

**Comments on Environmental Statement – Chapter 5: Project Description – Draft
March 2023 – issued to the LPA on 28 April 23**

It should be noted that this document has been quite difficult to assess in the absence of any of the supporting documents which are referenced in the supporting text (for example Appendix 5.2.1 referenced in para 5.2.5 or drawing 4.2.1a). Furthermore, it is difficult to assess what the extent of the proposed development is without a clear understanding of what exists on site at present and what the baseline would be. Without existing plans of the airfield (which have never been provided to the LPA) the descriptions in this chapter are difficult to follow.

The extent and complexity of the various development components are also impossible to ascertain without sight of the technical reports and site surveys that would be required to accompany them such as levels surveys, tree surveys and drainage and archaeological data etc.

It is still unclear having read this document what components are to be determined in detail as part of the DCO (with details provided for consideration by PINS) and what elements are to be conditioned. From description of the works which are still very short on detail, it would appear that some of the works such as the environmental mitigations, water management measures and the new road layouts must surely be considered and worked up in detail at this stage as without certainty on the delivery of these elements with the necessary environmental safeguards or mitigations, the wider project may not be able to take place in an acceptable manner. The level of detail and the approach to this project in terms of details for consideration by PINS and that expected to be left post DCO should be made clear to all parties.

It would appear that GAL want to provide a minimal amount of detail at this stage and rely heavily on a range of strategies to control and steer the development. It is of great concern that at this stage there has been no information provided on some strategies such as the rights of way strategy, lighting strategy, sustainability which GAL will be relying upon as part of its submission and even key documents such as the Design and Access Statement have only been shared once, primarily to discuss structure of the document rather than detailed content with the LPA as a single iteration and commented upon by the LPA. There has been only one subsequent update or revision to the Design and Access Statement document at a Planning A meeting – Nov 22) and provided some comments without response.

It is also noted that important parts of this document still appear to be incomplete and key issues have not been resolved including the capacity of the Thames Water Treatment Works (para 5.2.117), Biodiversity Net Gain (para 5.2.125, Construction Access (para 5.3.116), Traffic Management Strategy (para 5.3.119), Cut and Fill Strategy (para 5.3.120 and Sustainability during Construction (para 5.3.126).

Furthermore, there seems to be no detail on the sustainability targets for this development with no target set to improve potable water consumption despite GALs decade of change sustainability target and no indication or information on energy performance or sustainability measures for any of the buildings or other developments proposed as part of the works. The proposals also seem very limited on any mitigation other than the minimum amount required for the development with no obvious community benefit in either public realm, visual or environmental impact to nearby occupiers. This still appears to be a do minimum

development despite representations and suggestions put forward by this LPA to make other wider improvements which have the potential to value add to the scheme and provide benefits to the wider community.

The Authorities are also surprised that there is very limited reference to the Socio-economic aspects of the Project and believe that a chapter should be included in this regard. It is further considered that a chapter should also be included on Airspace Change.

Document specific comments

Para No	Comment
General	It would help the plans could be consolidated to be much clearer on the extent of the development rather than spread over various drawings. It would help if all airfield related works were on one drawing.
General	The descriptions of works are somewhat confusing as they appear in a variety of places. For example, car park X is a car park and drainage measure. It would be useful if some sort of summary table could be provided for each plot or area comprehensively explaining what is proposed. It would then be helpful to cross reference to a plan or drawing. If indicative information / sketch information is available this would assist
5.2.3 and 5.2.69	Page 2 confusing presentation of parking figures. For example, different figures quoted for number of spaces lost in different places, for example 5.2.69 versus table 5.2.3. and as a consequence, why there is no explanation as to why scale of highway works has not changed despite significant reduction in parking spaces
5.2.29 and 5.2.33	No identification of the positioning / siting of the stands are as no sight of existing plan.
5.2.1	Nos. of stands cannot be confirmed until existing plans provided and further information needed to verify this.
5.2.37, 5.2.39, 5.2.41, 5.2.42, 5.2.44, 5.2.48	It is not clear where these facilities current are located, although there does appear to be plan 5.2.1h it would be helpful if this could be cross referenced in the text of the document to aid understanding of the proposal.
5.2.43	Typo – I assume this building is marked in orange not green.
5.2.47	While there are no changes to the cargo facility it would be useful to understand how this capacity would be increased without any external changes to the building and by how much. It would be useful to understand on what basis this is assumed to be pd.
5.2.48	The yellow circled areas are not explained on 5.2.1 a
5.2.66	New office block (4,580sqm lettable floor area) – we assume this is to replace the lost floorspace at Destinations Place (as GAL has previously advised at TWGs) but the ES does not explain this.
5.2.68	The car parking provision and numbers are still not easy to follow in this document. While there is a parking plan it still does not clearly explain the car parks or where things are. Where is summer special? How will the new/reprovision reflect the provision of parking at a range of different price points? The ES refers to staff and passenger car parking interchangeably. It would be helpful if Table 5.2.3 could delineate between staff and passenger parking.

