with a view to agreeing terms.

Yours sincerely

[REDACTED]

Ian Miles
Technical Director
for Gateley Hamer Limited

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