



**Horsham
District
Council**



GATWICK AIRPORT NORTHERN RUNWAY PROJECT

Planning Inspectorate's Reference: TR020005

LEGAL PARTNERSHIP AUTHORITIES

ISSUE SPECIFIC HEARING 8

**Legal Partnership Authorities Response to Actions Arising
at ISH8 [\[EV17-018\]](#)**

DEADLINE 6: WEDNESDAY 26 JUNE 2024

Crawley Borough Council (GATW-AFP107)

Horsham District Council (20044739)

Mid Sussex District Council (20044737)

West Sussex County Council (20044715)

Reigate and Banstead Borough Council (20044474)

Surrey County Council (20044665)

East Sussex County Council (20044514)

Tandridge District Council (GATW-S57419)

Issue Specific Hearing 8

Legal Partnership Authorities Response to Actions Arising at ISH8 [[EV17-018](#)]

Note: The Legal Partnership Authorities are comprised of the following host and neighbouring Authorities who are jointly represented by Michael Bedford KC and Sharpe Pritchard LLP for the purposes of the Examination:

- Crawley Borough Council
- Horsham District Council
- Mid Sussex District Council
- West Sussex County Council
- Reigate and Banstead Borough Council
- Surrey County Council
- East Sussex County Council; and
- Tandridge District Council.

In these submissions, the Legal Partnership Authorities may be referred to as the “*Legal Partnership Authorities*”, the “*Authorities*”, the “*Joint Local Authorities*” (“*JLAs*”) or the “*Councils*”. Please note that Mole Valley District Council are also part of the Legal Partnership Authorities for some parts of the Examination (namely, those aspects relating to legal agreements entered into between the Applicant and any of the Legal Partnership Authorities).

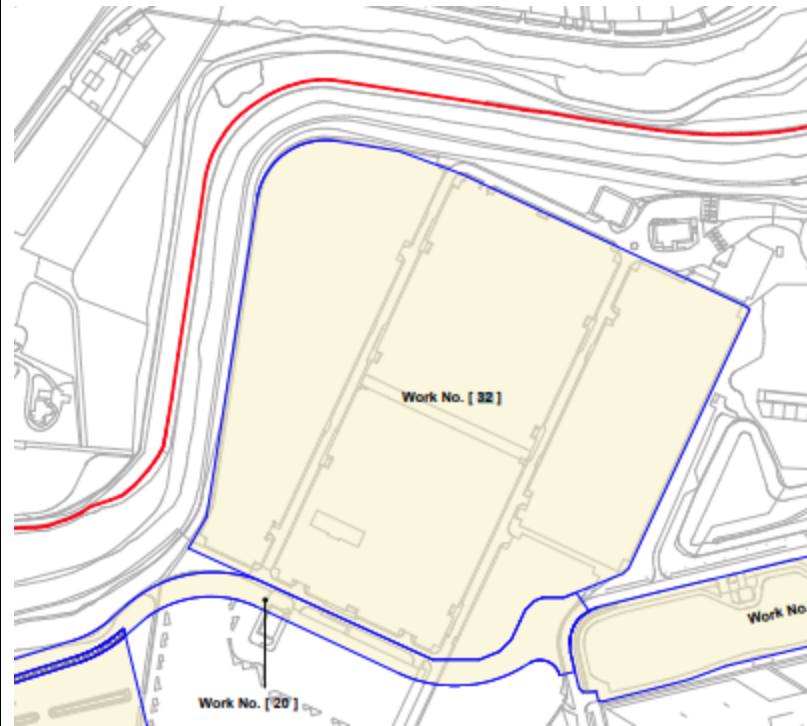
Purpose of this Submission

The purpose of this submission is to respond to the actions raised by the Examining Authority (“**ExA**”) at Issue Specific Hearing 8 to be answered by the Authorities at Deadline 6. The Legal Partnership Authorities response to action 23 (Discussion about outstanding issues relating to descriptions of work numbers) will follow at deadline 7 as requested by the ExA.

This submission includes, at Appendix A, a document titled “Design Note - Comments on Design and Access Statement - Appendix 1 -Design Principles (DP) Version 4 [[REP5-031](#)]” which responds to actions 6 and 7.

Action No.	Action	Legal Partnership Authorities Response
Item 5 – Good Design		
6	Comment on which other works they would like to see in Schedule 11 of the dDCO	<p>Please see the commentary provided in Appendix A to this document (Design Note - Comments on Design and Access Statement - Appendix 1 -Design Principles (DP) Version 4 [REP5-031]).</p> <p>Table 1 within Appendix A sets out the Works that the Authorities would wish to see included within Schedule 12 and the reason for inclusion.</p> <p>The list could be shortened if the relevant control documents (for example the Design Principles and the Design and Access Statements) and the works limits shown on the Works Plans and the parameter plans were amended to provide more detail. The Authorities are willing to discuss this further with the Applicant.</p>
7	Provide further information regarding specific changes to the DAS Appendix 1 which they would like to see.	<p>Please see the commentary provided in Appendix A to this document (Design Note - Comments on Design and Access Statement - Appendix 1 -Design Principles (DP) Version 4 [REP5-031]).</p>
Item 8 - dDCO		
24	Provide general view of whether the dDCO would benefit from the level of detail in the latest available dDCO available for the Luton NSIP	<p>The Authorities have already commented in response to ExQ1 DCO1.39 [REP3-135] on a suggested level of detail and remain of the view that more precise detail for some of the works within Schedule 1 would be appropriate. The main concern is that that for some works the works plans and parameter plans are drawn so generously a much larger building could be erected than is shown in the DAS. For example, Work 28 (for new hotel, car park and multi-storey car park), the indicative hotel footprint in the DAS [REP2-035] page 33 shows a 'C' shaped hotel footprint 7 storeys high next to a taller multi storey car park. There is nothing currently to stop this hotel building increasing in height or footprint or limiting any reconfiguration in terms of scale and design for the whole of the car park H site (office, hotel and car park), filling much more of the plot with more floorspace and increasing all buildings to the maximum parameter height. This level of flexibility is well beyond what is described in Chapter 5 of the ES 'Project Description'[REP1-017] which suggests an up to 400 bedroom hotel, 3,700 parking spaces and 5,000 sq m office.</p> <p>The Authorities consider it is reasonable to control the works to what has been described by the Applicant in the ES and has been considered by all parties during the Examination. It is assumed these approximate building sizes have been used to calculate employment and parking calculations which inform other chapters within the ES and the respective impacts, allowing such flexibility could undermine the validity of the supporting evidence.</p>

