



Horsham
District
Council



Gatwick Airport Northern Runway Project Development Consent Order

Planning Inspectorate's Reference: TR020005

Joint West Sussex Written Representation on Project Changes
Deadline 3: 19 April 2024

Crawley Borough Council (IP Ref: GATW-AFP107)

West Sussex County Council (IP Ref: 20044715)

Horsham District Council (IP Ref: 20044739)

Mid Sussex District Council (IP Ref: 20044737)

1 Introduction

- 1.1 This document is a joint Written Representation (WR) from the West Sussex Authorities comprising Crawley Borough Council (CBC), West Sussex County Council (WSCC), Horsham District Council (HDC) and Mid Sussex District Council (MSDC) hereafter referred to as “the Authorities” in response to the formal “Change Request” made by Gatwick Airport Limited (GAL) on 13th February 2024 in relation to the proposed Gatwick Airport Northern Runway Project (the Project). The ExA confirmed acceptance of the “Change Request” in its letter dated 8th March 2024 ([PD-011](#)) and this representation is submitted by Deadline 3 (19th April 2024) as specified in that letter.
- 1.2 The documents that have been considered as part of this response are set out in the table below:

PINS Doc No(s) Submitted on 13.02.24	Document Title Revision
AS-124	Covering Letter to ExA for Change Request
AS-125 and AS-126	1.3 Navigation Document (Clean and Tracked) Version 7
AS-127 and AS-128	Draft Development Consent Order (Clean and Tracked) Version 4
AS-129 and AS-130	4.5 Works Plans (Clean and Tracked) Version 3
AS-131 and AS-132	4.7 Parameter Plans (Clean and Tracked) Version 2
AS-133 and AS-134	5.1 ES Chapter 5 Project Description (Clean and Tracked) Version 3
AS-135 and AS-136	5.2 ES Project Description Figures (Clean and Tracked) Version 2
AS-137 and AS-138	8.7 Project Description Signposting Document (Clean and Tracked) Version 2
AS-139	9.2 Change Application Report
AS-140	9.2 Change Application Report Appendices A and B
AS-141	9.2 Change Application Report Appendices C and D
AS-142	9.3 Change Request Consultation Report Addendum
AS-143	9.3 Change Request Consultation Report Addendum Appendices
PINS Doc No(s) submitted on 12.03.24	
REP1-016 and REP1-017	5.1 ES Chapter 5 Project Description (Clean and Tracked) Version 4
PINS Doc No(s) Submitted on 26.3.24	Subsequent Updated Application Documents provided by GAL to specifically amended for the Change Request
REP2-001	Covering Letter to ExA – Deadline 2 Submission

REP2-006 REP2-007 REP2-008	5.2 Environmental Statement Landscape, Townscape and Visual Resources Figures Parts 1 to 3 Version 2
REP2-011 REP2-012	5.3 Environment Statement Appendix 5.2.3: Mitigation Route Map (Clean and Tracked) Version 2
REP2-013 REP2-014	5.3 Environmental Statement Appendix 5.3.1: Buildability Report Part A (Clean and Tracked) Version 2
REP2-016	5.3 Environmental Statement Appendix 5.3.3: Indicative Construction Sequencing (Clean) Version 2
REP2-019 REP2-020	5.3 Environmental Statement Appendix 7.8.2: Written Scheme of Investigation for post-consent Archaeological Investigations and Historic Building Recording - West Sussex (Clean and Tracked) Version 2
REP2-021 to REP2-028	5.3 Environmental Statement Appendix 8.8.1: Outline Landscape and Ecology Management Plan Parts 1 to 4 (Clean and Tracked) Version 2
REP2-029 REP2-030	5.3 Environmental Statement Appendix 9.9.2: Biodiversity Net Gain Statement (Clean and Tracked) Version 2
REP2-009 REP2-010	5.3 Environmental Statement Appendix 19.8.1: Public Rights of Way Management Strategy (Clean and Tracked) V2
REP2-032 to REP2-036	7.3 Design and Access Statement – Volumes 1 to 5 Version 2
REP2-037 REP2-038	7.3 Design and Access Statement Appendix 1 – Design Principles (Clean and Tracked) Version 2
REP2-002 and REP2-003	Navigation Document (clean and tracked versions) Doc Ref. 1.3 v9
PINS Doc No(s) Submitted on 06.2.24	Additional Document
PDLA-007	5.1 Environmental Statement Chapter 5 – Project Description Version 2 (Tracked)

1.3 This WR should be considered alongside the West Sussex Local Impact Report (WSLIR) [[REP1-068](#)] submitted at Deadline 1. Where subject issues are referenced in the commentary below, the relevant policies are not repeated in this documentation but referenced to the LIR with only new issues set out in full. The report sets out commentary in the following order:

- Adequacy of consultation
- Comment on each Project Change incorporating, where applicable, a description of the site and proposed development, any relevant constraints and additional policies where relevant
- Planning considerations in topic themes
- Conclusion

2 Adequacy of Consultation

2.1 The Authorities are disappointed to note that despite responding to the Applicant with detailed points during its consultation period in January 2024, little additional information has been supplied to address the matters raised. Therefore, the Authorities are expressing in their comments below many

concerns already raised with the Applicant. A copy of each Authorities' correspondence is attached as Appendix 1 at the end of this report.

- 2.2 While the Applicant did revise the Project description in Chapter 5 Version 2 of its Environmental Statement (ES) [[PDLA-007](#)] at procedural Deadline A on 6 February 2024, it is noted that at that time it included the additional reed bed works compound prior to the submission of its change request. It also amended the description of the existing CARE building to update the fact that the current biomass boiler is no longer operational and therefore addressing some gaps in its change consultation information. As a consequence, it is considered that the revised project description and project change submission to Chapter 5 Version 3 [[AS-134](#)] is somewhat misleading as some information for this change application had already been fed into the DCO documentation. The changes introduced are not apparent in the most recent tracked change document Chapter 5 Version 4 [[REP1-017](#)]. It would have been more helpful to the Authorities if all relevant change application information had been submitted on one revision document on one date rather than incrementally.

3 Project Change 1 - Increase to the design parameters for the North Terminal International Departure Lounge proposed southern extension

- 3.1 The land is located on the south western side of North Terminal, to the east of Pier 5, north of Pier 4 and in its south-east corner is immediately north of the link bridge serving Pier 6 (Works Area 22 b). The extent of the land shown within the Works and Parameter Plan is covered by a mixture of airfield infrastructure including Piers, Commercially Important Passenger (CIP) Lounge, Circulation Building, various link routes and corridors and hardstanding. The proposed project change is set out in section 3.1 in GAL's Change Application Report [[AS-139](#)].

