

Gatwick Northern Runway Project – Further Consultation: Response from West Sussex County Council, July 2023

Introduction

1. West Sussex County Council (WSSCC) welcomes the opportunity to comment on the further round of targeted consultation Gatwick Airport Limited (GAL) is undertaking, in response to further design work developed since the Autumn 2021 consultation.
2. This response is not on behalf of other Districts and Boroughs within the County, and only addresses the statutory element of the consultation i.e., the highway design changes, raising areas of concern about potential adverse effects relevant to West Sussex. Technical feedback on the non-statutory elements, i.e., the project refinements, will be made through continued engagement with GAL, including through the Topic Working Groups.
3. Details on the approach to this consultation was received from GAL on 3 May 2022. WSSCC is disappointed that the feedback given on 12 May 2022, including the additional consultation material requested (e.g., Updated Preliminary Transport Assessment), and the widening of the Highways Consultation Area to cover Charlwood, Crawley and Horley, was not incorporated into the final approach taken by GAL.
4. WSSCC Officers have reviewed the materials published as part of the consultation, and a summary of key concerns is given below, along with a table of more detailed comments in Appendix A. The key areas of concern relate to the following topics:
 - Highways
 - Ecology/Arboriculture; and
 - Public Rights of Way (PRoW)

Highways

5. WSSCC has a number of concerns about the proposed highway mitigation. The proposals have not incorporated sufficient additional measures to make using sustainable modes of transport a more attractive option for staff and passengers than using the private car. Therefore, they are unlikely to support the achievement of the proposed surface access mode share targets.
6. Although the proposed highway mitigation and the assessments of environmental impacts also appear to be dependent on departures from standards and/or traffic regulation orders, it is disappointing that details of these aspects of the proposals have not been provided in the consultation materials for stakeholders to comment on.
7. WSSCC is concerned about the safety of the proposed highway mitigations as it is not apparent from the consultation materials what design standards have been applied or whether they accord with these standards. The assessment of impacts appears to be dependent on changing the speed limit on a section of A23 from

50mph to 40mph, which will be subject to a separate consultation process (a Requirement within the DCO), the outcome of which cannot be guaranteed.

8. WSCC is concerned about the performance of the proposed highway mitigation, which has not been demonstrated through a transport assessment. The proposed highway mitigation 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. However, it has not been possible to assess this due to the lack of information provided. The proposed highway mitigation would also create new assets that WSCC are not currently sufficiently resourced to maintain.

Ecology/Arboriculture

9. It is apparent that further extensive vegetation loss is proposed as part of these highway proposals. Loss would occur, not just through direct land-take required for operational footprint, but also through temporary construction works. For example, the hedgerow and mature oak trees that define the field boundary immediately north of the Sussex Border Path would be removed to accommodate the temporary construction works, resulting in the loss of an important landscape feature. It seems disproportionate that a mature, important landscape feature like this should be lost permanently for temporary works. If there is no alternative to their removal, the trees should be replaced on a 2:1 basis.
10. Concern is raised over not just the area or extent of vegetation that would be lost, which is significant, it is the entire habitat itself that would be lost, including soils (and all other ecosystem service benefits), together with loss of connectivity at a landscape scale. This particular stretch of highway (the whole project boundary), squeezed between the Airport and Horley, is a vital east-west linear connection with the wider hedgerow / woodland network either side of it. It is not clear how all this additional vegetation loss would be compensated for, or how Biodiversity Net Gain (BNG) would be achieved, given the previous concerns raised in comments on the PEIR. Land-take must be reduced where possible, and the design of temporary works developed to try and avoid the loss of sensitive habitats.
11. The River Mole crossings, road widening, new pedestrian and cycle links, temporary works compounds, temporary access and other works could all impact on ecology. However, it is difficult to assess potential ecological impacts without reference to ecological survey information, such as an Extended Phase 1 Habitat Survey. These revised highway scheme proposals are not accompanied by any ecological information or a suitable level of cross referencing to the original PEIR. Concern is raised that the previous ecological surveys boundary presented to stakeholders does not cover the required land-take for these proposals.
12. Opportunities to provide ecological enhancements should be sought. These might include reduced (or more directional) road lighting around bridges over the River Mole (to improve bat corridors), re-profiled watercourses, wildlife-friendly design of new drainage ponds, creation of wildflower meadows/road verges on subsoil/nutrient poor soil, and the provision of bat boxes and grey wagtail nest boxes/ledges beneath bridge structures.

