

Introduction

1. These comments provide feedback regarding certain elements of the project description, we wish to raise at this stage. A full review, once we have all the required documentation will be undertaken and presented as part of the DCO process going forward, if accepted by PINs.

Chapter Reference	WSCC Comment
<p>CARE Facilities (5.2.35)</p>	<ul style="list-style-type: none"> • Waste baseline - how much waste is currently managed per annum? <ul style="list-style-type: none"> ○ what is the waste make up in terms of type (food, packaging, other) and volumes. ○ what is exported (residual waste) for further treatment, recycling or landfill? • Current CARE Facility - How is waste currently managed at the existing facility - processes, technology, heat capture and usage from boiler (water? heating?). <ul style="list-style-type: none"> ○ What % of demand for the airport can it supply (heat capture), assuming nothing is exported? • Waste Forecasts - with and without NRP - have any projections/forecasts been prepared? • How are GAL taking account of Planning Policy related to waste (West Sussex Waste Local Plan, National Planning Policy for Waste, Waste Management Plan for England, guidance, Waste Framework Directive (and waste planning regs), Waste Hierarchy) • Will the Waste Strategy cover the operational waste of the airport (airside and landside), as well as construction waste? • How with the proposed MRF work? <ul style="list-style-type: none"> ○ Will all non-food waste will go through it? ○ What technology is proposed (manual/automated)? ○ What are the expected targets and tonnages for the MRF in terms of recycling, landfill etc • How will the proposed boiler(s) work? <ul style="list-style-type: none"> ○ Can they process more than food waste to recover heat energy from other residual waste? ○ When will the 2nd boiler come online, and how will that work with the existing stack/boiler? ○ Could a single boiler be used? ○ Could energy be recovered as well? ○ How will, and how much heat will be captured by the new CARE facility?

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	<ul style="list-style-type: none"> • The Stack is proposed to be 'up to 50m' - how has its height/width been determined? This is a worst case for LVIA purposes, how has a minimum height been taken into considered for matters such as air quality? <ul style="list-style-type: none"> ○ what modelling has been undertaken? What pollutants modelled for any permit? Have HCI, dioxins etc been considered? ○ Have discussions or agreements taken place with the Environment Agency? ○ Have agreements been made with the CAA regarding having a 50m stack, in terms of safety, lighting etc? ○ Have stack finishes been considered as part of the viewpoints for landscape assessment purposes. ○ Any assessment of potential plumes and associated visual impact undertaken? • What consideration has been given to emissions to air (in particular from the stack), what pollutant emission limits will apply? • Have cumulative impacts been considered, including from the Permitted EFW at Brookhurst Wood? Have the emissions (NO²) contours from the Brookhurst Wood EFW been considered? • What consideration has been given to alternative waste management methods? For example, could the food waste be sent for composting? • What consideration has been given the potential impacts on the water environment from the storage of waste? • What consideration has been given to impacts upon human health, in particular from stack emissions (have UK Health Security Agency (UKHSA) and Environment Agency (EA) been involved)? <ul style="list-style-type: none"> ○ How would this feed into the wider assessments and in combination and cumulative effects? • Will the facility be subject to an Environmental Permit (and will this be an EA or Local Authority regulated permit)? • What consideration has been given to climate change for this particular facility – How would this feed into the wider assessments and in combination effects?