	The ES appears to be setting out that a net increase of +1,100 passenger spaces are proposed as part of the Project, with a further +6,570 spaces counted in the Baseline. In the absence of detailed supporting information it is unclear how the proposed parking increase relates to any increase in passenger numbers associated with the project, nor how the net increase in parking reflects GAL's sustainable transport mode share target obligations. More broadly, agreement between CBC and GAL as to what parking numbers (for example in relation to robotic parking) can be included within the Baseline is yet to be confirmed.
5.2.87, 5.2.94	Active travel measures are not clear. Where are these they are not shown on any plans?
5.2.103	It is difficult to understand the water management proposals from the information provided, again these are not clearly labelled on fig 5.2.1e
5.2.71	Car park X, there appears to be a contradiction on what is being proposed here stating this would be a surface car park but elsewhere stating it is decked. This is a case where a clearer explanation of what is going on at this site is needed.
5.2.125	The lack of detail around any BNG strategy is disappointing and there is a need to understand GAL's proposals in respect of BNG and GAL's detailed approach to complying with the mitigation hierarchy, particularly given the biodiversity crisis highlighted in the 25-year Environment Plan and the Environment Act 2021
5.1.126	Museum Field – another example where it is unclear what the works area and how this all works with drainage etc
5.2.117 & 5.3.49	<p>The ES sets out that if there is not sufficient capacity within the existing Crawley WwTW to meet demand arising from the Project, an expansion may be required. We understand that Crawley WwTW is already close to capacity and will require upgrades to accommodate planned growth outside of the DCO. On this basis, has GAL received feedback from Thames Water as to what upgrades may be required, and when these would need to be in place?</p> <p>5.3.49 sets out that 'the proposed water treatment works are anticipated to be constructed during 2027 to 2028'. It is unclear if this relates to the existing Crawley WwTW or is something separate proposed by GAL to accommodate needs arising from the Project.</p>
Figures	
Fig 5.2.1a	Unclear which extensions are which on the terminal buildings
Fig 5.2.d	Surface access changes are not well illustrated and misleading. Road proposals lack any detail. On airport routes shown are hard to understand and not well cross referenced to the text
5.3	Construction
5.3.1	This table is vague and appears to conflict with dates elsewhere in the document. It does not assist with understanding phasing requirements.
General	Further detail is needed to understand the sequencing, implementation and timing of this complex development and relationship between various elements.
General	There is limited explanation in the text on the timing of some these elements but little to assist the LPA understand how and when these components will be brought forward. For example, car par H has three

	elements of development, is a single submission envisaged or will this appear as one element? Similarly, the CARE facility is identified as a 2-phase project so are full details expected as a single submission or in stages?
General	There needs to be much more information on the overarching strategy for implementation of the project. Comfort needs to be provided on matters such as drainage so that on site construction does not result in increased flooding elsewhere. How is GAL proposing to deal with pre-commencement site wide constraints such as archaeology?
General	There is no information or acknowledgement of the loss of habitat especially trees during construction, the need for protection and for mitigation if needed in line with policy CH6
5.3.53	Further detail needed on Pentagon Field. It has been identified for landscaping and ecological planting, but this seems to be in conflict for soil excavations. There is no detail on site levels or impacts.
5.3.76	This new pumping station as described is adding more load to Crawley Sewerage Treatment Works. Has this been discussed with Thames Water? CBC are very concerned about capacity at the Treatment Works