



# Gatwick Airport Northern Runway Project

The Applicant's Response to the Examining Authority's  
Written Questions – Land Use and Recreation

**Book 10**

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## 1 Response to the Examining Authority’s Written Questions – Land Use and Recreation

The below table sets out the Applicant’s response to the Examining Authority’s Written Questions relating to land use and recreation.

ExQ1	Question to:	Question:
<b>LAND USE AND RECREATION</b>		
LU.1.1	The Applicant	<p>Can the Applicant confirm whether potential soil and groundwater contamination from per- and polyfluoroalkyl substances (PFAS) associated with the fire training ground have been considered in the ES, given that firefighting foam is a known source of this contaminant?</p> <p>This has been considered as part of the assessment in <b>ES Chapter 10 Geology and Ground Conditions</b> <a href="#">[APP-035]</a>. The fire training ground has been considered as a potential area of concern (PAOC 15) under <b>ES Appendix 10.9.1: Preliminary Risk Assessment</b> <a href="#">[APP-138]</a>) with PFAS identified as a potential contaminant of concern associated with this use in Table 4.1.1: Outline Conceptual Site Model.</p>
LU.1.2	The Applicant	<p><b>Loss of Agricultural Land</b></p> <p>NNNPS (paragraph 5.189) states “<i>Applicants should take into account the economic and other benefits of the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification). Where significant development of agricultural land is demonstrated to be necessary, applicants should seek to use areas of poorer quality land in preference to that of a higher quality</i>”.</p>

		<p>Please explain how the test in paragraph 5.189 of NNNPS is satisfied in respect of the Proposed Development?</p> <p>The quality of the agricultural land affected by the Proposed Development is assessed in <b>ES Chapter 19: Agricultural Land Use and Recreation</b> [<a href="#">APP-044</a>]. The land comprises entirely lower quality Subgrade 3b land according to the MAFF Agricultural Land Classification Guidelines 1988 and therefore satisfies the test in the NNNPS, as no best and most versatile land in grades 1, 2 or 3a is affected by the Project.</p>
LU.1.3	The Applicant	<p><b>Animal Wellbeing</b></p> <p>What consideration has been given to the effect on the health and wellbeing of animals housed or grazing close to the Proposed Development ie effects due to noise and dust? What, if any, measures are necessary to mitigate effects and how will these be secured?</p> <p><b>ES Appendix 5.3.2: Code of Construction Practice</b> [<a href="#">REP1-021</a>] (Section 5.12) identifies the measures that would be implemented to control the potential effects of construction on farming operations.</p> <p>Construction dust would be managed through the implementation of Construction Dust Management Plans (see paragraph 5.8.2 of the CoCP), whilst the primary consideration was to protect human health the measures to prevent dust would be suitable for minimising dust deposition on grazing land where required. Noise generating construction activities would be undertaken in accordance with best practicable means (BPM), as defined by the Control of Pollution Act 1974 (see paragraph 5.93).</p> <p>Additional measures to mitigate effects on the management of livestock identified in Section 5.12.5 of the CoCP would also include the implementation of appropriate fencing, along with the maintenance of</p>

		<p>accesses, together with the maintenance of water supplies and the implementation of biosecurity measures in accordance with the <b>Outline Landscape and Ecological Management Plan</b> [<a href="#">REP2-021</a>].</p> <p>The commitments in respect of the CoCP and the oLEMP are respectively secured through Requirements 7 and 8 of the draft DCO (Doc Ref 2.1 v6).</p>
LU.1.4	The Applicant	<p><b>Soil Management Strategy – Landowner Contact</b></p> <p>Paragraph 2.1.2 of the Soil Management Strategy (SMS) [<a href="#">APP-086</a>] states that there will be a clear point of contact for each landowner/ occupier.</p> <p>Has the Applicant appointed an Agricultural Liaison Officer or equivalent? If not, please explain how this role will be managed?</p> <p>Dalcour Maclaren are currently appointed as agents by the Applicant to liaise with individual landowners in relation to the proposed development. An Agricultural Liaison Officer (or named contact for landowners) for the construction phase of the proposed development has not yet been appointed, but the appropriate contact would be established during the procurement of the construction contractor/s as secured at Section 6.1.4 of the <b>Code of Construction Practice</b> [<a href="#">REP1-021</a>].</p>
LU.1.5	RPA's	<p><b>Soil Management Approach</b></p> <p>RPA's are asked whether the approach and content of the CoCP [<a href="#">REP1-021</a>] and associated appendices (eg the SMS [<a href="#">APP-086</a>]) in respect of the management of potential effects on soil resources is appropriate? If not, please detail additional methods and/ or mitigation measures considered necessary.</p>