Public Rights of Way (PRoW)

13. There is very little detail about potential impacts on PRoW and while there is no PRoW strategy in place, it is difficult for WSCC to understand the full implications on the existing PRoW network.
14. There are also a number of references to temporary diversions to accommodate the development works. Temporary diversions should be suitable for lawful users and well-signposted. There are also various references to linking footpaths in public open spaces and it would be useful to know whether there is an expectation to dedicate them as Definitive PRoW or whether they would be managed by third parties.
15. In principle, WSCC support improvements to the existing network and enhancements to encourage sustainable transport and connectivity to open spaces; however, how these changes interact with the existing PRoW network and the highways network have not been made clear. WSCC cannot, therefore, provide any level of meaningful response without the required evidence base, including a detailed PRoW strategy.

Conclusion

16. The lack of technical detail presented by GAL does not enable WSCC to understand whether the highway design is acceptable from a safety perspective. This is because there is no detail about which design standards have been applied or whether any associated changes are required to speed limits to mitigate safety concerns. Furthermore, there is a lack of sufficient evidence to support conclusions drawn regarding impacts and proposed mitigation.
17. Therefore, WSCC is not able to support these proposals until further technical traffic and environmental information is provided, in order to be able to fully understand the impacts of the proposals. WSCC will continue to engage with GAL to enable the best possible outcomes for local communities and other sensitive receptors in West Sussex.

Appendix A: Detailed Comments

This appendix sets out detailed comments from West Sussex County Council (hereafter referred to as 'WSCC') on the Gatwick Northern Runway Project Summer 2022 Consultation Document, including updated Preliminary Environmental Information (PEI), published by Gatwick Airport Limited (GAL) on 14 June 2022.

The following table only addresses the statutory element of the consultation i.e., the highway design changes, raising areas of concern about potential adverse effects relevant to West Sussex. Where applicable, reference is made to specific paragraphs/tables.

NB: It does not include comments on behalf of the District or Borough Councils in West Sussex.

Ref	WSCC Comment
	Section 2: Highways Improvement Changes
2.2.8	It is not clear what design standards have been applied and whether the proposals comply with those standards. WSCC is concerned that the proposals cannot be delivered without departures from standards, which may not be acceptable from a highway safety perspective. GAL should provide a design audit that explains which standards have been applied, compliance with those standards, and identifies the need for any mitigation or departures from standards (which would need to be approved by the relevant highway authority).
2.2.9	Although the proposals do not mention changes to speed limits, the assessment of environmental impacts (as shown in Table 3.1.8) appears to assume that the speed limit on A23 London Road would be reduced from 50mph to 40mph. Why has GAL not disclosed the full details of the proposed highway changes that have been used to inform the environmental assessment as part of the further consultation? When will these proposals be presented for consultation with stakeholders?
2.2.9	The proposed design changes are noted. However, the performance of the proposals has not yet been demonstrated through use of transport models or other suitable tools. WSCC is concerned about the impacts of the proposals on congestion, journey times between Crawley and Horley (including emergency response times) and redistribution effects across the wider network (including moving traffic from the trunk road network on to local roads). GAL should provide transport modelling evidence to demonstrate that in highway capacity terms, the proposals offer an acceptable solution.
2.3.1	The rationale for reclassifying the M23 spur to an 'A' class road is not clear. There is the potential for this action to reduce the attractiveness of using this route and increase use of A23 or A217, which would have the same classification. GAL is requested to explain the rationale for reclassifying the M23 spur and clarify whether the road would remain part of the Strategic Road Network and Primary Route Network.
2.3.1	The proposals have missed potential opportunities to enhance sustainable modes of transport and appear to be relying solely on bus and coach operators to react to demand, rather than proactively identifying investment in shared travel. WSCC is concerned that the proposed mitigation is too focused on providing for vehicles (including parking provision) and that there is not enough focus on sustainable modes of transport, and that, as a consequence, the sustainable transport mode share targets for passengers and staff would not be achieved.
2.3.2	South Terminal Roundabout (2): A new drainage pond is envisaged as a permanent feature to the north-east of the roundabout. There may be opportunities to enhance biodiversity through the design, creation, and management of this pond.