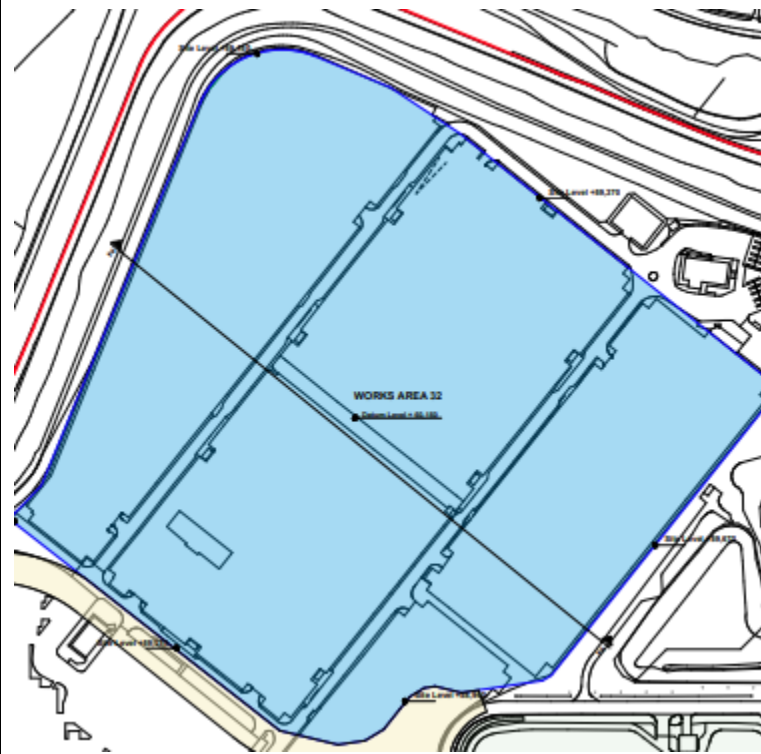
		<p>The Luton dDCO does contain a greater level of detail including parking numbers for the car parks. Some details listed in that dDCO such as Work No. 4h include security systems and wayfinding signage may seem over prescriptive but the Authorities would like to see further certainty over the quantum of development and various development elements within the descriptions in the Gatwick DCO. For example, it is suggested that Work No 29 in the Gatwick DCO could be expanded to read “Works to convert up to [add amount] sq m of floorspace to hotel containing up to 250 bedrooms and refurbishment of the building exterior”. Similarly, works comprising car parks could include maximum limits on the number of spaces that may be provided.</p>
<p>25</p>	<p>Comment on whether a schedule of parameters should be provided and what detail should it have.</p>	<p>A schedule of parameters was added (as Schedule 13) to the draft DCO submitted at deadline 5 [REP 5-006].</p> <p>The Schedule does no more than set out what the maximum building height is for each of the works listed in it. This is helpful to anyone who wishes only to know that information, but as the heading of the Schedule suggests, it only indicates what the parameter plans (the relevant control document) say.</p> <p>The issue that the Authorities have is about the wide scope which is given to the Applicant by the combination of the limits of the works shown on the works plans and the parameter plans.</p> <p>This can be illustrated by taking one of the works listed in Schedule 13 as an example: Work No. 32.</p> <p>Work No. 32 is described in Schedule 1 to the DCO as “Works to remove existing car parking at North Terminal Long Stay car park and construct a decked car parking structure”.</p> <p>The work is shown on sheet 1 of 7 of the Works Plans [REP5-016] as follows:</p>



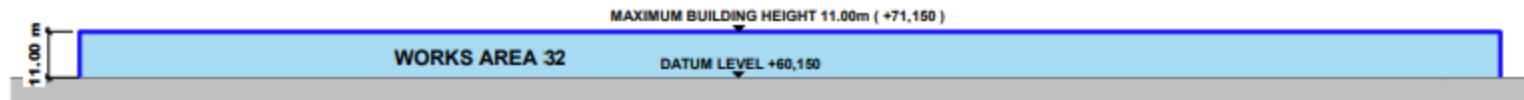
The western edge of the area is hard up against a line of trees which provide screening for nearby properties and the Grade 2* listed Charlwood House. According to article 6(1) of the draft DCO, the decked parking structure could be located hard up against the any of the blue work boundaries shown on the works plans.

Work No. 32 is one of the works listed in article 6(3) of the draft DCO. This means that in constructing it, the undertaker must not exceed the maximum heights shown and noted on the parameter plans (those heights being listed for information only in Schedule 13, mentioned above).

The parameter plans [\[REP5-018\]](#) show Work No. 32 on digital page 11 of 29 (Unique No. 20000-XX-A-XXX-GA-990106). A cross section is drawn diagonally south west to north west across the whole of the works area for Work No. 32 as follows:

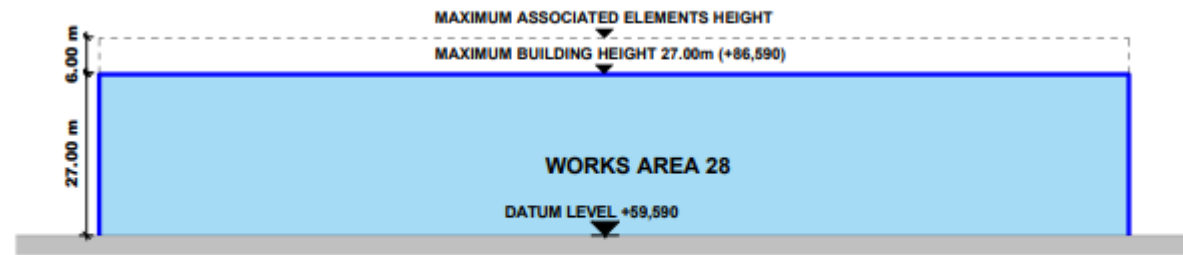


The maximum height across the cross-section is shown below:



This means that the whole of the decked parking structure along that cross-section, up to the western edge, could be up to 11 metres above datum level. In addition, as the Authorities understand it, any ancillary or related development of the type listed at the end of Schedule 1 to the DCO could be added on top of the structure, including (paragraph (e)) structures and plant, signage, CCTV poles and mountings, lighting poles and fittings “and any other permanent works required”. The Authorities note that for Work No. 28 (Car Park H Site), the parameter plans show, for “associated elements”, a dotted line above the maximum

building height level (see illustration below), and this is also noted in the relevant entry in Schedule 13. It is not clear from the DCO or the plans whether this means that the Applicant does not intend to provide any associated elements on the top of structures where no such dotted line is shown. This could be made clearer in the DCO, the parameter plans and in Schedule 13.