Planning Considerations

- 3.2 In visual terms there are no concerns with increased height and massing of the building as this is set well within the DCO project boundary and away from sensitive receptors such as residential uses. There is concern that there is still very limited information provided on the layout and visual appearance of the works and the impact this would have on the North Terminal. The Design and Access Statement Appendix 1 – Design Principles document [[REP2-037](#)] provides little information or control on the design of the building and the lack of design detail for works in general has been highlighted by the Authorities in the WSLIR [[REP1-068](#)] Section 24 and includes this project change (listed at paragraph 24.73). The Authorities fully support the request made by the ExA ExQ1 GEN 1.19 [[PD-012](#)] for GAL to provide further design information on this extension.
- 3.3 It is noted that the footprint of the works area has increased and, as the site is within Floodplain, the Applicant should ensure that this does not impact upon any assumptions and calculations made within its drainage strategy.

4 Project Change 2 - Reduction in the height and change in the purpose of the replacement Central Area Recycling Enclosure (CARE) facility

- 4.1 This change (Works Area 9) proposes a decrease in the height of the building from 22m to 15m, the removal of 2 biomass boilers proposed within the building and the removal of the associated biomass boiler stack (with a maximum height of 48m) and changes to the phasing of the development of the CARE facility, now a single phase running from 2024-2029. All other parameters remain as described (footprint, maximum depth, and location) and further detail is set out in GAL’s Change Application report section 4.1 [[AS-139](#)].
- 4.2 This change is considered significant as the Applicant is removing from its Project the potential to generate decentralised energy and has failed to demonstrate its compliance with adopted policy in the Crawley Borough Local Plan 2015-2030.
- 4.3 Policy ENV7 encourages the promotion of decentralised energy networks to support new development within the Borough. The policy requires that:

"Any major development within the borough..... should demonstrate how they have considered the following hierarchy:

- (i) where a network is in place in the immediate area: connect to an existing District Energy Network; or*
- (ii) where a network is not yet in place, development should:*
 - (a) consider developing its own system for supplying energy to any surrounding existing or planned buildings. Any system installed should be compatible with a wider district energy network and developments should ensure that connection to a wider network is facilitated in the future through good design and site layout; or*
 - (b) consider how it may include site-wide communal energy systems; or*
 - (c) be "network ready", optimally designed to connect to a District Energy Network on construction or at some point after construction.*

An alternative approach to securing decentralised low carbon energy may be justified, on a case-by-case basis, where developments demonstrate that the objectives of Policy ENV7 cannot be achieved in line with the criteria above, due to technical or financial viability, or due to site or development specifics.

All development subject to the requirements of Policy ENV7 must be supported through the submission of a Sustainability Statement in compliance with the Planning and Climate Change SPD."

- 4.4 Furthermore, the Modifications Crawley Borough Local Plan policy SDC2 states:

"The development of district energy networks and associated infrastructure is encouraged and should be approved unless it results in significant adverse impacts on the environs..... Any major development within the borough meeting the thresholds for submitting a Sustainability Statement detailed in Policy SDC1....., must incorporate an energy strategy developed in accordance with the following hierarchy:

i. where a network is in place in the immediate area: connect to an existing District Energy Network;

ii. where a network is not yet in place:

a) incorporate within the development a system for supplying energy to any surrounding existing or planned buildings. Any system installed should be layout; or

b) include site-wide communal energy systems; or

c) demonstrate that the development will be "network ready", i.e. optimally designed to connect to a District Energy Network on construction or at some point after construction.

iii. where a development has demonstrated that the preceding options cannot be achieved, due to technical feasibility, or due to site or development specifics, an alternative approach to incorporating low- or zero-carbon technology energy may be justified, on a case-by-case basis. These developments will be required to supply a proportion of their regulated energy needs from low- or zero-carbon sources located on or near the site as follows:

a) For major developments within a DEN priority area: at least 20%;

b) For major developments outside a DEN priority area,at least 10%.

Where a connection to an existing District Energy Network is proposed, the council may secure the implementation of this by means of a planning obligation. All development within the categories identified above must be supported through the submission of a Sustainability Statement in compliance with the Planning and Climate Change SPD".

- 4.5 The DCO as originally submitted was considered by the Authorities to address this policy as while the details provided were limited, the proposed biomass boilers were providing an element of decentralised energy for the Project. It is now unclear how GAL intends to address policy ENV7 or meet its sustainability goals with the biomass boilers removed from the CARE facility building. CBC raised this matter at consultation stage and notes that there is no reference to the policy in the Applicant's Project Change submission or any explanation as to how this change improves the sustainability of the airport. The Applicant is requested to explain how this addresses policy ENV7 and to supply further information to explain what is being done to mitigate for the loss of the biomass facility. It is noted that the Carbon Action Plan has not been amended and it is unclear how this change impacts upon the airport's sustainability targets.

Planning Considerations

The removal of the biomass boilers is a significant project change, which would result in a greater amount of waste requiring management off-site (para 4.2.2 of the Change Application Report 9.2 [[AS-139](#)]), with the proposed CARE facility only being used as a Material Recycling Facility (MRF) for the sorting of waste. There are some benefits to the changes:

- Visual impact and landscape views, as there would no longer be a 48m stack and the building height would be lower (Table 4 of the Change Application Report 9.2 [[AS-139](#)]);
- Potentially lower in Air Quality impacts from removal of boilers (Table 4 of the Change Application Report 9.2 [[AS-139](#)]); and
- The Applicant references health and well-being improvements as a result of these project changes; Effects on air quality would be similar or improved for public health compared to that predicted in the ES (Table 4 of the Change Application Report 9.2 [[AS-139](#)]).

4.6 The Authorities raised a number of concerns relating to the CARE facility building (as originally submitted) within the WSLIR [[REP1-068](#)] and many remain valid when considering the project changes:

- There is no baseline information provided on current operations (para 22.28 and 22.37, [REP1-068](#)), including:
 - No tonnages, information on waste streams etc per annum, how much is managed on-site/off-site;
 - Hours of operation of existing facility (and proposed);
 - Existing technologies; and
 - existing mitigation measures.
- There are no waste projections/forecasting (with and without the NRP) that would enable understanding the needs of the airport (paras 22.28 and 22.37, [REP1-068](#)).
- There is limited information provided on the proposed technologies and whether they are consistent with the waste hierarchy (para 22.29, [REP1-068](#)).
- Limited information is provided on design within the Design and Access Statement/Design Principles (paras 22.35-22.36, [REP1-068](#)).
- There are no links to local planning policy [para 22.34, [REP1-068](#)].

4.7 Following the acceptance of the changes, there are further issues of concern as follows:

- All waste would now require management off-site, which has implications on traffic and transport (see comments below);
- How will the Applicant ensure that waste is managed in line with the Waste Hierarchy, given that it would all be exported?
- How far would the HGVs have to travel to waste sites?

