



GATWICK AIRPORT NORTHERN RUNWAY PROJECT (NRP): APPLICATION FOR ORDER GRANTING DEVELOPMENT CONSENT - FINAL SUBMISSION FROM HORLEY TOWN COUNCIL TO THE EXAMINING AUTHORITY (EXA)

We refer to our previous response concerning the Northern Runway Project (NRP) by Gatwick Airport Ltd to bring the northern runway into dual use and the examination of the DCO Application by the Examining Authority (ExA) currently underway. We attach a copy of our previous submission and wish to avail of this further opportunity to make our additional comments to the proposals, under the following key headings:

Noise:

Horley Town Council remains very concerned about noise and dust impacts from the construction phases to our residents in the south of Horley. In our response to the PEIR, we requested more details on the scheme to re-locate those residents suffering the highest noise levels. We note that this is still the intention of Gatwick Airport Ltd (GAL) but we would request that the Planning Inspectorate seeks commitments from GAL on matters such as the type of alternative accommodation. For how long would this last and who covers all the costs? The airport must take into account children's schooling and the work commitments from adults when choosing the locations of the temporary accommodation.

We have been informed that GAL plans to have a concrete crusher located in 'car park Y', off the northern perimeter road. There is however no reference to this in the DCO documents so, if the information is correct, we would request the following information:

1. The intended hours of operation.
2. Anticipated noise levels generated by this plant when in operation.
3. Anticipated noise levels for the residents in the Longbridge Walk area.
4. Assessment on noise impacts to the adjacent hotels.

We would ask that an alternative 'on airport' site be considered such as the former maintenance area to the south of the main runway which would have less impact on local communities.

Additionally, although initially offered, but subsequently withdrawn, we would wish to see a noise barrier erected on the eastern side of the A23 from the Longbridge Rundabout to the proposed new junction serving the north terminal.

In 14.9.142, reference is made to newly overflowed areas. This appears to contradict GAL's statements that the northern runway would use existing flight paths. We would therefore like to see map based evidence of the affected areas.

Noise Envelope:

We note under 14.13.29, it is proposed that CAA be a body to review the performance of a noise envelope. As such, we would wish to see this role undertaken by the local authorities as we suggested at the Noise Envelope Group meetings in 2022.

Surface Access:

Based upon the evidence made available by Gatwick Airport, which we have scrutinised very closely, we have serious concerns going forward that the transport links i.e. rail, motorway and local road network will not be able to support the proposed growth in passenger and staff numbers.

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With GAL's commitment to have passengers and staff access the airport via public transport, we have concerns about the railway capacity to meet the growth in the number of passengers with the knock-on effect on commuter trains serving stations from Horley to London. We understand that there are no plans to introduce more tracks and funding for network improvements in the Croydon/Windmill Junction has never been secured. Is Gatwick able to assure us that, regardless of the demand on rail capacity to support Gatwick's growth, there will be no negative impacts on commuter services, both locally and to London?

Horley has for many years and continues to be blighted by airport passengers parking in residential roads, so we are very concerned about the potential for this to worsen significantly with increases in passenger numbers. We note that the airport proposes to increase capacity for on airport parking. However, our view is that Gatwick can provide any number of parking spaces, but if not priced at an affordable rate, then passengers will continue to look at off-airport options, including our residential roads.

Water Environment:

Further to our concerns expressed in our response to the PEIR on the capacity of the Horley Sewage Treatment Works (HSTW) site, the situation since then has deteriorated significantly. With a moderate amount of rainfall, we are experiencing overtopping of raw sewage onto an adjacent public footpath and an open green space in front of a new residential development, Westvale Park. We are informed that Thames Water has agreed that action needs to be taken to prevent the overtopping onto public land, however, at this time, their plans are lacking any detail as this will fall into their next capital programme starting in 2025.

We would request the EXA be aware and seek assurances from Thames Water that the HSTW will be able to accept the inevitable increase demands placed upon it, should the DCO application be granted but also the increase in demands from the local community including future planned developments.

Air Quality:

The Town Council notes the comments made in the Air Quality chapter (para 13.2.5) in relation to ultrafine particles. As we have pointed out to the applicant in its PEIR response, we understand that aircraft is a key source of ultra-fine particles and understand that there are currently areas of Horley near the airport that have ultra-fine particulate levels in the air comparable to that seen kerbside in central London. We note the applicant's point about the lack of a legislated standard but understand from presentations by Reigate & Banstead Borough Council to the GATCOM steering group (June 2022) that the WHO have published guidelines on the levels at which ultrafine particle exposure can be considered 'low' or 'high' and that the number of hours 'high' in Horley is greater than that at the kerb of a major road in London.

The Town Council also understands from the borough council that PM_{2.5} is **not** a good indicator of general risk associated with exposure to ultrafine particles from aircraft emissions, and so it is unclear how the applicant has given consideration to the impact of ultrafine particles on local residents on the Horley Gardens Estate and the wider area as a result of the planned development.

Conclusions:

Whilst Horley Town Council supports the build back of Gatwick Airport and the economic benefits associated with this as we previously mentioned, we have spent considerable time and effort in reviewing the lengthy documentation in order to raise our concerns and provide constructive feedback at this stage of the Examination. As such, we hope that our additional response will be given due consideration and we look forward to hearing further on the outcomes of the Examination in due course.

Horley Town Council

8 March 2024

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