2 Parameter Height Section 2
1 : 750

So whilst Schedule 13 performs a function of illustrating what the maximum height of each of the buildings listed in it are, it does not provide any further detail or information about how those maximum heights could be further limited within the wide area within which the works can be constructed, taking into account the context of the surroundings. The Applicant would no doubt say that it requires maximum flexibility. But from the Authorities’ perspective, Work No. 32 (along with other works mentioned in Schedule 13) is not a “listed work” in Schedule 12, so there is limited scope for the local planning authority (in this case CBC) to influence the design, and in particular the height of the structure.

So in order to meet the Authorities’ concerns, there would need to be a change in which Schedule 13 is structured. For example, rather than it being simply illustrative of what the parameter plans say, instead it could impose detailed restrictions on the parameter heights at certain places within the works area and impose restrictions on what ancillary and related development may be constructed (if any) above the parameter heights for each work. Or the authorities’ objective could be achieved by changes to the works plans and/or parameter plans themselves, or to article 6 (limits of works) to the DCO, in the case of “associated elements”.

APPENDIX A

Design Note

Comments on Design and Access Statement - Appendix 1 -Design Principles (DP) Version 4 [REP5-031]

- 1.1 The Authorities remain concerned about the lack of detail contained within this key control document. As was stated at ISH8 (refer to ISH8 Post-Hearing Submissions), there is disagreement in approach to dealing with detailed design matters (referenced by the Applicant in Section 1.1.6). Further commentary on Annex A (the independent Design Advisor) is included at the end of this document.
- 1.2 The Authorities welcome the opportunity to meet with the Applicant and discuss design matters and concerns with the DP document prior to Deadline 7. It is considered imperative that this document is improved prior to the close of the examination for the reasons set out in response to ExQ1 GEN 1.21 [REP3-135].

General Structure and content of the DP document

- 2.1 In its current form and for the majority of the works, the Authorities do not consider that the information within the DP will give sufficient design control to ensure high quality design. While the Applicants state that Works will need to be in accordance with this document, there is currently so much flexibility with the loosely worded statements that the scale and appearance of the works could be wide open to interpretation and give little scope for the Authorities to influence the design of the structures. Two examples are provided below:
 - *DBF11 - "The design of the multi-storey car parking building will incorporate the following design features:
 - The facades will maintain open areas for natural ventilation.
 - Materials may include galvanized or painted metal frame or constructed in pre-cast or in-situ concrete.
 - Clearly visible entrance and circulation cores to aid intuitive wayfinding."*

It is not clear which Works this statement relates to and has therefore no reference to the surrounding areas or how the works design will respond to local context. It provides little detail on the car park design, and does not provide any certainty over materials stating it may be galvanised or concrete. It provides no detail on design quality.
 - *DDP12 - "Drainage requirements will consider no environmentally significant detriment to the water quality of the receiving watercourses." It is*

*not clear what this means and why is this only a consideration?
There should be clear targets and ambitions set out with the DP document.*

- 2.2 Paragraph 1.1.16 states that the design principles are a response to the 'Projects vision and objectives' but it is not clear from this document what those are or even where these are referenced in the wider DCO documentation. Volume 1 of the DAS [REP2-032] reference 3.1.1 sets out a project vision but none of these reference good design or any design ambition for the Project. These should be clear within the DP document.
- 2.3 The DP document is a rather confusing and does not follow any logical structure when discussing the various works and is hard to navigate. It is not grouped numerically by Works number or in order of works type for example Airfield works are DBF18-19 and at DBF44-53. A clearer structure to the document would be most helpful.
- 2.4 With no visuals or illustrations the document is a tricky read and there is still no sense of design quality or understanding of context through the identification of key features such as site constraints (such as trees, rivers or nearby residential properties), there is no design or palette of materials for the public realm. There is no aspirational language within the document which give any comfort to the Authorities of any design in terms of finish and sustainability being sought. Without any spatial illustrations the wording becomes convoluted. A good example is DBF10 which reads:
- " In order to limit visibility to Charlwood House, the design of Car Park X (Work No. 31) will:*
- Locate the decked parking provision in the eastern portion of the Works Area and ensure the decked parking is located to the north of retained vegetation (on the site's southern boundary) and not directly north of the site access.*
 - Limit tree and hedgerow removal on the site's boundaries where possible, other than as required to widen the vehicular entrance to Car Park X from Charlwood Road.*
 - Provide re-planting (of native trees and hedgerows) along the southern boundary to further screen views from the Listed Building (Charlwood House) and wider countryside, and minimise any light spill outside the site.*
- If a wider OS base plan was provided, it could provide clear reference to the important site constraints including the precise siting Charlwood House, identification of the important tree boundaries, the wider countryside and could provide clarity on the site access and position of the deck car park. This level of detail has been requested on previous occasions and full details of the concerns with this site and its relationship to other documents are attached as **Appendix 2** at the end of this document.
- 2.5 The document does not reference local design policies and guidance or reflect the important local design principles such as tree retention and

replacement which should be integral to the landscaping principles, it is considered that these general principles do need to be reinforced further and reference to address these policies included in the DP.

- 2.6 Design principle BF4 is a welcome addition to the document and would appear to address ENV9 in the Crawley Borough Local however the wording is recommended to be adjusted as follows: *"New buildings will be designed to maximise water efficiency and to meet the minimum standards for BREEAM 'Excellent' rating within the Water Category"*.
- 2.7 The Applicants should include a similar design principle to address local plan policy ENV6 which deals with sustainable design and construction.
- 2.8 While the Authorities have not been able to work through and suggest changes to the DP document line by line, some modifications to the wording have been suggested in Table 3 (Attached as **Appendix 3**)

Schedule 12 Works

- 3.1 The Authorities have reviewed the DP, in order to address **Item 5 Action Point 6** resulting from the Issue Specific Hearing 8, and have produced **Table 1** below which sets out the Works they consider should be listed within Schedule 12 and the reason for inclusion within the schedule.