- What sorting technologies are proposed to be used?

Transport/Highways

- 4.8 The project change proposes the removal of the incineration of waste by changing the replacement CARE facility to become a waste sorting facility only. This would result in waste material being taken off-airport to a dedicated waste processing centre. The proposed change would result in waste material being taken off-airport, where previously it would be managed within the airport, this is going to result in an increase in vehicle movements associated with the CARE facility.
- 4.9 The Applicant has concluded that the project change would not materially result in an increase in construction or operational trips stating that the operational trips, are expected to be small, in the region of six vehicles trips a day. The Applicant, however, does not provide supporting information or an explanation, including tonnage information, to help justify why this number of vehicles a day are required. This additional information is required to fully understand the impact of the proposals and explain how the CARE facility is going to operate in practice.
- 4.10 The Applicant has explained that the waste vehicle movements occur on the strategic road network, where possible and appropriate, and that Project Change 2 would not materially change the existing routes used by waste management vehicles. However, the Authorities previously asked where the waste was likely to be taken when travelling off-site. The location of the waste management facilities has not been provided. This information would assist in understanding the most likely routes waste vehicles would take.

5 Project Change 3 - Revision to the Surface Water Treatment Works system

- 5.1 Project Change 3 proposes to change from the originally proposed surface water treatment works (a Moving Bed Biofilm Reactor plant solution) to a constructed wetland (reed bed) solution. The area required for the water treatment works would increase from up to 5,600m² to approximately 16,000m². Six reedbed areas are proposed to be created along with the accompanying plant comprising a blower kiosk enclosed by an acoustic fence, a cabin and storage unit and a site access with car park.
- 5.2 The Authorities note the key environmental constraints for this works site including that the land is managed as a Biodiversity Area (designated under policies ENV1 and ENV2 of the Crawley Borough Local Plan), the existence of trees protected by a Tree Preservation Order to the southwest and that the site is a known archaeological area (Iron Age Cremation Cemetery) which the Applicant has acknowledged would have a potential major adverse impact. It is also close to Public Rights of Way, is adjacent to Crawley Sewage Treatment Works to the north and there are residential properties (closest approximately 100m from the works boundary) and a traveller site to the south (approximately 55m from the works boundary).

- 5.3 The Applicant also refers to the requirement for a temporary (0.5 hectare) construction compound. The only diagrammatic reference to the temporary compound is on ES Figure 5.2.1f Rev 2 [AS-135] which shows its location to the west of the reedbeds, this conflicts with the written information in the ES Chapter 5 paragraph 5.3.113 [REP1-017] which suggests the compound is located to the north-east of the reedbeds. The Authorities request further information on the precise location of the compound and further information on its visual appearance including any groundworks and tree/landscape clearance, compound layout, means of access to the land, as well as detail on how the site would be operated.

Planning Considerations

Landscape and Visual Impacts

- 5.4 The Authorities are concerned about the lack of detail as the illustrative information [AS-139] suggest a fairly flat landscaped reedbed while the parameter plans [AS-131] show the works are up to 3m high and the permanent cabin and storage facilities for the reedbeds up to 4 m high. There is no information on current site levels, the amount of excavation and engineering needed to excavate the reedbeds and whether any soil would be retained and reused at the site or exported elsewhere. The final profile of the reedbeds and how they relate to the wider landscape setting (including any protected trees) is unclear, as is the depth of the lagoons and whether more fencing than is shown will be required to restrict access to the reedbeds. It is not clear whether the fencing shown is a realistic representation of what would be delivered. It is noted that the other nearby pollution control lagoons are fenced and netted to deter birds but the Applicant has not indicated the likely visual appearance and finish of the reed beds, the site car park, cabin storage and blowers.

Water Environment

- 5.5 A constructed wetland solution is a preferred method for water treatment compared to the originally proposed Moving Bed Biofilm Reactor Plant Solution, as it would provide additional biodiversity benefits and is likely to be more carbon efficient. However, the Authorities consider there is currently insufficient detail provided to demonstrate that there would be no impact on flood risk to the site or elsewhere. Evidence should be provided demonstrate that the reedbeds could draw 100 l/sec from the de-icer pollution storage lagoons.
- 5.6 The Authorities seek clarification on the following matters:
- Paragraph 5.1.2 in the Project Change document [AS-139] mentions that the proposed water treatment works will increase in footprint due to an additional area of land for the reed bed system and an additional temporary construction compound. Paragraph 5.1.9 [AS-139] also states that a cabin, secure storage unit and car parking area will be needed. It is unclear from the information submitted by the Applicant whether the addition of these structures will increase the impermeable area of the water treatment works and, if so, whether this been considered in the surface water drainage model and calculations for the proposed development site.

- Table 6 [[AS-139](#)] indicates that there will not be a flood risk interaction as the proposed works are located outside of the floodplain of the Gatwick Stream. The Authorities request clarification as to whether the proposed works are also located outside of an area at risk of surface water flooding.
- Further layout details should be provided for the proposed water treatment works, such as the locations of any structures (temporary or permanent) and proposed drainage arrangements including the outfall location.
- Further detail is required to understand if the Applicant has considered the use of a constructed reedbed wetland solution for water treatment elsewhere in the DCO Limits. The Authorities consider this would be beneficial in place of the new pumping station proposed in the southwest zone, south of the existing runway in the former Pond A catchment, to remove the need for a pumping station (see paragraph 10.46 and 10.47 in the WSLIR [[REP1-068](#)]).
- The Applicant is also requested to provide further information on water quality and measures to ensure that surrounding water courses are protected from the de-icer and pollution from the existing pollution storage lagoons which are proposed to be treated by the reedbeds.

Ecology

- 5.7 In principle, a reedbed is likely to be a more environmentally sustainable solution, which could deliver some ecological benefits provided that the right location can be found. However, the site lies within the "Land East of the Railway Line (LERL)" Biodiversity Area. This land is currently known to be of biodiversity interest and is managed by the Applicant to maintain and enhance its biodiversity value. The area falls within the DCO Limits and is included in the Phase 1 Habitat Survey [[APP-048](#), Fig. 9.6.3], where it is recorded as semi-improved neutral grassland. This habitat type is of value and of limited extent within the DCO Limits.
- 5.8 The Authorities are unable to assess the potential ecological impacts without further information. The schematic drawing showing blocks of reedbeds is of limited use and further information is needed to understand the construction of the reedbeds. Furthermore, there is no information on the drainage arrangements, including water supply to feed and maintain the reedbeds, and where the outflow would be discharged. It is presumed that the water quality would need to be regularly monitored at both the inflow and outflow to the reedbed filtration system however this detail is not provided by the Applicants.
- 5.9 The proposed location of the construction compound comprises semi-improved neutral grassland which also lies within the LERL Biodiversity Area. There is no information provided on habitat reinstatement. The Authorities would expect the area to be reinstated to species-rich grassland.
- 5.10 The Authorities seek detailed information on the current biodiversity value of the area, precisely what habitats and features would be lost, mitigation, compensation and enhancement, and measures for long-term management.

