

Your ref: TR020005

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By Email to
gatwickairport@planninginspectorate.gov.uk

6 February 2024

Dear Mr Gleeson,

APPLICATION BY GATWICK AIRPORT LIMITED FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE GATWICK AIRPORT NORTHERN RUNWAY PROJECT

NATIONAL HIGHWAYS RESPONSE TO RULE 6 LETTER

This letter is National Highways' formal response to the Rule 6 letter in respect of the Development Consent Order (DCO) application by Gatwick Airport Limited (the Applicant) for consent to expand Gatwick Airport (the Airport). National Highways is the government owned company which operates, maintains and improves the Strategic Road Network (SRN) as the strategic highway company appointed under the provisions of the Infrastructure Act 2015 and in accordance with the Licence issued by the Secretary of State for Transport.

National Highways is a statutory consultee to the planning process. It has a specific obligation to deliver economic growth through the provision of a safe and reliable SRN, in line with the provisions set out in DfT circular 01/2022: the strategic road network and the delivery of sustainable development. The circular sets out how National Highways will work with developers to ensure that specific tests are met when promoting a scheme. This includes ensuring the transport impact is understood, any mitigation (or other infrastructure) is designed in accordance with the relevant standards and that environmental impacts are appraised and mitigated accordingly. The Applicant's proposals directly impact infrastructure for which National Highways is responsible.

Request to be heard orally at Preliminary Meeting

Following receipt of the Rule 6 letter dated 5 January 2024 (the Rule 6 letter), National Highways writes to request attendance at the Preliminary Meeting on Tuesday 27

February 2024. National Highways has made its submissions on the examination procedure, and the Initial Assessment of Principal Issues below.

It is noted that the Examining Authority has requested Interested Parties explain “why... points need to be made orally rather than in writing”. National Highways can confirm that it intends only to make oral submissions in response to any queries raised, or potential responses to the Applicant’s submissions in relation to National Highways’ submissions in this letter.

In accordance with the request in Annex B of the Rule 6 letter, National Highways has provided the required information below and can confirm that our representatives have completed the Event Participation Form.

Name and unique reference number	National Highways 20044834
Email address (if available) and contact telephone number.	Various (information provided directly on Event Participation Form)
Name and unique reference number of any person/ organisation that you are representing (if applicable).	Various (information provided directly on Event Participation Form)
Confirmation of whether you will participate virtually or in person.	In person
The agenda item on which you wish to speak and a list of the points you wish to make.	As noted, National Highways wish to attend in an observational capacity and will only make oral submissions in response to any queries raised, or potential responses to the Applicant’s submissions in relation to National Highways’ submissions in this letter.
Any special requirements you may have (e.g. disabled access or hearing loop).	N/A

We wish to make the following additional comments on the content of the Rule 6 letter.

Initial Assessment of Principal Issues

As set out in detail in National Highways' Relevant Representation [RR-3222], National Highways has concerns relating to the impacts on the SRN from the proposed Gatwick DCO.

National Highways notes that the principal issues identified by the Examining Authority at Annex C to the Rule 6 letter contain a number of broad topic areas. Whilst our concerns set out in the Principal Areas of Disagreement Summary Statement (Annex A of National Highways' Relevant Representation) could fall within the categories identified by the Examining Authority, National Highways request clarity on where these matters sit. National Highways wishes to highlight the following matters in particular for specific consideration by the Examining Authority:

- Fundamental concerns relating to the traffic modelling presented by the Applicant.
- Issues relating to highways design.
- Construction and operational impacts on the Strategic Road Network.
- Security of mitigation, including in relation to a number of interventions which are assumed in the traffic model but not secured under the terms of the dDCO.
- Loss of biodiversity on the Strategic Road Network.

Requests to be heard orally at ISH2 and ISH4

National Highways also confirms that it proposes to attend Issue Specific Hearing 2 (ISH2) on Control Documents/ the Development Consent Order, and Issue Specific Hearing 4 (ISH4) on Surface Transport.

National Highways welcomes the advanced publication of hearing agendas and requests that hearing agendas for future hearings are also shared at least ten (10) working days prior to hearings. National Highways considers this a reasonable amount of notice to allow it to prepare for hearings and allocate personnel for attendance at hearings.

Request for an Additional Issue Specific Hearing(s)

In addition to the clarity sought by National Highways on how its key issues will be examined, to ensure that progress is being made by the Applicant in resolving National Highways' concerns, National Highways requests that the Examining Authority hold a, or series of Issue Specific Hearing(s) in June 2024 to check progress on, and resolve outstanding concerns relating to the impacts on the SRN, including matters related to highway design, traffic modelling issues, security for any mitigation, and construction and operational impacts on the road network.


Examination timetable

National Highways notes that a number of Deadlines involve the submission of Statements of Common Ground, or other submissions which require engagement between the Applicant and National Highways. National Highways therefore politely requests that the Applicant is clear about the timescales and programmes associated with such submissions to allow the Examining Authority to have the information it has requested.

National Highways has no further comments on the Rule 6 letter, and confirms that it will use reasonable endeavours to meet the Deadlines set out therein.

Yours sincerely



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