Table 1 – Response to Issue Specific Hearing 8 – Action Point 6 – Commentary on additional works the JLA’s wish to see added into Schedule 12

Works No	Brief Description	Reason for addition to Schedule 12
1 (part)	Northern Runway (only in respect of those parts that involve surface or foul water drainage)* *Detailed approval under requirement 10(3) (surface and foul water drainage only)	While sufficient information is now provided in the Design Principles (DP)[REP5-031] to address the design appearance (R4), the drainage assumptions for the runway works have not been incorporated into the DP. It is the detailed drainage designs that remain of concern and would require further details for approval (R10). The Authorities’ suggestion is that the Table in Schedule 12 could be amended by using the asterisked note as shown.
4 – to be confirmed	Runways and Taxiways	Further design detail is needed on these works elements. DPF18 gives limited detail on drainage but no information on the rest of the works listed. There is no clarity on the design of this area.
6	Pier 7	This is a significant building (major scale development) which would be visible within the airfield and needs to be considered in terms of its design quality and sustainability measures
7 – to be confirmed	Oscar Area	This covers the same land as Works Area 8. There is no detail in DBF51 or DBD52 to explain what the design and appearance of these works would be and on indication on indicative layout. It is unclear if there are any implications for drainage.
9	Central Area Recycling Enclosure	Please see Table 2 (request for design review).

10	Motor Transport Facilities	Building up to 15.25m. Little information in DP on likely design and layout or on materials and finish. Mapping suggests tree /hedge loss and site intersected by a watercourse. No indication as to how these features would be safeguarded or addressed.
11	Grounds Maintenance Facilities	Issues that need to be addressed and specified as part of DP Possible issues with materials storage if hazardous or odour if composting – any design safeguards. No details on size or appearance of building other than it would be a portacabin. This is not considered high quality design given presumably the structure is a permanent building. No detail on the sustainability of the construction, justification for portacabins as appears to be permanent building. Visual impact likely to be limited.
12	Airfield Surface Transport Facilities	No detail in DP but parameter plans provide for building that would be up to 15m tall. No detail on appearance, visual impact or sustainability or how such a structure will address its surroundings. Potential to be visually prominent close to Perimeter Road South.
14	Fire Training Ground	The DP statement is vague on what works are proposed here DBF37 stating the works will 'involve the re-use and relocation of existing facilities as far as possible'. Can more information be supplied about what will be accommodated on this site and the likely structures heights materials etc? There is no information on likely layout or key considerations for such a facility. Will it be bigger than existing?
15	Satellite Airport Fire Service Facility	There are no details provided on the appearance of the facility in any control document which has a parameter plan which covers the entire area with the building up to 15 m high. There is reference to a main garage building in the DP - DBF39 which will be positioned near the taxiway. Further information is needed in DP to explain what the works in this area are likely to comprise of, an indicative layout and a palette of materials, sustainability of the building. Given visual prominence on edge of airfield this should be subject to design approval. From aerial photography it can be seen that St Michaels Church is approx. 180 m to the south, there is a nearby watercourse to the south, site is partially in a floodplain and east-west hedge line could be impacted.
16	Hangar	Please see Table 2 (request for design review).
17 To be confirmed	Hangar 7 support structures	There is no detail in the DAS or DP document explaining what structures are to be removed and from where and what structures are to be replaced and where. Further information is needed on what is meant by these works in order to understand if there are any design impacts. What is on the land currently, any loss of landscaping?
18	Western Noise Mitigation Bund	It is not considered that there is sufficient detail about this part of the works. The design principles need to reference the required acoustic performance of the bund and must ensure that details are provided to demonstrate the design meets the required standards. There should also be reference to the need for phasing plan and interim provisions to be agreed and put in place to safeguard properties during replacement of this existing bund with the new one. Mapping suggests feature is within floodplain and could impact upon one watercourse. TPO protected trees along northern boundary.

19 To be confirmed	Pumping Station 2a	There are no details about the design of these works in the DAS or DP. These need to be added and to demonstrate design is consistent with drainage strategy.
20 To be confirmed	Re-align Larkins Road	No design aesthetics to consider but further detail should be added to the DP to explain how the drainage impacts from the realigned road would be addressed in the design.
22 (d), and (g)	North Terminal Works	22(a) to (c) are already included in Schedule 12 and should remain Please see Table 2 (request for design review). Insufficient design detail at present
23 (c)	South Terminal Works	23(a) is already included in Schedule 12 and should remain Please see Table 2 (request for design review). Insufficient design detail at present
24	North Terminal Forecourt	Please see Table 2 (request for design review). Insufficient design detail at present
25	South Terminal Forecourt	Please see Table 2 (request for design review). Insufficient design detail at present
26	Hotel	Already included in Schedule 12 and should remain
27	Hotel	Already included in Schedule 12 and should remain
28 (b), (c) and (e)	Hotel , multi-storey car park and office	28(a) is already included in Schedule 12 and should remain Please see Table 2 (request for design review). Insufficient design detail at present
29	Conversion of Destinations Place to hotel	There is currently insufficient information in the Design Principles to safeguard quality design given no information on the design aesthetics just stating it will respond to the needs of the hotel rather than any reference to consideration of site context. This is a prominent part of the South Terminal and should be subject to detailed approval. There should also be some further scrutiny of sustainability energy performance etc.
30	Car Park Y	Please see Table 2 (request for design review). Insufficient design detail at present
31	Car Park X	Please see Table 2 (request for design review). Insufficient design detail at present
32	Decked Car Park	This DP for this site suggests an open deck structure and is unclear on the method of illumination. There is still no additional information provided to address the concerns raised about the visual impact of the lighting on Grade ii* Charlwood Park Farmhouse requested in table 7.1C [REP1-068] and explained in detail at paragraphs 7.40, 7.41, 7.46 and 7.50
33	Purple Parking	The concerns at this site relate to tree retention and screening. There is still insufficient detail in the DP to deal with concerns expressed in paragraphs 8.43 8.55 and 24.74 [REP1-068]
34	Car Park B	Should be subject to design detail approval given that the site is to be used initially as a contractor's compound and then laid out as open space
38	Museum Field	While there is an indicative landscape plan within the OLEMP, further detail will need to be considered of the drainage principles, land levels and profiles and the impact on ecology and flooding during and post construction. DDP16 seems very uncertain about the design approach to be adopted suggesting measures