Transport/Highways

- 5.11 The Applicant has indicated in ES Project Description Figure 5.2.1f, Proposed Temporary Construction Compounds, that an additional Reed Bed Treatment System Compound is to be provided to cater for the construction of the reed bed. The Authorities previously asked for clarification as to the means of access to this compound. It is noted that the Applicant states the means of access will be provided if the project change is accepted by the ExA. The access appears to be from Radford Road but clarification from the Applicant is still required. Should access be taken from Radford Road the Authorities wish to fully understand the implications of the proposed change on construction routing. The Outline Construction Traffic Management Plan (OCTMP) [[APP-085](#)] states at paragraph 6.4.1 that, "*The usage of local roads will be restricted for construction vehicle access to minimise disruption to local communities and traffic.*" The OCTMP identifies Radford Road as a Restricted Use access, meaning that it would only be used where local suppliers need to use it, for emergency use or where construction is happening on the local road network. The project change appears to alter the status of Radford Road meaning that it could be used as a primary construction route to access the Reedbed Compound. Clarification is sought from the Applicant.
- 5.12 The Applicant states in the Change Application Report [[AS-139](#)], that the peak construction associated with the reeds bed would be over a three-month period. During the peak construction period, there would be approximately one to two HGV movements an hour. Although construction would take place earlier than assumed in the Application, the Applicant concludes that this level of vehicle trips would not change the effects identified in the ES chapter for the period of airfield construction. However, it is not clear from the information provided what the total additional construction vehicle numbers associated with this project change would be.
- 5.13 The Applicant states that "*there would be approximately one to two HGV movements an hour in the 3-month construction period for the reed bed construction*". It is not clear whether this is the total number of movements or the additional number of movements above that associated with the previously proposed moving bed biofilm reactor plant solution. It is also not clear if the one to two movements an hour is a one-way movement and that in actuality all HGV movements would make two-way movements (into and out of the site) and therefore the total number of movements would be doubled. The Applicant should provide detail of the total number of vehicle movements associated with the reedbed solution and the likely difference in vehicle movements associated with the reedbed solution, compared to that with the previously proposed moving bed bio-film reactor plant solution.

Air Quality

- 5.14 The Authorities note that the submitted air quality assessment for Project Change 3 [[AS-141](#)] relates only to Non-Road Mobile Machinery activity during the reedbed construction period. The Authorities remain concerned about odour emissions from the reedbeds as the Applicant states in paragraph 5.1.11 [[AS-139](#)] that blowers are required to be operated particularly in the winter months to ensure the de-icers are so degraded that there would be no odour.

The Authorities have previously requested further information on the proposed reedbed technology and potential odour nuisance to nearby residents and users of the adjoining public footpaths. Further detail is required on odour and gas emissions from the reedbeds. The Authorities also request that the Applicant provides information on how it proposes to ensure the blowers are effectively maintained to ensure odour levels are controlled.

- 5.15 Further detailed information should also be provided on dust management for the works.

Noise

- 5.16 The Authorities note that very limited acoustic information has been provided on construction noise and vibration impacts. The report is considered to be of limited value as there are no maps or plans to accompany Appendix D showing precisely where the noise measurements have been taken from or where the proposed 2.4 high metre acoustic barrier would be positioned or what it would be constructed of. CBC property mapping does not show a Hoots Cottage or Hoots Lane in Radford Road and, therefore, is unclear where these measurements are taken from. Further detail is required to verify the information.
- 5.17 The Applicant's conclusions on noise are based on the assumption that works would take place during daytime hours. The restriction of construction operation hours for this sensitive area are supported but it is unclear to the Authorities how the Applicant intends to incorporate such a control into the DCO.
- 5.18 The information on the noise blowers is also very limited, along with any acoustic hoods and enclosures. Without seeing detail of the equipment, the Authorities cannot verify the assumptions within the acoustic report and are not satisfied that there are no adverse noise impacts from the development on nearby occupiers. The Applicant should also provide additional information on the maintenance of the blowers in order for the Authorities to be satisfied that these can be operated within the specified acoustic levels and remain in good working order to mitigate odour.

Cumulative Impacts

- 5.19 Crawley Sewage Treatment works are located to the north of this works site and has its access to Radford Road along the eastern side of the site. The proposed works would potentially reduce the ability to expand the capacity of the treatment works to meet increasing demand, including from the growth of the airport, planned growth with Crawley such as Gatwick Green and strategic housing sites on its boundaries including West of Ifield. Further information is referenced in paragraph 22.39 in the WSLIR [[REP1-068](#)].

6 Conclusion

- 6.1 The Authorities require additional information to be provided on all of Project Changes as detailed above.
- 6.2 Concerns remain about the potential negative environmental impacts of Project Change 2 in respect of compliance with local planning policies, the lack of

baseline information on the existing operations, the lack of detail for the proposed building (including waste management practices and proposed technology), the sustainability of the facility and future traffic movements once operational.

- 6.3 The Authorities raise concerns about the potential negative environmental impacts of Project Change 3 due to the overall lack of detail about the reedbeds, their construction and the technology being proposed to manage the de-icer pollution in this environmentally sensitive location. There is also uncertainty about the environmental mitigation proposed in particular for the loss of semi-improved grassland habitat.
- 6.4 There is a general lack of detail on construction of the reedbeds including removal of soil, drainage arrangements, engineering details and vehicle movements along with the measures proposed to protect nearby residents from noise and dust from the works. Clarity is needed on the siting of the temporary site construction compound along with full details of its layout, appearance and level of use and hours of working.
- 6.5 Once operational, there are concerns about the management of the reedbeds both in terms of drainage, water quality odour and noise. It is uncertain what measures and mitigation the Applicants are proposing to implement to ensure the safe environmental standards are maintained.
- 6.6 The Authorities consider that further evidence must be prepared by the Applicant to address these concerns, without which the full impacts of the Project Changes 2 and 3 cannot be adequately understood and without which the mitigation proposed by the Applicant cannot be assessed and any necessary Requirements or controls in respect of these changes be imposed.

APPENDIX 1

Previous consultation responses sent to the Applicant in relation to the proposed Project Changes

ECONOMY AND PLANNING SERVICES



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Direct Line: (01293) 438577

Our Ref: TR020005 – Book 9 v9.1
Email: development.control@crawley.gov.uk
Date: 19 January 2024

Mr Jonathan Deegan – NRP Programme Lead
Gatwick Airport Limited – Northern Runway Project Team
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Via email only to: Jonathan.Deegan@gatwickairport.com
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Dear Mr Deegan

CBC consultation response to Gatwick Airport Consultation on Proposed Project Changes to the Gatwick Airport Northern Runway DCO

I write with reference to the above consultation following a meeting on 5th December when GAL provided a presentation of the proposed changes it aims to request as 'Change Application' to the ExA following consultation.