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2.3.3	Land north of the South Terminal Roundabout forms part of the Horley Business Park site allocation. It is not clear whether the proposals align with the emerging plans for the business park. GAL should demonstrate that the proposals will not preclude the development from coming forward in line with the statutory development plan for the area.
2.3.10	North Terminal Roundabout (4): There may be opportunities to enhance biodiversity through the design, creation, and management of the proposed new drainage pond.
2.3.11	It is mentioned that there would be considerable loss of vegetation from within the highway boundary. Although it is stated that this would be replaced, there is currently no information on how and where. Opportunities to enhance biodiversity should be sought, e.g. the creation of wildflower meadows on subsoil/nutrient poor soil.
2.3.12	No traffic modelling has been presented for the traffic signals to demonstrate that three right-turning lanes with one left-turn lane are appropriate. GAL is requested to provide evidence that the proposed lane allocations and queuing capacity at the A23 junction would not result in queuing through the North Terminal roundabout; this would be a highway safety issue.
2.3.12	Although the proposed signing for southbound A23 traffic to North Terminal would be via South Terminal junction (as it is today), satellite navigation systems are more likely to route traffic via the A23 Queens Gate junction, as this is likely to offer a better journey time. It is not clear whether the A23 Queens Gate junction would have sufficient capacity to cater for the volume of traffic that would be likely to use it or the impact that these movements would have on other users of A23 London Road, including buses. GAL is requested to provide evidence that the design includes sufficient capacity for traffic to queue at the A23 Queens Gate junction without queuing into the southbound straight-ahead lane (which would be a highway safety issue), and the impacts on journey times (including buses) between Crawley and Horley.
2.3.12	The proposed noise barrier between A23 and Riverside Garden Park would be challenging and expensive for WSCC to maintain. GAL is requested to demonstrate how the proposed structure would be inspected and maintained, ideally without the need for lane closures on a busy section of the road network.
2.3.13 and Appendix 4 Table 3.1.3	A23 London Road (5): There is no mention of potential ecological impacts resulting from the proposed widening of the highway bridge over the River Mole, other than those during construction. There could be impacts due to increased shading of the watercourse and marginal vegetation, and a greater barrier to the movement of wildlife, including bats, under a wider bridge. Reference is made to a rights of way strategy, which would include a new pedestrian and cycle link between North Terminal and Longbridge Roundabout. No further details are

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	given so it is not possible to assess any potential ecological impacts upon habitats and species.
2.3.13	Reference is made to a PRow strategy; when will this be available for WSCC to review?
2.3.13	This section refers to a cycle/pedestrian link between North Terminal and Longbridge Roundabout and a new pedestrian link between Longbridge and Riverside Garden Park. Why is the second of these links not considered for shared pedestrian/cycle use? The more shared routes the better in terms of connectivity and promotion of sustainable transport. Another thing to consider is the status of the new routes. For cycles to use a PRow, it would need to be a Bridleway, which would also allow equestrian use. Therefore, are these routes going to be PRow or if simply for cycle use, would they be adopted as formal cycle routes?
2.3.13	WSCC is concerned about the deliverability of the proposed carriageway widening over the River Mole as the current structure would not be easy to extend and constructing a replacement structure would require significant disruption to traffic. GAL needs to demonstrate that the proposals are technically buildable in this location and the construction impacts are manageable.
2.3.15	Longbridge Roundabout (6): The crossing of the River Mole would result in some loss of vegetation. This is likely to be ecologically sensitive and will require very careful consideration and design.
2.3.16	It needs to be demonstrated that there is adequate weaving space for traffic joining the A23 westbound, that then wants to u-turn and travel eastbound.
2.3.17	A23 Brighton Road (7): The new bridge structure crossing the River Mole is likely to be ecologically sensitive and will require very careful consideration and design.
Table 2.1	<ul style="list-style-type: none"> • M23 Spur – Reference to FPs 367 and 381; however, these paths are not correctly numbered as 381 doesn't exist and 367 is in the southern area of the County. Numbers need to be clarified so they are accurate. In principle, the proposals here are not opposed to and WSCC welcome that mitigation is being considered to reduce the impact on lawful path users. • M23 Spur – Suggested diversion of up to 500m referred to. Although it is welcomed that an alternative is being proposed, the PRow strategy should set out how impact on users will be minimised and details around alternative routes. • Airport Way – reference to FP360/360sy. Although 360sy appears to be correct, reference 360 is not. Does this relate to the same path or is it supposed to refer to a different path to 360sy? Further clarification is needed. • Airport Way - Suggested diversion of up to 500m referred to. Although it is welcomed that an alternative is being proposed, the

