



Horsham
District
Council



west
sussex
county
council

Gatwick Airport Northern Runway Project Development Consent Order

Planning Inspectorate's Reference: TR020005

Joint West Sussex Project Changes Summary

Deadline 3: 19 April 2024

Crawley Borough Council (IP Ref: GATW-AFP107)

West Sussex County Council (IP Ref: 20044715)

Horsham District Council (IP Ref: 20044739)

Mid Sussex District Council (IP Ref: 20044737)

1. Introduction

- 1.1 This document is a summary of the Joint Written Representation ("WR") submitted by the West Sussex Local Authorities comprising Crawley Borough Council ("CBC"), West Sussex County Council ("WSCC"), Horsham District Council ("HDC") and Mid Sussex District Council ("MSDC"), hereafter referred to as "the Authorities" as requested by the Examining Authority ("ExA").

2. Adequacy of Consultation

- 2.1 The Applicant has been made aware of the Authorities' concerns regarding the non-statutory consultation which took place in December 2023, and the Authorities believe the project change submission has not adequately addressed these comments.

3. Project Change 1

- 3.1 The Authorities consider more information is required on the layout and visual appearance of the proposed works and fully support the request made by the ExA ExQ1 GEN 1.19 for further design information.
- 3.2 Given the increase in footprint of the works, the Applicant should ensure there are no implications for calculations and assumptions made within the drainage strategy.

4. Project Change 2

- 4.1 The Authorities consider this a significant change to the Project, effectively removing a means of generating decentralised energy on site. The Applicant has not demonstrated compliance with local planning policy as a result. There is a lack of detail relating to the proposed building, including waste management and sustainability of the facility
- 4.2 The change raises questions about the implication moving waste off-site on traffic movements on local roads and on the strategic road network. It is unclear whether the proposal would be consistent with the waste hierarchy and what sorting technologies are proposed.
- 4.3 There is insufficient evidence to support the vehicle movement calculations and further information is required to understand how the proposed facility would operate in practice.

5. Project Change 3

- 5.1 There is a lack of detail around the construction of the reedbeds including the removal of soil, drainage arrangements, engineering details, means

of access to the construction compound and vehicle movements. It is also unclear how the Applicant proposes to protect nearby residents from odour, noise and dust during construction.

- 5.2 Further clarity is required on how the reedbeds would be managed once operational, both in respect of drainage and water quality, but also odour and noise impacts. The Applicant has not provided sufficient information about how safe environmental standards would be maintained.
- 5.3 There is insufficient detail in the information provided to allow the Authorities to assess likely visual impacts. Details of the method of construction and site levels are unclear, as are elements of the design of the area.
- 5.4 The Applicant has not adequately demonstrated that there will be no increase in flood risk. Further detail on water quality protection measures are also sought.
- 5.5 While, in principle, a reedbed could deliver ecological benefits further information is required to establish the scale and nature of the benefits. The potential for impact on the Land East of the Railway Line biodiversity area has not been addressed.
- 5.6 Limited information has been provided for the noise impacts, which makes the assumptions made by the Applicant difficult to verify. Further information is requested for the construction period, and detail of the maintenance of the blowers to ensure these mitigate odour while operating within the specified acoustic levels.

6. Cumulative Effects

- 6.1 The works proposed could reduce the ability of Crawley Sewerage Treatment works to expand and meet additional future demand likely to result from growth at the airport, and proposed development at Gatwick Green and Land West of Ifield.

7. Conclusion

- 7.1 The Authorities consider that further evidence should be sought from the Applicant to address the concerns raised and to allow the full impacts of the proposed changes and the proposed mitigation and associated controls to be assessed fully.