		<p>In addition, please confirm whether you are satisfied that soils would be suitable for the required end use and the appropriateness of the proposed soil restoration methods.</p>
		<p>N/A – this question is not directed to the Applicant.</p>
LU.1.6	The Applicant	<p><b>Soil Management Strategy – Audits</b></p> <p>Please confirm whether the final SMS would be subject to any internal compliance audits? If so, would the SMS be reviewed and updated as necessary? Please provide detail in respect of this process.</p>
		<p>The Soil Management Strategy (SMS) would remain as drafted in <b>ES Appendix 5.3.2 Annex 4 [APP-086]</b>. This provides the method and control measures to be adopted during the construction period in accordance with recognised best practice. Individual soil management plans would be developed for each of the areas within the proposed development in accordance with the SMS, where soil materials (topsoils/subsoils) are to be stripped, stored and restored, together with proposals for the implementation of appropriate aftercare management measures. These individual plans would be subject to approval by the relevant LPAs as described in the CoCP which is secured by DCO Requirement 7.</p>
LU.1.7	The Applicant	<p><b>Soil Management Strategy - Bunds</b></p> <p>Where soil is to be stored in bunds for over 3 months, will these be covered to minimise erosion? If not, please explain why this is not considered necessary.</p>
		<p>In accordance with Section 6.1 of the <b>Soil Management Strategy</b> (Annex 4 to the Code of Construction Practice) [APP-086], the storage mounds would be shaped by the excavator or dozer to consolidate the</p>

		<p>surface (without compaction). Where the soil bunds would be in place for more than three months these would be proposed to be seeded to provide a vegetative cover.</p>
<p>LU.1.8</p>	<p>The Applicant</p>	<p><b>Soil Management Strategy – Mixing of Soils</b></p> <p>What documentation and physical control measures would be put in place to prevent accidental mixing of soils? How would these measures be secured through the dDCO?</p> <p>The separate stripping, storage and restoration of individual topsoil and subsoil units is secured through the SMS and the individual soil management plans to be produced. The key to ensuring that soil materials do not become mixed is to clearly identify the materials and thicknesses to be stripped and to ensure that the location of the storage areas are clearly marked and do not lie in areas where they will not be subject to any contamination with adjacent stored construction materials or in areas where they are liable to trafficking.</p> <p>Measures to ensure that soils are appropriately stripped and stored are captured in Section 5.1.2 of the SMS which states that for each of the identified works areas where soils are to be stripped, stored and restored, a soil management plan would be produced and approved by the relevant Local Planning Authority (LPA) as described in the CoCP secured by DCO Requirement 7. This would include the following information:</p> <ul style="list-style-type: none"> <li>• the proposed thickness of soil strip within the individual soil units that exist in the area;</li> <li>• the location of the soil storage areas; and</li> </ul>