		that could be done rather than providing any certainty about what is intended.
39	River Mole Works	The details set out in the DP statement are unclear. It not clear if DDP17 and DDP18 relate to these works or where the features referred to will be situated. It is unclear how these statements tie into the wider drainage strategy
40	Land North East of Longbridge Roundabout	<p>40(a) is already included in Schedule 12 and should remain</p> <p>The introduction of Schedule 12 (Non-Highway Works for which Detailed Design Approval is Required) is noted within the revised REP5 – 006/7 draft Development Consent Order (Version 7).</p> <p>MVDC is particularly interested in the reference to Works No 40(a) (the pedestrian foot bridge over the River Mole) and recognises that the amended dDCO would result in the separation of agreeing the design for the Replacement Open Space (ROS) element, from the footbridge, despite the two being unavoidably linked. Previously (REP4-054) the Council has expressed its wish to be the signing-off authority for the Landscape and Ecology Management Plan (LEMP) for the listed Works No.40 as the Local Planning Authority within which the ROS is located. The dDCO currently proposes that sign off should be obtained from CBC in consultation with MVDC and RBBC. It is the Council's view that, in the spirit of securing good and cohesive design, the sign off for both the footbridge and the ROS more generally should be undertaken by the same planning authority.</p> <p>That being said, it is recognised that the Applicant's approach to highlighting Works.No 40(a) specifically through the introduction of Schedule 12, and separately from the wider proposed LEMP process, does have some merit in terms of ensuring the that connecting footbridge can be achieved more swiftly if needed and in advance of the ROS. For this reason, the Council does not object to the inclusion of Schedule 12.</p>
41	Pentagon Field	Please see WSCC Deadline 6 response for further detail in response to REP5-078. There are currently insufficient details in the DP and other documents to control the works and landform proposed for this site.
42 – to be confirmed	Habitat enhancement, weir and fish pass	There are no details in the DP statement about these works , where the drainage feature will be positioned and what the drainage specifications will need to be.
43	Water Treatment Works	These works are in a sensitive location with archaeological, ecological and drainage constraints. Nearby properties mean issues such as noise and odour need to be address in the design detail. The Authorities consider the extent of the works are unclear from the description but the design principles as worded do not respond to these environmental constraints. More detail is needed in the DP document and to ensure these details are successfully implemented through a design approval process.
Additional Works Items		The following relate to the main contractor compounds which the JLA's suggest should be listed as Works in Schedule 1 and listed for approval under Schedule 12

	Main Contractor compound MA1	Requested added to DP. Works would be up to 25m high, cover an area of around 4 hectares have in excess of 500 parking spaces and provide accommodation for a workforce of circa 700 works. Visual impact over 14 year period.
	Airfield Satellite Compound	Requested added to DP. While visually away from nearby occupiers site is close to ecologically sensitive Brockley Wood and River Mole and is within floodplain. Further details needed to safeguard these environmental constraints to address matters such as layout, light spill, dust suppression, potential impact on watercourse.
	Car Park Z compound	Request add to DP. CBC mapping shows watercourse along SW boundary and site is partially within floodplain. Some landscaping along SW boundary. Adjacent to Lowfield Health employment area which also has hotel and St Michaels Church (latter is noise sensitive use and listed building) Layout needs careful consideration.
	Car Park Y Compound	Request to add to DP. There needs to be clear understanding how this compound use relates to other development planned for this site. Surrounding tree loss, ecological impacts and drainage impact along and visual impacts need to be fully addressed.
	South Terminal roundabout contractor compound	Request to add to DP. The proposed location of the compound will make it highly visible to users of the A23 London Road and nearby residential properties close to residents to the west of Balcombe Road.
	Longbridge roundabout contractor compound	Request to add to DP. Use of this area of land will require some clearance of trees/shrubbery and this should be clearly understood prior to starting on site to ensure this is done sensitively to minimise the impacts to properties and businesses within the vicinity as much as is practicably possible. While the content of REP4-040 is noted, the construction compound will be in relative proximity to a conservation area and care must be taken in terms of both the compound itself and the access.
	Car Park B compound	Request to add to DP. The layout should respect any existing trees and landscaping to be retained including that to be incorporated into the future Replacement Open Space. Appropriate access should be retained to nearby rights-of-way. The design should be sensitive to the residential properties at 92-98 The Crescent with regard to overlooking, privacy and noise. 24/7 access to the telecoms base station would need to be retained in the scheme.
	Reed Bed Compound	Request adding details to DP in connection with Works 43. Currently no detail on extent of this compound as while within DCO Project boundary this is not within works area. Layout need to address ecological safeguards, tree protection routing and be clear on visual impacts and duration. These works could be agreed as part of Schedule 12 approval for Works 43 but note this compound is not within the Works area.

3.2 Of those Works excluded from Table 1, it is considered that 3 of these require further detail to be provided either within the DP statement or on the Works plans these are:

- Works 5 – Aircraft Holding Area (Charlie Box) - There is limited detail in DBF47, it would be helpful to confirm that the relocated substations will remain within this works area. The Works plan area shown is quite extensive, it would be helpful if locations of the works were clearer. For example, where are the substations and de-icer storage tanks being located and what do they and what are these likely to comprise of in terms of size and appearance?
- Works 8 – Removal of airside supporting facilities - Work (f) the Emergency Traffic Control Tower prior to demolition is proposed to be recorded to Historic England Level 3 (given the rarity of the heritage asset) and this detail is to be incorporated into the West Sussex WSI, this amendment is still awaited. There are no other design detail issues with demolition works however, in respect of the Works plans for all these buildings that are being removed it would be helpful if the sub-elements for demolition can be identified.
- Works 13 – Rendezvous Point North - The DP statement would benefit from little more detail of the works layout and approximate site area. Are the portacabins single or double stacked? Aerial photography suggests a tree belt across site, can any assurances be provided on tree retention or replacement planting if these are removed?