The following documents have been reviewed by CBC (from GALs website) and form part of this response. It is noted that some of the consultation material listed has not been made available on the website for the entire duration of the consultation period :

- Consultation Leaflet titled 'Northern Runway project' – 2 pages
- Book 9 v1 (Ref 9.1) November 2023 – Notification of Proposed Project Changes
- Powerpoint Slide Deck dated December 23 (10 pages) – Northern Runway Programme – Summary of proposed changes to the submitted NRP DCO

Adequacy of consultation

The consultation approach is noted in section 5.2 of Book 9 however, as previously referenced in the Adequacy of Consultation prepared jointly by the local authorities (PINS reference **TR020005 AoC-020**), CBC again question the extent to which GAL has complied with certain parts of the Gunning or Sedley principles governing lawful consultation. Those principles are that:

- (i) proposals are still at a formative stage
- (ii) there is sufficient information to give 'intelligent consideration'
- (iii) there is adequate time for consideration and response and
- (iv) 'conscientious consideration' must be given to the consultation responses before a decision is made.

In this case it is considered that there is insufficient information to give 'intelligent consideration' to the proposals as the information provided has generated more questions than answers due to absence of



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tangible information. This missing information includes a the lack of evidence giving the rationale for the changes, lack of evidence of any impacts or concerns that the changes are supposed to address, lack of analysis and detail on the new impacts arising from the revisions and the fact the proposals give rise to some new impacts which appear not to be noted or evidenced.

It is noted that justification for the changes (para 1.1.2) is a refinement of the project proposals *“including having regard to feedback received from stakeholders”* however, there is no information in the submission to explain which stakeholders’ comments these changes seek to address or indeed any evidence that those stakeholders have been consulted on these changes.

With regard to the specific project changes, these have been summarised below (wording lifted from the consultation leaflet *and quoted in italics*). CBC commentary then follows underneath.

Project Change 1 – Increase to the design parameters for the North Terminal International Departure Lounge proposed southern extension

Existing application - *The application proposes two extensions to the North Terminal International Departure Lounge – to the north and south – to accommodate a mix of retail, catering and general circulation space.*

Project Change 1 *proposes to increase the design parameters of the proposed southern extension, together with the demolition of a passenger lounge and circulation building, to seek greater design flexibility for the future design stage. This will enable us to respond to future needs of retail and catering operators and provide an enhanced service to passengers. No increase in the net floor space to be created is proposed.*

There are no particular concerns with the increase in the parameter plan building height by 2.5m. The need for flexibility is understood subject to the floor area remaining unchanged. Further detail should be provided on how this alteration could impact upon the layout and visual appearance of the terminal.

Project Change 2 – Reduction in the height and change in the purpose of the replacement CARE facility

Existing application - *The application proposes to demolish and replace the existing Central Area Recycling Enclosure (CARE) facility which comprises a food waste to energy (heat) plant. In line with London Gatwick’s ongoing drive to sustainability, we have considered options to remove the incineration of waste on site.*

Project Change 2 *proposes to amend the replacement CARE facility to become a waste sorting facility only. Instead, waste material would be taken off-airport to dedicated waste processing centre(s) rather than being processed on site. Project Change 2 also comprises the removal of two biomass boilers and an associated flue of up to 48 metres, currently proposed under the DCO Application.*

It is noted that the current airport has a facility to incinerate waste on site and the DCO submission also proposed a replacement CARE building which would facilitate this provision.

While the removal of the biomass boilers from the CARE facility would have a positive visual impact (the removal of the flue/reduction in the overall building height by 8 metres) and positive impact in respect of odour / local air quality, other impacts and questions arise from the proposed change.

The impact of the change on the airport sustainability strategy is unclear. It is understood that the current plant creates heat (from food waste for energy) which is then recycled. How does GAL intend to meet the airport’s sustainability goals if the biomass boilers are removed? Furthermore, how does GAL propose to ensure compliance with adopted local plan policy ENV7 (District Energy Networks)?

Where does this waste go for incineration? The submitted documents are silent on the traffic impacts on the strategic and local road network and local air quality. Whilst we understand GAL has verbally provided a figure to GATCOM of an increase in HGV movements to 15 per week by 2049 travelling 46

miles away via the strategic road network, there is no written information to enable us to verify this. This information is also not available to others to enable meaningful response to this change proposal.

Project Change 3 – Revision to the Water Treatment Works system

Existing application - *The application proposes to treat stormwater run-off that contains de-icer through a Moving Bed Biofilm Reactor process.*

Project Change 3 *proposes to change this system to a constructed wetland (reed bed) solution, as a more sustainable solution for water treatment in line with our sustainability aspirations. Six reed bed areas are proposed, comprising a mix of wetland vegetation species to create a variety of habitat types.*

While at first glance this proposal sounds like a more environmentally sustainable solution that could deliver some ecological benefits, there are a number of site specific concerns.

There is very little detail provided about the reedbeds and how they would be constructed including the depth of the excavations and the impact on existing ground levels. The site is a known archaeological area (Iron Age Cremation Cemetery) and the previous proposal in the ES had been identified as a potential major adverse impact on this heritage asset and covered a much smaller area.

There is also no detail on the construction and drainage for these areas with no information on the depth of excavations for the reedbeds or how these would be connected to wider drainage infrastructure. Would the ground levels be raised or lowered?. How would this impact on the wider drainage strategy and comply with the SUDs principles? There is a culvert with crosses the site and it is unclear if this is impacted or if the reedbeds impact upon the nearby flood plain.

The water within the reedbed would be contaminated. There is no information on the risks in respect of pollution to nearby watercourses or to the wider environment. It is unclear if there would be risk to human health from the reedbed water or odour. There is no information on the reedbed technology, its effectiveness or the controls required to manage the reedbed including potential odour nuisance or noise from the 'blowers' used to aerate the reedbeds. How is water quality controlled?

The site is understood to be currently managed as a Bioversity Area (identified under adopted local plan policies ENV1 and ENV2) with the semi-improved grassland habitat being a scarce ecological resource within the DCO project boundary. There are TPO protected trees to the south and southwest. The proposal is unclear on the extent of tree and habitat loss and its impact on biodiversity. Also omitted is any detail on where any migration, compensation or enhancement could be provided. The ecological impacts are therefore of significant concern. It is uncertain how much biodiversity the new habitat could provide given the contaminated condition of the water and the fact that the nearby lagoons are netted over to deter birds and reduce birdstrike. It is also unclear if this new habitat would be supported from an aerodrome safeguarding perspective.