		<ul style="list-style-type: none"> <li>haul route locations.</li> </ul>
LU.1.9	The Applicant	<p><b>Soil Management Strategy – Information Dissemination</b></p> <p>How would the transmission of information contained within the final Soil Management Plan (SMP) be disseminated on site?</p> <p>Section 2 of the <b>Soil Management Strategy</b> <a href="#">[APP-086]</a> identifies that there would be a designated person appointed to be responsible for supervising and monitoring the implementation of the procedures within the SMS. This would include the implementation of the individual Soil Management Plans, including the use of appropriate Toolbox Talks as referenced in the Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (2009). This is secured through DCO Requirement 7.</p>
LU.1.10	The Applicant	<p><b>Soil Management Strategy – Stockpiles</b></p> <p>How would the suitability of soil stockpiles for restoration be assessed? Please confirm whether the final SMP would include a restoration methodology</p> <p>In preparation for the aftercare period, Section 10 of the <b>Soil Management Strategy</b> <a href="#">[APP-086]</a> confirms that initial works would include:</p> <p><i>“Soil samples would be taken from the bunds to be used in the restoration of the area to determine nutrient levels and inform proposals for lime and fertiliser applications.”</i></p> <p>These soil analyses would also inform the seed mixture that would be used in the first year of aftercare</p>



		and any initial cultivations that may be required as secured through DCO Requirement 7.
LU.1.11	The Applicant	<p><b>Agricultural Land</b></p> <p>Paragraph 19.6.13 of ES Chapter 19: Agricultural Land Use and Recreation [<a href="#">APP-044</a>] states that there are additional land parcels identified as potential areas for environmental mitigation that also comprise agricultural land.</p> <p>The Applicant is asked to list these areas and confirm whether they comprise of best and most versatile (BMV) agricultural land. If so, please detail the grading.</p>
		<p>The agricultural land included in this category is land where no earthworks or disturbance to in situ soils and hence their quality is proposed as part of the proposed development and therefore not assessed in relation to the loss of agricultural land quality during construction or operation. This area would comprise the approximate area of 10.2 ha of land to west of the River Mole excluding Museum Field which is excavated to provide the flood compensation area.</p> <p>Whilst the loss of agricultural land quality is not assessed the change in land use and loss of agricultural productivity from the farm holding at Brook Farm has been assessed as part of <b>ES Chapter 19: Agricultural Land Use and Recreation</b> [<a href="#">APP-044</a>].</p> <p>In terms of the soil type and agricultural land quality of this area of land where soils are not disturbed by the proposed development, it comprises heavy textured and poorly drained clayey soils of the Denchworth soil series.</p>

		<p>Two separate visits to the area of land were made during period of the trial trenching operation that took place in September 2021 to observe the soil characteristics within the exposed soil profiles. These observations confirmed the results of the early ALC survey work undertaken in the proposed Museum Field flood compensation area. It also showed the soils in the remaining area west of the River Mole to comprise heavy textured, poorly drained clayey soils typical of the Denchworth soil series, which would be graded no higher than Subgrade 3b according to the ALC system.</p>
<p>LU.1.12</p>	<p>The Applicant</p>	<p><b>Farm Holding Information</b></p> <p>The farm holding information detailed at paragraphs 19.6.20 to 19.6.27 of the ES [<a href="#">APP-044</a>] and the content of Table 19.7.1 is noted. The Applicant is however asked to produce a table detailing the following information:</p> <ul style="list-style-type: none"> <li>a) Name and address of holding;</li> <li>b) Relevant plot number;</li> <li>c) Total size of holding;</li> <li>d) Holding use;</li> <li>e) Breakdown of land classification – by hectare and percentage of holding;</li> <li>f) Summary of proposed project activity on holding; and</li> <li>g) Loss of land – defined by temporary and/ or permanent by both hectare and percentage of holding.</li> </ul> <p>The table of information requested is produced below at <b>Appendix A</b> to this document.</p>

