

Application by Gatwick Airport Limited for an Order Granting Development Consent for the Gatwick Airport Northern Runway Project (Project Reference: TR020005)



Written Representation

West Sussex County Council (IP 20044715)

March 2024

1. Introduction

- 1.1 This is the Written Representation (WR) from West Sussex County Council (WSCC) on the application by Gatwick Airport Limited (hereafter the 'Applicant') for a Development Consent Order (DCO) for the Gatwick Northern Runway Project (the 'Project').
- 1.2 [PINS Advice Note 2](#): 'The Role of Local Authorities in the Development Consent Process' (February 2015) states that a WR is the most appropriate document for a local authority to set out its view, that is, whether or not it supports an application and its reasons.
- 1.3 The WR sets out a short summary of WSCC's principal issues of concern and should be read alongside the submitted Relevant Representation (RR) (RR-4773) and Principal Areas of Disagreement Summary Statement (PADSS) (AS-072), and the recently-submitted joint West Sussex Local Impact Report (LIR) and first iteration of the WSCC Statement of Common Ground (SoCG) with the Applicant.

2 Scope and Purpose of the LIR

- 2.1 WSCC is a co-author, with Crawley Borough Council (CBC), Horsham District Council (HDC), and Mid Sussex District Council (MSDC), of the joint West Sussex LIR submitted at Deadline 1. The LIR is a detailed technical report focussing on environmental, social, and economic matters and the Project's positive, neutral, and negative impacts. It also sets out the additional mitigation measures considered necessary to mitigate the negative impacts and to secure positive benefits for the County.

3 WSCC Position

- 3.1 WSCC acknowledges the importance of Gatwick Airport as a significant asset that contributes to the County's economy. Any proposals for growth need to be achieved responsibly, sustainably, and with a focus on the well-being of communities within West Sussex and beyond. It is recognised that national aviation policy gives 'in principle' support for proposals to increase passenger numbers and air traffic movements by making best use of the existing runways at Gatwick. However, careful account must be taken of all relevant considerations, particularly economic and environmental impacts and proposed mitigation.

- 3.2 WSCC, together with the other Gatwick authorities, has provided detailed technical responses to the consultation undertaken by Applicant. However, as outlined in WSCC's Adequacy of Consultation (AoC) Representation and the Joint Local Authority AoC Representation submitted in July 2023 (AoC-020 and AoC-023), it is disappointing that there has been so little positive engagement by the Applicant in the pre-application phases. This has resulted in WSCC having substantive outstanding issues with the submission documents. This situation has continued with the recent consultation on the proposed changes, as reflected in WSCC's response to the Applicant in January 2024.
- 3.3 The intensification of development at Gatwick Airport will lead to construction and operational effects, which will have adverse impacts on the environment and local communities of West Sussex and beyond.
- 3.4 WSCC maintains that further evidence, environmental assessment, and justification of key assumptions is required across a number of technical elements. This is to allow these relevant considerations to be assessed and for WSCC to be satisfied that Gatwick Airport can grow and be operated in a sustainable and responsible manner, and that effective mechanisms are in place to ensure that benefits will be maximised and secured.
- 3.5 Therefore, WSCC cannot support the NRP DCO application in its current form, because there are a number of matters of significant concern that have not been satisfactorily addressed to date by the Applicant. These are:
- i. Understanding the basis for passenger forecasts and the assumptions that underpin them.
 - ii. Justification for supporting infrastructure and its necessity to facilitate the required passenger throughput.
 - iii. Lack of evidence regarding the assessment of alternatives for Project infrastructure and how the set of design principles will ensure a secured approach to good design, particularly for the Central Area Recycling Enclosure (CARE facility) and highways works.
 - iv. Lack of clarity about the construction phase and potential impacts and mitigation - concern about lack of phasing information to enable local communities and WSCC to understand if the impacts have been appropriately addressed and mitigated, given that the duration of the construction programme (up to 14 years).
 - v. Clarity on the socioeconomic benefits, including the number, type, quality, and location of jobs created, the link between current labour supply and jobs created, and local economic benefits.
 - vi. Concerns related to traffic and transport, including the impact of other strategic development, and forecasting assumptions about mode share for both passengers and staff. There is insufficient evidence and mitigation to demonstrate if target mode share percentages for staff and passengers can be met and that suitable controls are in place should the modal split targets not be met.
 - vii. Concerns about the highway mitigation proposals:
 - a. The proposals would increase some journey times (including potentially for emergency response vehicles) and result in a