There is no information on the visual impact of the associated reedbed equipment or where this would be located. Similarly, there is no information on the location and appearance of the construction compound. There is also no information on any materials or soil to be removed from the site and where this would be taken.


There are concerns about the impact on nearby occupiers. The edge of the reedbed would be around 55m north of a traveller caravan site and 100m north of the nearest residential property. It is unclear if the amenities of these occupiers would be harmed from noise (from the blowers) or odour from the reedbeds. Operation and maintenance controls to manage impacts on nearby residents should be considered.

Crawley Sewage Treatment works is to the north of this site and shares an access past the reedbed site. The use of this land to the south would potentially reduce the ability to expand the capacity of the treatment works to meet increasing demand, including from the growth of the airport, planned growth

within Crawley and strategic housing sites on its boundaries. CBC would like assurance that Thames Water have been consulted on this project change and that this does not impact on long term operational needs for this key piece of infrastructure.

In summary, CBC find it unable to conclude that the project changes would minimise the impacts of the environment as is being suggested without further detailed information in order to establish that there would not be any new or materially different significant effects from the combined or proposed changes beyond those currently reported in the Environmental Statement.

Yours faithfully

Handwritten signature of Clem Smith, consisting of a stylized 'C' followed by 'Smith'.

Mr Clem Smith
Head of Economy and Planning

Cc: Lydia.Grainger@gatwickairport.com
George Harrold :- GatwickAirport@planninginspectorate.gov.uk

Northern Runway Project Team
Destinations Place
South Terminal Gatwick Airport
West Sussex
RH6 0NP

Friday 19 January 2024

Dear Sir/Madam,

Re: Horsham District Council Consultation Response to Proposed Project Changes to Gatwick Airport Northern Runway Project DCO

Thank you for inviting Horsham District Council (“the Council”) to respond to the consultation by Gatwick Airport Limited (“the Applicant”) on Proposed Project Changes relating to the Northern Runway Project Development Consent Order.

In preparing this response the Council has noted that the consultation is taking place before the proposed changes are submitted to the Planning Inspectorate for formal consideration by the Examining Authority, in line with the procedure set out in Advice Note Sixteen¹.

The changes have been considered as three proposals:

1. Changes to the design parameters for the proposed southern extension to give greater flexibility for the future design stage with no increase in the net floor space.
2. Reduction in the height, and change to the function of, the replacement CARE facility, removing the onsite incineration function, instead moving waste material off site. This change would also remove the 2 biomass boilers and the 48-metre flue.
3. Changes to the Water Treatment Works system, introducing six reed bed areas as a sustainable means of treating stormwater runoff containing deicer.

The Council is supportive of the Applicant’s intention to review and refine the proposal in light of the need for sustainability and environmental protections and the feedback of stakeholders. The proposed changes do, however, raise a number of questions and concerns relating to, but not limited to:

- a. The possible highways impacts of the changes proposed to the CARE facility, given the need to move waste off site for processing. The Council would like to see a separate assessment of the impacts of this change.
- b. Air quality issues arising from the use of HGVs to transport waste from the CARE facility to sites within or in proximity to Horsham District.
- c. Changes in the sustainability credentials of the airport given the loss of the CARE facility. No information has been provided on alternative on site energy provision to make up for the loss of energy from waste, which is concerning given the applicant’s own assessment that a larger facility would be required to provide for growth at the airport²

¹ <https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/advice-note-16/#Key%20steps%20in%20requesting%20a%20potential%20material%20change%20to%20an%20application>

² ES Chapter 5: Project Description (paragraph 5.2.51)

- d. In-combination impacts undermining the Applicant's conclusion that there would be no change, or an improvement to, Air Quality and Health and Wellbeing assessment outputs off-site.
- e. The ecological benefit of the Reed Bed solution, particularly if these are likely to be netted to mitigate any bird strike risk.

The Council is disappointed at the relative lack of information available at this stage to allow it to draw any meaningful conclusions about the proposed changes. AN16 Para 2.3 states that "*in the interest of fairness, it will normally be necessary for applicants to consult on a proposed change to an application.*" Para 3.4 then explains that the Applicant may consult voluntarily "*in advance of seeking procedural advice from the ExA in order to potentially save time*".

There is a long-established principle that a consultation, if embarked on, must be carried out properly. The Gunning or Sedley principles, established by Stephen Sedley QC in the case *R v London Borough of Brent ex parte Gunning*³ must all be met for a consultation to be considered legitimate:

- (i) proposals are still at a formative stage,
- (ii) there is sufficient information to give "intelligent consideration",
- (iii) there is adequate time for consideration and response, and
- (iv) "conscientious consideration" must be given to the consultation responses before a decision is made.

The principles were reinforced by the Court of Appeal in *R v North and East Devon Health Authority ex parte Coughlan*⁴ (where it was confirmed they apply to all consultations) and by the Supreme Court in *R ex parte Moseley v LB Haringey*⁵, which endorsed the principles' legal standing.

The Council's view is that the Applicant has failed to satisfy the Gunning principles meaning the consultation is inadequate. Moreover, the Council does not agree that the period and procedure of consultation was sufficient, given the addition of new information by the Applicant on Saturday 23 December 2023 just in advance of the Christmas and New Year period, when few potential respondents were likely to have been aware of this change.

We reserve the right to object to the proposed changes, in full or in part, in the future should these be taken forward and a formal Change Application submitted.

In keeping with the principle of openness, the Council has included the Planning Inspectorate on the circulation of this consultation response.

Should you have any questions regarding this response please contact, in the first instance, Julia Hayes, Senior Planning Officer, Strategic Planning (julia.hayes@horsham.gov.uk).

Your sincerely,



Catherine Howe
Head of Strategic Planning

³ (1985) 84 LGR 168

⁴ [1999] EWCA Civ 1871

⁵ [2014] UKSC 56

Contact:

Sally Blomfield
sally.blomfield@midsussex.gov.uk

Date: 18th January 2024

Via email to

feedback@gatwickfutureplans.com

Jonathan.Deegan@gatwickairport.com

Dear Mr Deegan,

**Gatwick Airport Northern Runway Project
Response from Mid Sussex District Council to Proposed Project Changes**

Mid Sussex District Council welcomes the opportunity to comment on Gatwick Airport Limited (GAL) proposed changes to the Northern Runway Project application. Although, the Council was not notified of the consultation, it is noted that GAL are seeking comments from stakeholders and other interested parties on the proposed changes before they are submitted to the Planning Inspectorate.

