From: [redacted]

Subject: RE: Gatwick Airport Northern Runway DCO

Attachments: Appendix A - Draft DCO review - June 23 - final version.pdf
Comments on Environmental Statement Chpt 5 - June 2023.pdf
Gatwick NRP DCO Draft Project Description comments June 2023 - WSCC COMMENTS - APP C.pdf

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Dear Jonathan

I resend the attached documents as pdf. Documents – apologies for my oversight in sending.

James Freeman

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From: James Freeman
Sent: Thursday, June 22, 2023 3:14 PM
To: Jonathan Deegan <[redacted]@gatwickairport.com>; Lydia Grainger [redacted]@gatwickairport.com>
Cc: [redacted]
Subject: Gatwick Airport Northern Runway DCO

Dear Jonathan

GATWICK AIRPORT NORTHERN RUNWAY DCO

I refer to GAL's release of draft DCO documents on 28 April 2023.

Although no agreement has been made between GAL and the GOG authorities regarding the provision of feedback on these documents ahead of the DCO submission, we wish to set out some initial high-level views on the documentation. This follows review by officers, technical consultants and legal advisors.

The GOG authorities have specific comments on the following:

- Draft Development Consent Order
- Draft DCO Explanatory Memorandum
- Draft Environmental Statement Chapter 5 – Project Description and associated figures
- Approach to Securing Mitigation

These initial views reflect both the provisional status of the documentation released by GAL to date and the lack of local authority access to what is anticipated to be a significant amount of technical assessment work undertaken by GAL to support the drafting of the documentation shared in April. Given the limited information available, it has not therefore been possible for the local authorities to undertake a comprehensive review at this stage.

Our feedback is set out in the form of three attachments. These have been prepared taking into account the Planning Inspectorate's Section 51 advice dated 3 May 2023.

- **Attachment A** sets out comments on the Draft – The Gatwick Airport (Northern Runway project) Development Consent Order (and accompanying PINS Version – Gatwick Airport NRP DCO Explanatory Memorandum – Draft December 2022).

- **Attachment B** sets out comments on the Draft Environmental Statement Chapter 5 – Project Description and associated figures.

- **Attachment C** sets out West Sussex County Council initial comments on the Draft Environmental Statement Chapter 5 - Project Description

Whilst the GOG Authorities are aware that GAL intend to submit the DCO application shortly, they have attempted to provide some commentary in advance of the submission and within the limited time scale available.

With regard to GAL's draft 'Gatwick NRP Approach to Mitigation', the GOG Authorities are of the view that there is currently insufficient technical information to allow the authorities to comment on its content in any meaningful manner. There are many references to Strategies, Codes, parameter approach etc. which the GOG Authorities have not had any sight of, nor has there been significant detailed discussions to date that would enable the authorities to comment in a fully informed way.

In general, accepting that they have not seen all of the documentation that will be submitted, the GOG Authorities believe that the mitigation anticipated to be offered by GAL is unlikely to provide the level and scope of mitigation to off-set the significant adverse environmental effects that arise from the development and the operation of the airport proposed through the northern runway project. The GOG Authorities also believe that the economic and social benefits offered are unlikely to outweigh the significant environmental adverse impacts that will arise, even with the mitigations in place.

There is concern that GAL wishes to take a "business as usual" approach to some aspects of the current Section 106 agreement which may not be sufficient to mitigate any potential adverse impacts, many of which would impact on the wider sub region. The GOG Authorities note that there are a number of funds GAL has identified within the topic areas that could form part of the new S106 Agreement. It is considered that much more detailed consideration and discussion in respect of how these obligations are to be funded and managed and the appropriate processes and mechanisms to access any funding as part of any S106 discussions will need to take place.

The Authorities have had regard to the Luton Rising DCO application and the proposed "Community First Fund" which could generate c.£13million for communities affected by the Luton Airport expansion proposals. Whilst the GOG Authorities appreciate that the Luton DCO application is at an early stage and the approach has not been properly tested at Examination, it is noted that a significant proportion of the Luton fund would be allocated to projects in the neighbouring areas and the authorities wish to see, from discussions going forward, a similar acknowledgement and ambition from GAL in respect of the impacts of the NRP on neighbouring authority areas. We do not consider that there is this acknowledgement as currently presented in the draft DCO, Explanatory Memorandum, Project Description and the Gatwick NRP Approach to Mitigation that GAL has shared.

Accordingly, the GOG Authorities do hope that GAL take an opportunity to review their approach and enter into discussions with the authorities to secure a higher quality DCO application and minimise areas of disagreement prior to submission.

Yours sincerely

James Freeman
Crawley Borough Council DCO Consultant
On behalf of the Gatwick Officers Group

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