

Dear Council

We are writing to you, as the Host or a Neighbouring Authority, in relation to Gatwick Airport's recently closed consultation regarding its proposals to develop its northern runway so as to bring it into routine use and increase the capacity of the airport.

In our response to the consultation, we stated that, in our view, the consultation was not fit for purpose.

The principal reasons we gave for this were that:

- The air traffic projections in the consultation documentation give an erroneous and misleading impression of the need for the development and are not consistent with the Airports National Policy Statement. The ANPS requires airports, other than Heathrow, that are seeking to expand to demonstrate sufficient need for their proposals, additional to (or different from) the need which is met by the provision of a Northwest Runway at Heathrow. Gatwick's failure to provide an appropriate and policy compliant assessment of the need for the development means that respondents have not been able to evaluate its proposals adequately.
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- The economic analysis in the consultation contains material errors and omissions, as explained more fully in our detailed response. As a result, the consultation gives an erroneous and misleading impression of the benefits and costs of the proposed development.
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- The consultation overview document makes unsupportable claims about the employment benefits of the proposed development.
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- The consultation mischaracterises the noise impacts of the proposed development, makes unsupportable assertions on noise matters and does not provide sufficient information to allow respondents to evaluate noise impacts in specific areas.
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- Information required to enable consultees to submit properly informed proposals has not been provided.

In addition, in our view, Gatwick has not engaged with community groups or Councils in a positive and proactive manner. Questions posed in engagement meetings have not been answered promptly or at all and not all requested engagement meetings have been arranged. No opportunity for face-to-face meetings has been provided.

For these reasons, and others, in our view, the consultation is not "based on accurate information that gives consultees a clear view of what is proposed ..." as required by the Planning Act 2008 Guidance. It also does not provide sufficient information to allow informed responses and it does not permit the "intelligent consideration" required by the Gunning Principles for consultations. We therefore do not believe the consultation meets the requirements of the Planning Act and we consider that any application based on it should be rejected on the grounds of inadequate consultation.

We have specifically drawn Gatwick Airport's attention to the above matters but have had no response from it.

We note that a number of Councils have expressed similar concerns in their responses. For example:

- Crawley Borough Council's (CBC) response states: "There is a general lack of detail [in the consultation] and we believe that GAL still needs to undertake a significant volume of further technical work to justify many of the technical assumptions underpinning this Project. This includes fundamental issues such as major evidence

and information gaps in the need case for the NRP, particularly in light of national carbon reduction targets but also in relation to the basis for the passenger forecasts and underlying assumptions, and the justification for the level of associated development, including car parking".

- CBC also states: "CBC has made strenuous efforts to identify, consider, and, as far as possible, offer a clear insight into what the impacts of a proposal of this scale would be on its community. Our misgivings expressed in much of the response is that the period offered for consultation fails to recognise the practical issues of mobilising often constrained and limited technical resources within the Council. ... We must point out that the Promoter has an obligation to ensure that adequate consultation includes providing statutory consultees with sufficient time to engage across all technical areas of the Project. This is fundamentally important, given that the Planning Inspectorate will be advising the Secretary of State on whether consultation was adequate, which is a pre-requisite for the Inspectorate to have the confidence to recommend that the applicant carries the proposal forward into Examination."
- East Sussex County Council states: "Given the large number of complex and lengthy consultation documents it has been difficult to fully evaluate the PEIR within the time available" and "Insufficient information has been provided by GAL to enable the basis of its demand forecasts, and how these relate to the capacity that may be provided through the simultaneous use of the Northern Runway, to be properly understood in adequate detail for the local authorities to be able to comment on the impact of the proposals."
- Horsham Council states: " I am particularly concerned that your consultation has not been effective in highlighting your proposed changes to residents in Horsham District, with minimal presence in our District and a high volume of technical documentation with limited summaries. I am therefore very concerned that there will be many residents in the District who will be unaware of the potentially very significant changes increased growth of the airport may bring."
- Surrey County Council states: "We are disappointed at the lack of engagement we have had with GAL on the proposed project leading up to this consultation, especially the limited sharing of technical information, which is in contrast to our experience of working with other promoters of airport expansion schemes in recent years. This has reduced our ability to provide detailed feedback and influence the development of the project. Fundamentally, we need more information on key areas to enable us to understand and develop an informed view of the likely environmental and health effects on our communities as a result of construction and scheme delivery. Our response reflects this and sets out the areas where we have significant concerns and questions that need to be satisfactorily addressed".

We understand that, if an application is submitted, you will be asked to submit an adequacy of consultation (AOC) representation and that the Planning Inspectorate must have regard to any comments it receives from you in deciding whether or not to accept the application.

Our firm view is that Gatwick's consultation was inadequate and not fit for purpose. We do not believe it met the requirements of the Planning Act and we consider that any application based on it should be rejected on the grounds of inadequate consultation unless and until a further, full, consultation is carried out.

We intend to make these views known to the Planning Inspectorate. However, we would be grateful if you would reflect them fully in your AOC representation in due course.

Regards

Peter Barclay
Chair
Gatwick Area Conservation Committee