The following documents have been reviewed by Mid Sussex District Council and form part of this response. However, it is noted that some of the consultation material has not been made available on the website for the entire duration of the consultation period:

- Consultation Leaflet titled 'Northern Runway project' – 2 pages
- Book 9 v1 (Ref 9.1) November 2023 – Notification of Proposed Project Changes
- Powerpoint Slide Deck dated December 23 (10 pages) – Northern Runway Programme – Summary of proposed changes to the submitted NRP DCO

Adequacy of consultation

As previously referenced in the Adequacy of Consultation response prepared jointly by the local authorities (PINS reference **TR020005 AoC- 020**), Mid Sussex District Council continue to question the extent to which GAL has complied with certain parts of the Gunning or Sedley principles governing lawful consultation.

Those principles are that:

- (i) proposals are still at a formative stage
- (ii) there is sufficient information to give 'intelligent consideration'
- (iii) there is adequate time for consideration and response and
- (iv) 'conscientious consideration' must be given to the consultation responses before a decision is made.

In this case it is considered that there is insufficient information to give 'intelligent consideration' to the proposals. There is a lack of evidence to support the rationale for the changes, lack of evidence of any

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impacts or concerns that the changes are proposing to address, lack of analysis and detail on the new impacts arising from the revisions and the fact the proposals give rise to some new impacts which appear not to be evidenced.

It is noted that justification for the changes (para 1.1.2) is a refinement of the project proposals “*including having regard to feedback received from stakeholders*” however, there is no information in the submission to explain which stakeholders’ comments these changes seek to address or indeed any evidence that those stakeholders have been consulted on the proposed changes.

Proposed Changes

Although the proposed changes are unlikely to have a direct impact on the residents of Mid Sussex, Mid Sussex District Council is aware that other local authorities, including the Host Authorities have concerns about the proposed changes. This Council agrees with their concerns and in particular we wish to raise the following.

Project change 1: Increase to the design parameters for the North Terminal Internal Departure Lounge proposed southern extension.

From the information available it appears this change will not increase the floorspace of the North Terminal but will increase the amount of space available for retail, catering and general circulation. From the information available it does not appear to increase passenger number but could generate additional employment but further clarification in this point would be welcomed.

Project change 2: Reduction in the height and change in the purpose of the replacement CARE (Central Area Recycling Enclosure)

The proposed change amends the CARE facility from a food waste to energy (heat) plant to a waste sorting facility. Instead, waste will be taken off site to be processed. There is no explanation as to why this change is considered necessary, or what the implications of this proposal will be on GALs aspirations for the sustainable management of waste. Whilst there may be on site improvements to air quality with the removal of biomass boilers and flues, the proposal will generate additional HGV’s movements and increased incineration at an off-site facility. There is no detailed explanation of how the impacts have been assessed and justified.

Project change 3: Revision to the proposed water treatment works

The proposed change to the Water Treatment Works System from a Moving Bed Biofilm Reactor process to a construction wetland (reed bed) solution raises a number of concerns. These include negative impacts on protected trees, biodiversity, pollution, and odour issues. There is also potential for negative impacts on local residents through disturbance during construction (noise and traffic) and operation (noise and odour).

The Council reserves the right to submit additional comments during the Examination if further information becomes available. The Council asks that these comments are taken into consideration prior to the submission of these proposed changes to the Planning Inspectorate.

Yours sincerely,



Sally Blomfield
Assistant Director Planning and Sustainable Economy

Gatwick Northern Runway Project DCO (TR020005)

Project Changes - Consultation Response

West Sussex County Council

January 2024



1 Introduction

- 1.1 It is acknowledged by West Sussex County Council (WSCC) that Gatwick Airport Ltd (GAL) is proposing project changes to the Development Consent Order (DCO) as submitted to the Planning Inspectorate (PINS) and accepted for Examination on 3 August 2023. GAL is holding a period of consultation on these project changes from 13 December 2023 to 21 January 2024, before submitting a formal request to amend its DCO application in February 2024. It will be for PINS to decide if the changes can be made to the DCO application and included as part of the Examination process.
- 1.2 According to GAL, the proposed changes are being made to reduce the project's environmental impact and to provide additional design flexibility. The changes are:
 - Project Change 1 - Increase to the design parameters for the North Terminal International Departure Lounge proposed southern extension;
 - Project Change 2 - Reduction in the height and change in the purpose of the replacement Central Area Recycling Enclosure (CARE) facility; and
 - Project Change 3 - Revision to the Surface Water Treatment Works system.
- 1.3 The material provided to support the consultation consisted of:
 - A consultation leaflet;
 - A notification of proposed project changes report (Book 9, Application Reference 9.1); and
 - A slide pack (presentation given to local and parish council officers).
- 1.4 The approach to consultation is noted in section 5.2 of the Notification of Proposed Project Changes Report. However, as previously referenced in the Adequacy of Consultation prepared jointly by the local authorities (PINS reference TR020005 AoC- 020), WSCC would again question the extent to which GAL has complied with certain parts of the Gunning or Sedley principles governing lawful consultation. Those principles are that:
 - Proposals are still at a formative stage;
 - There is sufficient information to give 'intelligent consideration';
 - There is adequate time for consideration and response; and
 - 'Conscientious consideration' must be given to the consultation responses before a decision is made.
- 1.5 In this case, it is considered that insufficient information has been provided by GAL to allow consultees to give 'intelligent consideration' to the project changes because the consultation has generated more questions than answers. This is

due to the absence of evidence giving the rationale for the changes, the lack of evidence of any impacts or concerns that the changes are supposed to address, the lack of analysis and detail on the new impacts arising from the revisions, and the fact the project changes give rise to some new impacts that appear not to be noted or evidenced.

- 1.6 It is noted that justification for the changes is a refinement of the project proposals “*including having regard to feedback received from stakeholders*”. However, there is no information in the submission to explain which stakeholders comments these changes seek to address or indeed any evidence that those stakeholders have been consulted on these changes.

2 Project Change 1 - Increase to the design parameters for the North Terminal International Departure Lounge proposed southern extension WSCC Key Areas of Concern

- 2.1 WSCC has no concerns about Project Change 1.

3 Project Change 2 - Reduction in the height and change in the purpose of the replacement Central Area Recycling Enclosure (CARE) facility

- 3.1 WSCC raises concerns about Project Change 2 with regard to: Waste Management; and Transport/Highways.

Waste Management

- 3.2 GAL is proposing changes to the Waste/CARE facility proposals. These are:

- Decrease maximum height parameter of mail building from 22m to 15m;
- Removal of 2 x biomass boilers, and associated 48m flue/stack; and
- Changes to the phasing of the development of the CARE facility, now a single phase running from 2024-2029.

- 3.3 All other parameters remain as described (footprint, maximum depth, and location).