LU.1.13	The Applicant	<p><b>Museum Field – Informal Recreational Space</b></p> <p>Concern has been raised in Table 11.1 of the Joint West Sussex LIR that the new route would be relatively inaccessible as access would be via an indirect permissive route and the remote location of the space would have poor links to existing Public Rights of Way (PRoW). This would therefore result in a barrier to effective use by the nearby community [REP1-068]. Please provide comment in respect of this concern and confirm whether improved connectivity could be achieved?</p> <p>The land to the west of the River Mole including Museum Field is proposed as an area of ecological and landscape mitigation. The outline designs for the area include informal public access to this area through a new link from the existing permissive footpath route along the River Mole. The commitment to the provision of this footpath route is included at paragraph 4.4.2 of the <b>oLEMP</b> [REP2-021]. This ecological and landscape mitigation area is not being proposed to be provided as a designated area of open space. Designated areas of open space are proposed in areas adjacent to the Church Meadows and within Car Park B, north and south.</p> <p>The current permissive route located on the western bank of the River Mole acts as a rural footpath to walk south along the river and is used regularly by walkers and dog walkers who enjoy views across the River Mole and the wider Gatwick airfield. Access to this route can be gained from the Sussex Border Path which also runs along the western bank of the River Mole.</p> <p>The Applicant did review the possibility of providing a pedestrian access to the north western part of the ecological area which borders the Horley Road from the pavement footpath which connects to Charlwood Village. However, the winding nature of the road compromises sight lines in this location and, together with the proximity to the change in speed limit, does not make for a safe pedestrian crossing either where</p>
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		<p>the paved path currently terminates or indeed to either side of this location. In order to create a safe and compliant crossing with good sight lines, it is likely that removal and re-alignment to portions of existing hedgerows and movement of utility poles would be required. A bridge would also be required across the highways ditch on the south side of the road. The location of the 30mph speed limits might also have to be moved further east towards Brook Farm. The Applicant also considered that an unintended consequence of providing the connection could be that people wanting to access the area would park their cars on the pavement or soft verge, which would again be undesirable, reduce amenity to existing residents, affect access to their driveways, and overall be unsafe.</p>
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## Appendix A Response to LU.1.12

Holding Number in ES Chapter 19	Name and Address of Holding	Relevant Plot Numbers	Area subject to permanent acquisition powers	Area subject to powers of temporary possession and Permanent Rights acquisition	Total Size of Holding	Holding Use	Land Classification within Plots affected	Proposed Project Activity on the holding
1	Gatwick Green 1 Ltd,  Fetcham Park Lower Road, Fetcham Leatherhead,  KT22 9HD	4/476  4/483  4/487	0.54 ha  (3% of commercial holding)  1.33acres	0.2 ha  0.72 acres	Approximately 28ha (70) acres in this land holding.	Grassland areas let out on short term agreements for grazing and hay making.  Cattle yard to north of M23 spur	Subgrade 3b in agricultural land to the south of M23 spur.	Highway improvements to the south side of M23.  Temporary land take (with permanent rights for provision of access route during construction to north of M23.
2	A and B Patrick 24 Higher Drive, Banstead SM7 1PF  D and D Elcock,	4/465	0.03 ha  0.07 acres		Ancillary plot to use of commercial holding	Non – agricultural margin	Non-Agricultural margin to field.	Highway works to north side of M23.

	4 Deerhurst Park, Forest Row  RH18 5GD							
3	Bayhorne Farm, 4/468  Bayhorne Lane, 4/470 Horley RH6 9ES	2 ha (8% of known holding)  4.92 acres	2.35 ha  5.79 acres		Approximately 25 ha (62 acres)	Horse grazing and livery yard at farm	Subgrade 3b land	Permanent acquisition for highways improvements at South Terminal Roundabout and provision of attenuation pond.  Temporary acquisition (with permanent rights) for construction area, to be restored to agricultural land.
5	Gatwick Dairy Farm, Reigate Road, Hookwood, RH6 0AA	1/013 1/013A, 1/032	0.9 ha (2% of known holding)  2.25 acres		Approximately 40 ha (100 acres) in two separate blocks of tenanted land.	Hay cropping.	Subgrade 3b land	Provision of an attenuation pond and pavement works as part of highway improvements.  Provision of replacement open space.
6	Brook Farm, Horley Road, Charlwood, Horley RH6 0BJ	2/349 2/358	10.2 ha (50% of holding)		Approximately 20ha (50acres) including land to the north and south of	Hay cropping/clay pigeon shooting enterprise.	Subgrade 3b land (not physically affected by the Project)	Provision of ecological and landscape mitigation. (Option agreement in place with owner)

			25.2 acres		Charlwood Road.			
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