

Gatwick Airport Northern Runway Project – Development Consent Order (DCO)

Preliminary Meeting Statement

Gatwick Area Conservation Campaign (GACC)

6th February 2024

Dear Examining Authority

Please find our submission for the Preliminary Meeting on the 27th February.

1. In summary, GACC's main areas of concerns with the proposed procedure for the examination are as follows:
 - ! Omission of key issues from first round of Issue Specific Hearings;
 - ! Failure by GAL to release Key Data Sets, Models and Assumptions before the Examination Period Commences;
 - ! Outstanding requests from earlier GAL-led consultations in 2021 and 2022 and missing supporting information;
 - ! Timing interaction between written representations and Issue Specific Hearings; and
 - ! Process to prioritise topics within ISH sessions.

Issue 1: Omission of key issues from first round of Issue Specific Hearings.

2. The first round of Issue Specific Hearings (ISHs) do not appear to have included all of the 10 principal issues (as set out in the Annex C1 Rule 6 Letter).
3. GACC are concerned that if these issues are not raised at this early stage, this could lead to delayed release of key information from GAL and limit the degree of examination of evidence in these areas.
4. GACC request that the Examining Authority (EA) clarify which of the initial ISH dates will cover each of the 10 principal issues. If it is intended that some principal issues will not be addressed in the initial round of ISHs GACC would be grateful if the EA could explain why this is the case, and when and how omitted issues will be addressed. Interested parties will wish to diarise their involvement in these areas as soon as possible.
- 5.
- 6.
7. Principal Issues that are not included in the first round of ISH agenda are:
 - ! *Air Quality*

- ! *Climate Change and Greenhouse Gas Emissions*
- ! *Flooding and Water Environment*
- ! *Ecology*
- ! *Historic Environment*
- ! Also, whilst Aviation Noise is covered (ISH 5) it would appear that wider issues related to Noise & Vibration appear to be omitted.

Issue 2. Failure by GAL to release Key Data Sets, Models and Assumptions before the Examination Period Commences.

8. In a number of areas GACC consider that insufficient information has been released by the applicant. We are concerned that this will hinder the effectiveness of the planned examination, and has removed the ability of those participating in the DCO examination to fully assess key issues before the start of the six month examination. Consequently key areas of concern currently risk being omitted from the initial round of written representations.
9. GACC are concerned that key data sets, including in the form of models together with underpinning assumptions, are made available for independent expert and public scrutiny. GACC note that a number of statutory bodies have stated that they cannot comment on the findings of models until they have been able to independently verify the models, together with input data sets and assumptions made.
10. GACC are concerned that unless key information that is currently withheld by GACC is released before this six-month period starts then proper examination of this (especially independent validation and verification of models) may not be possible within the timescale of the examination.
11. GACC are concerned that the current absence of crucial, and often highly complex, data sets and modelling will mean that questions following detailed scrutiny of such models may not emerge until the latter part of the sixth month period. It is not clear how the release of these models (in particular) is factored into the examination process and timetable, so it is assumed that this should precede the start of the six-month period.
12. GACC request that key information and data sets are released prior to the start of the examination. GACC wish to avoid the situation whereby GAL might not actually release highly relevant information until late in the six-month DCO process, which would constrain or even remove the opportunity for proper scrutiny and examination, let alone subsequent discussion of the implications drawn from this.
13. Our concerns regarding the lack of information shared to date include the following:
 - ! **Traffic and Highway Models and associated modelling assumptions.** National Highways (RR, p10) consider the application is not accompanied by sufficient modelling information to enable them or the Examining Authority to fully understand the impact of the scheme.
 - ! **Flood Models.** The Environment Agency note that they are unable to comment in detail until a

detailed review of the applicant's 'with scheme' model has been completed. This has not been shared publicly either.

- ! **Air Quality Model and assumptions.** This has neither been shared publicly nor an independent review carried out so its assumptions and limitations are untested.
- ! **Demand projections with a third Heathrow runway.** Without this how is the need case for the expansion justified?
- ! **Noise envelope.** Information underpinning the proposed noise envelope, and data required to develop alternative, more policy compliant, proposals, has not been released by GAL.
- ! **Jet Zero assumptions should be shared.** Without this the risk of non-delivery is unclear, for example the modelled pricing of Sustainable Aviation Fuel and the anticipated impact of SAF on overall fuel costs should be shared. The way in which this delivery of Jet Zero impacts passenger and freight demand should then be modelled for Gatwick and shared to allow the Needs Case to be properly assessed.

Issue 3. Outstanding requests from earlier GAL-led consultations in 2021 and 2022 and missing supporting information.

14. GACC are also concerned that many of the points raised by consultees in the GAL-led consultations in 2021 and 2022 remain unaddressed, including with regard to information sharing. It would seem appropriate, and fair, that the applicant to be required to provide sufficient information to support public assessment of their application at an early as possible stage.
15. Our concerns regarding the lack of response to previous requests for clarity from GAL include:
 - ! **The detailed Parking Strategy**
 - ! **The 2023 staff survey data**
 - ! **The Airport Surface Access Statement.** It is noted that an ASAS was published for the examination of Gatwick's second runway proposal by the government's Airports Commission in 2014/15 so it would seem reasonable for at least the same level of information to be shared with this application.
 - ! **The noise envelope development process.** If there's to be no further engagement, what will the process be? Are GACC and others expected to put forward our own worked-up proposals during the examination period? Or will the EA request more work or an additional process?
16. Similarly what will be the process for ensuring sufficient sharing of such core supporting material where GAL claim to have engaged and based its proposals on an engagement but in fact has failed to do so in any meaningful way.

Issue 4. Timing interaction between written representations and Issue Specific Hearings.

17. GACC are concerned that the concerns, if not adequately addressed at the start of the examination will impact upon the timing and interaction between written representations and the issue specific hearings.
18. Also, particularly in association with issues 1-3 above, GACC raises concern that the overall timing of this examination might impact many of the public presenting or wishing to be present at various ISHs, or participating fully in the process of written submissions. The majority will be attending voluntarily as unpaid representatives of their groups or as individuals. The timing of the DCO, continuing into July and August is likely to impact on holiday and childcare arrangements. Thus, early notification on subject dates must be a priority. It is our experience that some government consultations that are timed to coincide with school holiday periods are extended over this time. Might this be considered in this case?

Issue 5. Process to prioritise topics within ISH sessions.

19. GACC is concerned that topics lower down the agenda of ISH's are given sufficient time for discussion. For example, GACC notes the position of the noise envelope discussion as part of ISH5 but regards this as a fundamental issue requiring significant attention.
20. GACC would urge the ISH programme allows sufficient time to hear contributions from all groups and individuals whose relevant representations that make specific points regarding that particular topic.

Yours faithfully,

Peter Barclay

Chair, Gatwick Area Conservation Campaign