Annex A: The Design Adviser's role and process

4.1 The Authorities welcome the introduction of a Design Review Mechanism into the DAS but have concerns about:

- the effectiveness of any review given the limited detail still provided within the design principles to inform the process.
- the limited scope of the Works Proposed to be subject to review;
- the mechanism for stakeholder engagement in the process and how truly independent the design review process would be.

The effectiveness of any review given the limited detail still provided within the design principles to inform the process.

4.2 The Authorities have raised extensive concerns about the lack of detailed plans and poorly worded description of works and it is considered imperative that any design review needs to be informed by a much more detailed Design Principles document. The improvement of the design principles document in advance of any decision on the DCO is essential as this control document should be seen as a key document informing any design review process, see response to GEN1.21 [REP3-135]. The effectiveness of any review depends upon the quality and content of the Design Principles informing it which, as has been explained above are still considered necessary to be further expanded upon. Due to the extensive nature of the works proposed the Authorities welcome the opportunity to highlight some major areas of concern at future meetings with the Applicant in order to see if the level of detail can be improved.

The Scope of Works to be subject of a Design Review.

4.3 The Authorities consider that the works to be subject to review are far too limited relating just to elements of the highway works and 3 of the 4 hotels. This will not ensure high quality design for the wider project and it is recommended that the scope of works is extended to pick up more of the major scale works which are either highly visible and /or adjacent to sensitive receptors or due to the use or operations of the structure has added design complexity. A detailed commentary of reasons is set out in attached **Table 2**. In summary it is requested that the following works are added into the design review process:

- Works 9 – Central Area Recycling Facility,
- Works 16 – New Hangar
- Works 22 and 24 – North Terminal alterations and forecourt
- Works 23 and 25 – Southern Terminal alterations and forecourt
- Works 30 – Car Park Y
- Works 31 – Car Park X

And modifications made to the extent of review for:

- Works 28 – Site of Car Park H
- Works 35, 36 and 37 – Highway Works

The mechanism for stakeholder involvement in the process and independence of the design process.

4.4 A design panel remains the Authorities preferred approach for the reasons stated in GEN 1.21 [REP3-135] and an agreed set of stakeholders which includes Local Authorities should form part of the process. The current proposal lacks detail on the remit of the Design Advisor and there needs to be further detail on how the design review process can be ensured to be truly independent. The scope and mechanism for engagement in the design process also needs to be explained in more detail. Further comment on this matter are set out in the post ISH8 Design Hearing Note for Item 5 – Good design also submitted at Deadline 6.

APPENDICES

Appendix 1 - Table 2 – Commentary on the Scope of Works to be subject to a Design Review

Works No	Description	Recommendation	Reason
9	Central Area Recycling Facility	Add to review	Although the CARE facility is not of significant scale, the design of waste management facilities is crucial to ensuring that the impacts associated with waste management (including but not limited to noise, odour, dust, vermin) are limited. The CARE facility will be subject to relevant environmental permitting, and it is assumed that these will operate effectively, however, it is crucial that due consideration is given to the likely impacts on the local environment (as set out in paragraph 7 and Appendix B, NPPW).
16	New Hangar	Add to review	This is a substantial structure up to 32 m high which will be visible from the both the airfield and the land to the north. The value of careful design can be seen with the more recent Boeing Hangar (subject to planning permission) which is considered to be a much higher quality and considered design in terms of scale and appearance than other hangar structures on the airfield. The new hangar is in very a sensitive location on the NW part of the Airfield close to the River Mole, it would benefit from further design consideration once the operator requirements are known. Please also see WSLIR, page 435 [REP1-068] and comments to Agenda Item 5 , ISH8 – Post Hearing Submissions.
22	North Terminal works (a) IDL extension - north (b)IDL extension – south (c) Baggage reclaim – extension (d) Autonomous vehicle station (f) reconfigure internal facilities (g) Multi storey car park G	Add to review	The North Terminal building is of a significant scale and is a major landmark for airport users. It is considered that a holistic approach to design should be adopted and all elements should be considered as whole. The approach to the terminal is a key feature in the public realm and often the first impression many passengers will have of the airport. The works will be much more visible in the short to medium term with the extensive tree loss proposed along the A23 to facilitate the highway improvements . There is so little information currently on the design and appearance of these works, it is considered that these should be subject to further scrutiny. It is suggested that works a, b, c, d and g are incorporated in a design review process along with Work no 24. The reconfiguration of the internal facilities while not development would benefit from

			being part of the brief as consideration is integral to the wider design approach to the building. [Car Park Y (see listing below) could be added to this grouping as it forms part of public realm around North Terminal].
23	South Terminal works (a) extend the International Departure Lounge on levels 10, 20, 30, and 40; (b) reconfigure internal facilities; (c) construct the South Terminal Autonomous Vehicle Station;	Add to review	The South Terminal building is of a significant scale and is a major landmark for airport users. It is considered that a holistic approach to design should be adopted and all elements should be considered as whole. The approach to the terminal is a key feature in the public realm and often the first impression many passengers will have of the airport. There is so little information currently on the design and appearance of these works, these should be subject to further scrutiny. It is suggested that works 23 (a),(c) and Works no 25 are incorporated in a design review process .The reconfiguration of the internal facilities while not development would benefit from being part of the brief as consideration is integral to the wider design approach to the building.
24	Upgrade to North Terminal forecourt including access roads	Add to review	See Works 22 above
25	Upgrade to South Terminal forecourt including access roads	Add to review	See works 23 above
26	Hotel north of MSCP3	Review	Agree with Applicant
27	Hotel on Car Rental Site	Review	Agree with Applicant
28	Works at car park H including Hotel, office multi storey car park and vehicle and pedestrian accesses	Modify to include all works (a), (b), (c) and (e)	Work area 28 is identified as a single area on both the Works and Parameter plans containing building works up to 27m high with an additional 6 metres (up to 35m) marked as 'associated elements' [REP5-018] drawing 990101 Rev P02. While the DAS volume 4 [REP3-035] shows an 'indicative' layout and separate buildings, the relationship between the elements is very important to the future users of all facilities. Given the visual prominence of this gateway site at the entrance to South Terminal it is important the public realm and relationship between these buildings is considered comprehensively. There are much better design solutions than the indicative blocks that are proposed and this site merits a much more thoroughly considered design approach.
30	Car Park Y earthworks, attenuation storage facility and multi storey car park	Add to review	This site while currently screened will be open and highly visible once all the trees are cleared as is proposed to facilitate the highway works . This leaves the site highly visible to road users and residents to the north and is on a gateway approach to the North Terminal. The resultant building is up