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	<p>PRoW strategy should set out how impact on users will be minimised and details around alternative routes.</p> <ul style="list-style-type: none"> • Airport Way – reference to FP355a. This path does not exist so clarification on reference number is required. Furthermore, there is reference to cyclists being diverted along this route and that they would have to dismount. Clarification is required about enforcement of the dismount because if this does not happen, it could lead to long term conflict on the footpath. This detail should be included in the PRoW Strategy. • Longbridge Roundabout – reference to a shared footpath/cycleway east into woodland. Clarification is needed whether this is to be a PROW or remain a Highways asset.
	Appendix 4: Updated Preliminary Environmental Information
General	<p>WSCC have comments on the following tables within Appendix 4. It should be noted that accurate cross-referencing to baseline information in the original PEIR would have better aided understanding the potential effects. There is also a lack of sufficient evidence to support conclusions drawn across a number of topics.</p> <ul style="list-style-type: none"> • Table 3.1.1 Historic Environment • Table 3.1.2 Landscape, Townscape and Visual Resources • Table 3.1.3 Ecology • Table 3.1.4 Geology and Ground Conditions (no comments) • Table 3.1.5 Water Environment • Table 3.1.6 Traffic and Transport (comments included in the table above) • Table 3.1.7. Air Quality (no comments) • Table 3.1.8 Noise and Vibration (no comments) • Table 3.1.9 Climate Change and Carbon (no comments) • Table 3.1.10 Socio-economics (no comments) • Table 3.1.11 Health and Wellbeing • Table 3.1.12 Agricultural Land Use and Recreation
Table 3.1.1	<ul style="list-style-type: none"> • M23 Spur - This section of the route has proposed additional temporary and permanent land take, much of which is located outwith the existing carriageway and some areas are within previously undisturbed land. There is the potential for impacts on as-yet unidentified heritage assets of archaeological interest. • North Terminal Roundabout - The impact of the proposed noise barriers on designated heritage assets (which might arise through changes in their setting) has not been assessed. There is, therefore, a lack of evidence to support the statement '<i>There would be no new or materially different significant effects as a result of this change compared to those reported in the PEIR</i>'.

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	<ul style="list-style-type: none"> • A23 Brighton Road - The proposed additional land take here may have the potential for impacts on as-yet unidentified heritage assets of archaeological interest. • This statement has not been evidenced within the consultation document (nor referenced back to the relevant sections of the PEIR, where appropriate). The potential for additional significance effects and/or increased severity of already identified effects (as compared to PEIR) remains a possibility until demonstrated otherwise.
General	<ul style="list-style-type: none"> • The additional areas of land-take proposed are, for the most part, located within the existing carriageway or verges, or within areas that have been previously developed. However, there are also some areas of proposed additional land-take that would be located within undeveloped land. The archaeological potential of these areas has not been assessed and there is, therefore, some potential for harm to as-yet unidentified heritage assets of archaeological interest. Given the limited size of these areas, even in the event that they do contain additional archaeological features, the likelihood that this might increase the significance of effects already identified at PEIR stage is considered low. It is anticipated that any additional archaeological features located within these areas of proposed new land-take could be dealt with via standard archaeological mitigation methodologies, according to industry best practise. The proximity of the additional areas of land-take to existing carriageway or development should not be taken to automatically imply that these areas have low or no archaeological potential. Assessment of archaeological potential and the need for mitigation should be assessed on a case-by-case basis. • The impact of the proposed noise barriers on designated heritage assets (which might arise through changes in their setting) has not been assessed. With regards to changes to the settings of heritage assets within the study area, the consultation has not clearly demonstrated or evidenced that (a) no additional heritage assets would be subject to harm and (b) no additional harm to any receptors (i.e., that the significance of effect is demonstrably no greater than that assessed at PEIR stage). The consultation document (Appendix 4) states, "<i>There would be no new or materially different significant effects as a result of this change compared to those reported in the PEIR</i>". However, this statement has not been evidenced and the potential for additional significance effects and/or increased severity of already-identified effects (as compared to PEIR) remains a possibility as far as WSCC is concerned.
Table 3.1.2	<ul style="list-style-type: none"> • It is apparent that further extensive vegetation loss is proposed as stated in the consultation document at various points and particularly in table 3.1.2, which analyses the significant effects on landscape, townscape and visual resources compared to the PEIR. Concern is drawn for example to the M23 spur, where new significant effects that would be major adverse in the long term has