- 3.4 The removal of the biomass boilers is a significant project change, which will result in a greater amount of waste requiring management off-site (para 2.2.5 of the notification project report 9.1), with the proposed CARE facility only being used for the sorting of waste. There will be benefits to the removal, particularly in terms of:

- Landscape views, given there will no longer be a 48m stack and the building will be lower (para 3.1.5 of the notification report 9.1);
- Reduction in Air Quality impacts from removal of boilers (same or lower) (para 3.1.6 of the notification report 9.1); and
- GAL reference health and well-being improvements, due to these project changes; however the level of effect is unchanged (para 3.1.7 of the notification report 9.1).

- 3.5 WSCC has previously submitted a number of comments on the proposals (as submitted) and a number of these are still valid when considering the proposed changes (issue tracker references in brackets):
- There is no baseline information provided on current operations (Ref.18.2, Ref.18.14), including:
 - No tonnages, information on waste streams etc per annum, how much is managed on-site/off-site (Ref.18.9);
 - Hours of operation of existing facility (and proposed) (Ref.18.11);
 - Existing technologies (Ref.18.12); and
 - existing mitigation measures (Ref.18.13).
 - There are no waste projections/forecasting (with and without the NRP) that would enable understanding the needs of the airport (Ref.18.3).
 - There is limited information provided on the proposed technologies and whether they are consistent with the waste hierarchy (Ref.18.4, Ref.18.15).
 - Limited information provided on design within the Design and Access Statement/Design Principles (Ref.18.5).
 - No links to local planning policy (Ref.18.6).
- 3.6 Therefore, further issues/comments on the proposed changes are as follows:
- All waste will now require management off-site, which will have implications on traffic and transport (see comments below).
 - Where does GAL intend to send the waste? Are contracts in place with waste operators?
 - How will GAL ensure that waste is managed in line with the Waste Hierarchy, given that it will all be exported?
 - How far will HGVs have to travel to waste sites?
 - What sorting technologies will be used?

Transport/Highways

- 3.7 The project change proposes the removal of the incineration of waste by changing the replacement CARE facility to become a waste sorting facility only. This would result in waste material being taken off-airport to a dedicated waste processing centre.
- 3.8 Given that the proposed change will result in waste material being taken off-airport, where previously it would be managed within the airport, this is going to result in an increase in vehicle movements associated with the CARE facility. WSCC, as Local Highway Authority, seeks clarification on the following matters:
- What is the forecast magnitude of change in vehicle movements associated with the proposed change to the CARE facility?
 - How will this be taken into account in the Transport Assessment?
 - What is the likely nature of vehicle movements associated with the operations of the CARE facility? Are they predominantly to be HGVs?

- Where is the waste likely to be taken when travelling off-site and what routes is it likely to take?

3.9 The likely construction sequence of the CARE facility would change as a result of the project change. It was originally assumed that the facility would be constructed in two phases, the first being between 2024 and 2025 and a second phase between 2028 and 2029. As a result of the project change, the construction sequence would change to one continuous construction phase from 2024 to 2029. Does this change to the construction sequencing significantly alter the overall number of construction vehicles needed and does it change when the likely busiest period of construction traffic will occur?

4 Project Change 3 - Revision to the Surface Water Treatment Works system

4.1 WSCC raises concerns about Project Change 3 with regard to: Ecology; and Transport/Highways

Ecology

4.2 In principle, a reedbed is likely to be a more environmentally sustainable solution, which could deliver some ecological benefits. Therefore, there is no objection to the principle of the change provided that the right location can be found.

4.3 However, the site lies within the Land East of the Railway Line (LERL) Biodiversity Area. Therefore, this land is currently known to be of biodiversity interest and is managed by GAL to maintain and enhance its biodiversity value. The area falls within the DCO Red Line Boundary and is included in the Phase 1 Habitat Survey (E.S. Fig. 9.6.3), where it is recorded as semi-improved neutral grassland. This habitat type is of value and of limited extent within the DCO Limits.

4.4 It is difficult to assess potential impacts without further information. The schematic drawing showing blocks of reedbeds is of limited use and does not show the proposed location of the 0.5ha temporary construction compound. Furthermore, there is no information on the drainage arrangements, including water supply to feed and maintain the reedbeds, and where the outflow would be discharged. Presumably water quality would need to be regularly monitored at both the inflow and outflow to the reedbed filtration system.

4.5 WSCC seeks detailed information on the current biodiversity value of the area, precisely what habitats and features would be lost, mitigation, compensation and enhancement, and measures for long-term management.

Transport/Highways

4.6 Project Change 3 proposes to change from the originally proposed surface water treatment works (a Moving Bed Biofilm Reactor plant solution) to a constructed wetland (reed bed) solution. The area required for the water treatment works would increase from up to 5,600m² to approximately 16,000m². GAL states that an additional temporary construction compound (of up to 5,000m² in size) will be required for the delivery of the reed bed system.

- 4.7 WSCC, as Local Highway Authority, seeks clarification on the following matters:
- Where is the additional temporary construction compound to be located and how will it be accessed?
 - Paragraph 3.1.11, of the Notification of Proposed Project Changes document, states, “*There would be approximately one to two more HGV movements an hour in the 3-month construction period for the water treatment works compared to the construction HGV movements assessed in the DCO Application (being up to 220 movements)*”. For clarity, is the reference to 220 construction traffic movements the forecast construction vehicle movements assumed for the originally proposed water treatment works in the submitted DCO?
 - On the basis of a nine-hour day, two additional movements an hour in a three-month construction period for the reed bed solution would equate to 18 additional vehicle movements per day. When assuming an average number of days per month of 30.437, this would equate to an additional level of 548 vehicle movements per month and an additional 1,644 for the three-month period. Is this considered to be the likely forecast in construction vehicles as a result of the project change?
 - It is assumed that the “... *one to two more HV movements an hour...*” is a one-way movement and that in actuality, all HGV movements would make two-way movements (into and out of the site).
 - The construction sequencing for the reed bed is proposed to change as a result of this project change, that is, from 2025 to 2026 rather than from 2027 to 2028. Clarification should be provided as to whether the increased activity associated with the construction of the reed bed would take place when other construction activity associated with the NRP is at a higher level than it is forecast to be between 2027 to 2028.

5 Conclusion

- 5.1 GAL considers that none of the proposed project changes would result in a material change or that, either individually or collectively, they would result in a materially different project than originally applied for. Although it is acknowledged that the project changes reduce some concerns raised by WSCC through the pre-application process (including potential visual impacts of the CARE facility stack), the lack of detail presented in the consultation material leaves WSCC with outstanding concerns.
- 5.2 Further evidence must be prepared by GAL to address these concerns, as currently more questions have been raised than have been answered through this consultation.

Gatwick Airport Northern Runway Project (Project Reference: TR020005)
Project Changes – Consultation Response
West Sussex County Council
Submitted on 19 January 2024