			to 27m tall and will be very visually prominent. It requires a bespoke design solution in order to be sympathetic to its setting.
31	Car Park X, earthworks, flood compensation area, outfall structure, access improvements, deck parking, surface parking	Add to review	This site occupies a sensitive location on the southern edge of the airfield with open countryside and residential properties including a Grade II* listed building immediately to the south. The resultant structure is up to 11m tall and currently is standard design. It requires a bespoke design solution in order to be sympathetic to its setting.
35	Highway works South Terminal Junction	Modify to include works (w) to (z)	The Authorities consider it is illogical not to consider the drainage works as part of the wider highway design. The visual impact of the proposed attenuation and pond (Works 35(y)) are integral to the design and appearance of the highway, junction and its setting in the wider public realm. A holistic approach should be taken considering all key elements.
36	Highway works to North Terminal Junction	Modify to include works (r) to (z)	The Authorities consider it is illogical not to consider the highway structures and drainage works as part of the wider highway design. The visual impact of the retaining walls and bridge structures along with the proposed attenuation and pond (Works 36(z)) are integral to the design and appearance of the highway, junction and its setting in the wider public realm. A holistic approach should be taken considering all key elements.
37	Highway works to Longbridge Roundabout	Modify to include works (m) and (n)	The Authorities consider it is illogical not to consider the drainage works as part of the wider highway design. The visual impact of the proposed drainage elements (Works 37(m) and (n)) are integral to the design and appearance of the highway, junction and its setting in the wider public realm. A holistic approach should be taken considering all key elements.

Appendix 2 - Detailed example illustrating where Joint Authorities consider there is a shortfall in detail with the Design Principles, OLEMP and other Control documents – Works No 30 – Car Park X

dDCO wording [REP5-005]

Works associated with Car Park X including—

- (a) earthworks and landscaping;*
- (b) construction of a flood compensation area with a capacity of approximately 55,000m³;*
- (c) construction of an outfall structure;*
- (d) access improvements;*
- (e) deck parking provision, a re-provision of Purple Parking;*
- (f) surface parking amendments.*

Works Plan - [REP5-016] – drawing 99006 Rev P03

This shows area of approximately 6.7 hectares (currently surface car park accessed to the north of the works site from Perimeter Road South. What is not visible from the submitted information is the tree belt along the south, the pockets of landscaping within the site including around the proposed site access (currently unused and marked by gate), the relationship with surrounding land outside of the DCO. Brook House detention centre is to the east, open countryside and listed building to the south, open land and watercourse to the west, perimeter road and edge of airfield to the north.

Parameter Plan [REP5-018] drawing 990108 P02

This shows an 11m high structure on eastern end, no information on western end of site. It is not clear if the overall height includes the lighting columns on the top deck.

Design Principles [REP5-031]

These state:

- *DBF8 The design of the decked car parking will incorporate the following design features: ▪ A naturally ventilated open façade with no external cladding. ▪ Materials may include a galvanised or painted metal frame, timber frame or constructed in pre-cast or in-situ concrete. ▪ Clearly visible entrance to aid intuitive wayfinding. ▪ Incorporate vehicular access and ramps, stairs and ticketing areas. ▪ The building form and structural solution will be cognisant of the scale and massing of surrounding buildings.*

This reflects the limited information in the main DAS, a basic metal deck frame, open, highly visible which takes reference from surrounding buildings (not other important landscape features or topography)

- *DBF9 The design of decked car parking and multi-storey car parking buildings will have regard to the following considerations: ▪ Level floor/ramp and ramped floor options. ▪ Security, safety, CCTV, slip resistance and low energy lighting. ▪ Blue badge holder parking. ▪*

Ventilation and smoke extraction. ▪ Charging points for electric vehicles. ▪ Renewable energy generation. ▪ Safe walking routes for pedestrians. ▪ Access control and ticketing. ▪ Cycle, scooter and motorcycle parking.

DBF10 seeks to address the Authorities concerns about the potential negative impact of the development the listed building of Charlwood House.

- DBF10 reads: *In order to limit visibility to Charlwood House, the design of Car Park X (Work No. 31) will ▪ Locate the decked parking provision in the eastern portion of the Works Area and ensure the decked parking is located to the north of retained vegetation (on the site's southern boundary) and not directly north of the site access. ▪ Limit tree and hedgerow removal on the site's boundaries where possible, other than as required to widen the vehicular entrance to Car Park X from Charlwood Road. ▪ Provide re-planting (of native trees and hedgerows) along the southern boundary to further screen views from the Listed Building (Charlwood House) and wider countryside, and minimise any light spill outside the site.*

These 3 bullet points still do not give sufficient comfort in relation to the development on this site. While the deck car park is now proposed 'not directly north of the site access', the parameter plan does not reflect this change REP5-018 (drawing 990109 PO2) and shows built form of up to 11m high immediately north of the site access. It is still unclear what level of setback from the site access is envisaged or can be construed by such wording. The open design proposed suggests a high degree of light spill out from the structure and through the tree screen from within the deck and the lighting on top. This is harmful to the visual amenities of the area.

The Authorities are concerned with tree loss along the southern boundary of this site not just by the listed building but given the importance of this tree screen to provide a green buffer between the edge of the airport and the countryside to the south. Limiting removal where possible is very loose wording and while replanting is welcomed, this is not considered a robust enough control for this sensitive boundary edge. The Authorities wish to see the effective screening for the car park from not just the listed building but visual impact of the development (including any light spill) from the wider countryside to the south.