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	<ul style="list-style-type: none"> • Will the biomass element of the facility be considered a 'renewable energy' and 'low carbon' proposal (i.e. in terms of NPPF as a biogenic waste and replacing alternative conventional fuels)? • How will odour, noise, litter and vermin be controlled at the CARE facility and how will this be assessed? <ul style="list-style-type: none"> ○ Odour will be of particular interest given food waste involved. ○ How will received waste managed to minimise odour, would any building have negative pressure/odour suppression systems etc? ○ How will waste be stored/transported/contained (sheeted/containerised etc)? ○ Will the CARE facility have fixed operating hours?
Surface Access improvements	<p>The list of highway works set out in the Project Description are yet to be agreed and there are elements of outstanding information and justification which are required and have previously been detailed to GAL. These include, completing the Stage 1 RSA with designers response and agreeing actions and providing suitable justification for proposed speed limit changes, including those on the A23 London Road. GAL state that no further improvements are proposed to rail station platforms or concourses. However, no specific details are provided about train service improvements or rail network improvements elsewhere on the wider network; this is still to be agreed and it would be useful to see any comments from Network Rail on this matter.</p>
Figures	<p>ES Figure 5.2.1g Environmental mitigation and enhancement areas - The Gatwick Biodiversity Area is depicted in grey, a similar colour to the tarmac of roads, car parks and runways. An alternative colour would be preferable.</p>
Power strategy (5.2.119)	<p>Of particular importance is the exclusion of renewable energy generation initiatives and climate resilience. A major piece of the Council's work in delivery our climate change strategy will be around increasing awareness and knowledge around the impacts of climate change and beginning to prepare for those impacts to worsen over the next decades. WSCC would expect to see these elements factored into the design.</p>
West Sussex Fire and Rescue	<p>There are a number of comments from West Sussex Fire and Rescue regarding the design and potential effects upon emergency response times, some aspects are given below. A meeting to discuss these elements would be welcomed.</p>

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	<ul style="list-style-type: none"> • CARE facility – WSCC Fire and Rescue would require consultation on the Fire Prevention Plan, is this available as an outline document? • How has/will fire fighting detection and infrastructure been considered in the outline design? • 5.2.45 - Emergency response times - how has the effect upon emergency response times for vehicles been factored into the relocation of the Rendezvous Point North? • 5.2.51 – we would like to understand what this provision/facility would look like • 5.2.59 – has fire prevention infrastructure been considered in the outline design? Engagement with West Sussex Fire and Rescue would be required to ensure this has been factored in. • Notification through the construction phase will be required, especially in relation to decommissioning of sprinkler system for extension works to the terminal etc. This is a wider point for all construction elements, including highways works. • 5.2.62 – need to understand the changes to these areas and how emergency access provision has been taken into account. • Power strategy – will there be a battery storage included in the design, this is not mentioned?
DCO parameters	<p>The presentation of maximum/minimum range of parameters for each element of the infrastructure could be presented in tabular form to allow stakeholders to cross reference back to, when reading the rest of the ES. How will these parameters be presented and secured through the DCO? Will each topic chapter have a table of the important parameters included as part of the assessment? This would be a clear and transparent way of allowing stakeholders to see which realistic worst case parameters have been used.</p>
Appearance and Design	<p>Although it is appreciated WSCC have not seen the Design and Access Statement or the Assessment of Alternatives chapter, a clearer understanding of how design principles have driven the proposed development will be required, and how these will be secured through the detailed design Requirements.</p>
Construction phase	<ul style="list-style-type: none"> • The Airfield Satellite Contractor compound, Car Park Z compound, and Car Park Z compound are identified as areas that waste will be processed, and waste crushing activities take place. These activities give rise to noise and dust that would require varying levels of mitigation, including, but not limited to, hours of working, operations taking place in enclosed areas, dust suppression, stockpile heights. It would be expected that any crushing activities are including within the CoCP and Waste Strategy, and mitigation proposed.

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	<ul style="list-style-type: none"> • What justification is there for the use of those specific areas/compounds for crushing activities? What are the reasonable alternatives considered? • Main compounds – What are the reasonable alternatives considered, will the assessment of alternatives for the location of these compounds be presented? They are large compounds that will be there for a long period of time. • Stakeholder engagement plan – we have not seen the OCoCP, but would expect a detailed and comprehensive stakeholder management plan for the construction phase. • Sequencing – more clarity would be provided if a diagram to show the sequencing periods was included. This would enable stakeholders to understand how different areas of construction works would overlap with each other temporally.