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	<p>been assessed. The hedgerow and mature oak trees that define the field boundary immediately north of the Sussex Border Path would also be removed to accommodate the temporary construction works, resulting in the loss of an important landscape feature. It seems completely disproportionate that a mature, important landscape feature like this should be lost permanently for temporary works, and further justification for this should be given. If there is no alternative to their removal, the trees should be replaced on a 2:1 basis.</p> <ul style="list-style-type: none"> • Other areas of concern for this vegetation loss include: <ul style="list-style-type: none"> - South Terminal: new significant effect that would be moderate to adverse in the long term – removing mature vegetation; - A23 London Road: the Riverside Garden Park would be impacted by permanent vegetation removal at various widths: 8m, 9m and 13m in width; - Longbridge Roundabout - greater extent of vegetation removal required, up to 45m width. • It is not just the area or extent of vegetation loss that is significant, it is the entire habitat itself which is lost, including soils (and all other ecosystem service benefits), together with loss of connectivity at a landscape scale. This particular stretch of highway (the whole project boundary), squeezed between the airport and Horley, is a vital east-west linear connection with the wider hedgerow / woodland network either side of it. It is not clear how all this additional vegetation loss would be compensated for, let alone BNG achieved, given the previous concerns raised in comments on the PEIR. • An updated Zone of Theoretical Visibility (ZTV) showing the proposed changes to theoretical visibility caused by the new highways proposals (including the proposed noise barrier and removal of extensive vegetation along the road corridor) and the implications for visual impacts to receptors within proximity of the changes, needs to be presented to stakeholders to allow for meaningful discussions on viewpoint locations and photography undertaken by GAL.
Table 3.1.3 General comments	<ul style="list-style-type: none"> • The crossings of the River Mole, road widening, new pedestrian and cycle links, temporary works compounds, temporary access and other works could all impact on ecology. However, it is difficult to assess potential ecological impacts without reference to ecological survey information, such as an Extended Phase 1 Habitat Survey. These revised highway scheme proposals do not appear to be accompanied by any ecological information. Referring to information provided within the Autumn 2021 consultation, the extent of the Phase 1 Habitat Survey, shown in Figure 9.6.3 does not appear to cover all of the new land-take requirements. Confirmation is also needed if the species survey covers the land requirements these proposals suggest.

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	<ul style="list-style-type: none"> • Opportunities to provide ecological enhancements should be sought. These might include reduced (or more directional) road lighting around bridges over the River Mole (to improve bat corridors), re-profiled watercourses, wildlife-friendly design of new drainage ponds, creation of wildflower meadows/road verges on subsoil/nutrient poor soil, and the provision of bat boxes and grey wagtail nest boxes/ledges beneath bridge structures.
Table 3.1.5	<ul style="list-style-type: none"> • The proposals for South Terminal Roundabout shows a schematic detail of the Highway Improvement changes, fig 2.3 shows the proposed new surface water pond, and 2.3.3 made mention of substantial modification to an existing pond on airport land south of Airport Way, which would be carried out as part of the Project. The design parameters must be in accordance to the SuDS manual for the new pond if this proposal is taken forward, as well as the changes that would be carried out on the existing pond, the impact, and proposed mitigation measures. • As part of the changes to the Airport way, a third lane has been added to the westbound Airport way providing extra capacity and resilience. GAL would need to confirm to what extent this proposal would increase the existing impermeable area and how this would be mitigated.
Table 3.1.11	<p>The initial comments on the PEIR, particularly those regarding the lack of sufficient evidence to support conclusions drawn, still apply. Evidence used to substantiate assumptions should incorporate feedback from communities that are likely to be impacted by the project. Further, where it is anticipated that diversions would increase walking journey times (as is the case with the M23 Spur), further thought should be given to the following questions:</p> <ul style="list-style-type: none"> • What type of pedestrians use the road and for what purposes? • Would the diversion cause 'acceptable walking distances' to be exceeded and how would this impact on the population? • Though the report claims that expected increases in walking journey times are not considered to be 'onerous' and would contribute to physical activity levels, it is also possible for longer journey times to discourage people from active travel - having a negative and perhaps rebound impact on active travel. There is insufficient information to allow an understanding of the conclusions made around this. • Will the diversions have disproportionate impacts on certain groups? For example, individuals from low-income households who may be more likely to travel by foot to work? For these groups of individuals, a 20min increase in walking journey time would be significant.
Table 3.1.12	WSCC expect GAL to continue engaging with all relevant stakeholders to minimise the overall land take (and therefore associated environmental impacts) required for these proposals.