Past responses provided by the Authorities have requested further clarification on parameters due to extensive excavation works proposed para 8.43 and 24.65 [REP1-068] and a request for additional detail to be added to the works plan such as a clear indication of the access point and the position of the drainage feature. The most recent commentary on this site was provided in response to ExQ1 HE.1.2 [REP4-065]. This extent of built form on the eastern portion of the works site is also shown on **Figure 1.1.1 in the OLEMP [REP4-012]**. The wording in this document talks only of 'consideration of opportunities for new planting' and does not address the importance and need to retain this southern landscaped boundary. There are inconsistencies in language between these documents.

There are also inconsistencies with the tree removal information. The tree removal plan for the **Car Park X Appendix 8.10.1 Sheet 12 of 13 [REP3-041]** is confusing to understand as the key does not assist in identifying clearly which of the trees surveyed are being removed. The extent of tree loss along the southern boundary to form the widened access is unclear as this does not appear to correspond with the current access. The Authorities would like a clear survey drawing for this site showing individual trees (not broad groups) and clearly identifying which ones would be removed. The current drawing is not on a clear Ordnance Survey base and therefore the site relationship with surrounding features such as Charlwood House cannot be readily established.

There are also concerns that the height of any works for the drainage features, earthworks and landscaping or lighting or fencing for the remaining western part of the site which would be for surface car parking and drainage attenuation are not described in any detail. There are no drainage design principles for this engineering feature. The **Project description [REP1 – 016]** suggests a lowering of ground levels of the car park by up to 2 metres to create a flood compensation area paragraph 5.2.182 but later in the document the language suggests the flood compensation area is 'beneath' car park X paragraph 5.3.47. It is unclear whether these works would be visible, how the site may be reprofiled and to what extent they may be screened by or impact upon any landscaping or roots of any trees to be retained. There is no detail on the widened and reopened access and this unclear from the dDCO description of works [REP5-005] (considered misleading as the access while present is not currently in use and is quite concealed within the current hedge line).

The Authorities wish to see more design details and principles for this sensitive location. A clearer plan showing the tree boundary, trees to be retained and listed building would aid interpretation. A commitment to provide robust tree boundary of sufficient depth and height to screen the car park beyond is also requested. It seems reasonable to the Authorities that these important design principles could be tied to a more detailed layout plan to be agreed as a control document and for more design principles to be included to add certainty to the visual impacts.

APPENDIX 3 – Suggestions to DP Wording

Principle	Current wording	Comments /Proposed Changes
L2	Tree and shrub planting will be provided within built-up areas (such as car parks) to reinforce retained tree lines and across the Project. The landscape planting will include a variety of native trees and shrubs and wildflower grasslands.	New line after grasslands; 'An integrated irrigation system will be included to ensure that new planting survives dry periods.'
L4	Vegetation retention proposals for all elements of the Project will be designed to: <ul style="list-style-type: none"> ▪ Ensure existing vegetation is retained wherever possible and adverse impacts on the important features and locally distinctive patterns of development at Gatwick Airport are minimised. ▪ Minimise adverse impacts on the character of surrounding landscapes and townscapes. 	Second bullet 'Minimise' requires further clarity Change to: 'Minimise adverse impacts on the character of surrounding landscapes and townscapes during construction and early planting phases. By 2047 full restoration and improvement of

	<ul style="list-style-type: none"> ▪ Prevent the coalescence of the airport and settlements of Crawley and Horley. ▪ Ensure that visually significant vegetation is retained to minimise adverse effects on visual receptors, heritage assets, protect important views and protect the natural beauty and setting of the AONBs and the National Park 	<p>landscapes and townscape will be achieved.</p> <p>Bullet 3 Issue of Coalescence of settlements is local plan matter. Should be removed and replaced with 'Restoration of Green Barrier along A23 London Road and M23 Spur Road separating south Horley from the airport and related infrastructure.'</p>
L6	<p>Proposed woodland, tree, scrub, shrub, wetland, amenity and grassland planting will be designed to:</p> <ul style="list-style-type: none"> ▪ Ensure a high quality environment is created within Gatwick Airport and its surrounding landscape/townscape. ▪ Provide replacement/compensation planting where vegetation would be removed, particularly as a result of surface access improvements within and adjacent to the A23/M23 Spur corridor. 	<p>New bullet</p> <p>New planting will be well integrated with existing green open spaces and create enhanced habitat corridors.</p>
BF1	<p>All new buildings constructed as part of the Project will be designed and constructed to achieve Net Zero emissions during operation.</p>	<p>After 'operation' add; 'including scope 3 emissions.'</p>
BF2	<p>Detailed design will consider how to reduce reliance on the energy grid during prolonged warmer/colder seasons and more extreme temperature events, particularly low carbon heating and cooling systems and ventilation systems. It will also consider measures to reduce water use and increase re-use across new buildings.</p>	<p>Remove 'will consider how' and replace with; 'incorporate technologies to reduce reliance...'</p>
BF3	<p>The design of buildings should consider the implementation of design measures/features to manage the risk of extreme storm events, flood events and heatwave related drought events.</p>	<p>Replace 'should consider the implementation of' with 'will include'</p>
DBF26	<p>The permanent lighting design as part of the Longbridge Roundabout highways improvements will consider the proximity to the Church Road (Horley) Conservation Area.</p>	<p>Consider is too loose a term. After Conservation Area add; 'and seek to minimise light spillage from the highway into Church Meadows and Riverside Garden Park.'</p>
DBF27	<p>The extent of vegetation clearance and planting as part of the Longbridge Roundabout highways improvements should be designed to avoid visual impacts on views across the Church Road (Horley) Conservation Area</p>	<p>Add after Conservation Area; 'and adjacent residential properties the west of Woodroyd Avenue and Longbridge Road.'</p>
DLP1	<p>The design of open space should be easily accessible by all groups of people. The design of the open space should consider the needs of different groups of people, such as families with children, older adults, and people with disabilities.</p>	<p>Replace 'such as' with 'including'</p>
DLP8	<p>In the design of the Church Meadow Replacement Open Space, the repositioning of the footbridge over the River Mole will be considered either downstream of the meander or with a wider bridge span to</p>	<p>Noted but concerned that the footbridge location has not been finalised by this stage.</p>

	avoid the risk of erosion outside the meander bend.	
Additional Principles	It is noted that as present that there are no design principles for bridges and elevated structures.	Include a set of design principles for bridge and elevated structures, considering the shape, materials, finishes, elevations, lighting and relationship with features the elevated structure is spanning and the wider landscape context.