- redistribution of traffic, including from the strategic to the local highway network;
- b. Insufficient justification has been provided for proposed speed limits on the local road network and, in lieu of the submission of a Stage 1 Road Safety Audit, it has not been demonstrated that the road safety implications have been fully considered. It is also not apparent what design standards have been applied to highway works or whether they accord with the relevant standards (as no design review has been submitted); and
 - c. Further modelling information is required to fully assess the transport implications, from a capacity perspective, on the local road network and specifically relating to the North Terminal signalised junction.
- ix. Further presentation of the required evidence base and justification of the noise and air quality effects (and proposed mitigation) from both construction of the additional infrastructure and the operational phase (including the increase in overflights).
 - x. Concerns about the significant increase in greenhouse gas emissions and impacts on climate change, and understanding how airport expansion can be justified in the light of national and international carbon reduction targets (along with concerns over fundamental flaws in the assessment undertaken).
 - xi. Potential impacts to sensitive species and habitats:
 - a. Concern is raised about the extent of vegetation that would be lost (primarily along the road corridor), which is significant and its effects on ecosystem service benefits and the loss of connectivity at a landscape scale;
 - b. A 14-year construction programme will prolong the impacts of habitat loss and, in some locations, mitigation will not be in place until the end of the construction period. It is not clear if the limited areas identified for environmental mitigation and enhancement will adequately compensate for the significant loss of habitat; and
 - c. The River Mole crossings, road widening, new pedestrian and cycle links, temporary works compounds, temporary access and other works could all impact on ecology.
 - xii. Of particular concern, is the lack of sanction should the continued development growth of the airport, which is envisaged, give rise to consequences that exceed expected environmental parameters without any clear accountability to the Local Authorities or the local community. The proposals to mitigate impacts of airport growth should be delivered following the environmentally-focused principles of 'Green Controlled Growth', as proposed in the recent Luton Airport DCO.
 - xiii. The West Sussex LIR identifies wide-ranging adverse impacts across all topic areas. There are concerns about the limited scope and scale of environmental mitigations (and the control mechanisms set out in the draft DCO (dDCO) to secure these) and community compensation in light

of the likely adverse effects arising from the Project. These concerns are reflected in the significant gap in expectations that currently exist between the Applicant and WSCC.

- xiv. The need for enhancement measures (including to Public Rights of Way, recreational facilities, and ecological habitats).

3.6 As part of the examination process, WSCC wishes to engage proactively with the Applicant to reduce the areas of concern. This work will also contribute to further refinement of the PADSS, as well as informing the development of the WSCC SoCG, further written evidence, and any response to the Examining Authority's questions. WSCC also recognises the importance of liaising meaningfully on the detail of the Section 106 Agreement, which is currently being negotiated with WSCC and the Applicant's legal representatives.

3.7 WSCC is also concerned that there would be a significant future resource implication for the discharge of the relevant DCO Requirements (given WSCC's statutory functions as Waste Planning Authority, Local Highway Authority, and Lead Local Flood Authority), within the expected deadlines and the associated monitoring responsibilities associated with the DCO. WSCC would expect full cost recovery to resource these additional demands, as well as associated agreements to ensure that appropriate and funded pre-requirement discharge discussions take place.

3.8 As an Affected Party, WSCC, as landowner, is likely to attend the Compulsory Acquisition Hearing (CAH) on 2 May 2024 to address the Applicant's proposed permanent acquisition of highway plots.

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