

Gatwick Airport Northern Runway Project

Change Application Report

Book 9

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Executive Summary

This Change Application Report supports a formal request to change the application submitted by Gatwick Airport Limited (the Applicant) for a development consent order under section 37 of the Planning Act 2008 for the proposed Gatwick Airport Northern Runway Project, accepted for Examination on 03 August 2023 (the Application).

The Applicant submitted notification of three proposed changes to the application (the Change Notification) on 27 November 2023, comprising a **Covering Letter** [AS-112] and **Notification of Proposed Project Changes Report** [AS-113] (the "Notification Report"). The need for the proposed changes was identified through continued refinement of the Project proposals, including having regard to feedback received from stakeholders, as explained in the Notification Report.

The Examining Authority (the ExA) set out its advice on the procedural implications of the three proposed changes and the scale and nature of the proposed consultation approach in its **Procedural Decision** [PD-008] dated 04 December 2023.

The Applicant subsequently carried out non-statutory consultation on the proposed changes between 13 December 2023 and 21 January 2024. The consultation feedback has been carefully considered prior to making this formal change request and this is explained in the accompanying **Consultation Report Addendum** (Doc Ref. 9.3).

The Applicant considers that the proposed changes are, individually and collectively, non-material. None of the changes would involve the inclusion of additional land within the Order Limits or require the acquisition of different or new rights over land, nor would any of the changes give rise to any materially new or materially different environmental effects in comparison to those assessed and reported in the **Environmental Statement** [APP-026 to APP-217, AS-023 and AS-024]. As such, The Infrastructure Planning (Compulsory Acquisition) Regulations 2010 ("CA Regulations") and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ("EIA Regulations") are not engaged by the proposed changes.

The Applicant considers that the proposed changes, either individually or collectively, would not be so substantial as to constitute a materially different project in nature or substance than that originally applied for. The **Procedural Decision** [PD-008] of 04 December 2023 confirms that the ExA is minded to agree with the Applicant's view.

The Applicant has considered responses to the consultation and considers that no amendments are required to the proposed changes as result of the responses. However, detailed responses to matters raised during consultation are set out in the **Consultation Report Addendum** (Doc Ref. 9.3).



The Applicant considers that there is sufficient time for the changes to be considered and incorporated into the Application without prejudicing any party or challenging the Examination Timetable.



1 Request to Change the Application

1.1. Introduction

- 1.1.1 Gatwick Airport Limited ("GAL" or the "Applicant") submitted an application for a development consent order (the "Application") under section 37 of the Planning Act 2008 for the proposed Gatwick Airport Northern Runway Project (the "Project"). The Application was subsequently accepted for Examination by the Planning Inspectorate (on behalf of the relevant Secretary of State) on 03 August 2023.
- 1.1.2 Since submission of the Application, the Applicant has continued to review the Project proposals including having regard to feedback received from stakeholders. The Applicant has identified three proposed changes to the Project (as detailed further in this document), which are the subject of this formal Change Request.
- 1.1.3 In the process of identifying and addressing changes to the Application, the Applicant has considered the Planning Inspectorate's Advice Note Sixteen: Requests to change applications after they have been accepted for examination ("Advice Note Sixteen") (Version 3 March 2023¹) and the Planning Act 2008: Guidance for the examination of applications for development consent.²
- 1.1.4 On 27 November 2023, the Applicant wrote to the ExA to notify its intention to propose three changes to the application (the Change Notification). The notification comprised a Covering Letter [AS-112] and Notification Report [AS-113]. The Notification Report set out the proposed changes, including the reasons for the changes, an environmental appraisal, a review of land right implications and proposed updates to the Application documents that would follow if the changes were made and accepted. It also put forward the Applicant's proposed consultation approach and indicative programme for the Examining Authority's consideration.
- 1.1.5 The Examining Authority set out its advice on the procedural implications of the three proposed changes and the scale and nature of the proposed consultation approach in its **Procedural Decision** [PD-008] dated 04 December 2023. The Applicant has followed the advice given there.
- 1.1.6 The Applicant subsequently carried out non-statutory consultation on the proposed changes between 13 December 2023 and 21 January 2024. The

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 $^{^{1}\,\}underline{\text{https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/advice-note-16/2}$

² https://assets.publishing.service.gov.uk/media/5a80dfeae5274a2e8ab52a7a/examinations_guidance-__final_for_publication.pdf



- consultation feedback has been duly considered prior to making this formal change request and the consultation feedback and the Applicant's response to it is set out in the accompanying **Consultation Report Addendum** (Doc Ref. 9.3).
- 1.1.7 The proposed changes are, individually and collectively, non-material. None of the changes would involve the inclusion of additional land within the Order Limits or require the acquisition of different or new rights over land, nor would any of the changes give rise to any materially new or materially different environmental effects in comparison with those assessed and reported in the **Environmental Statement** (ES) [APP-026 to APP-217, AS-023 and AS-024]. As such, The Infrastructure Planning (Compulsory Acquisition) Regulations 2010 ("CA Regulations") and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ("EIA Regulations") are not engaged by the proposed changes.
- 1.1.8 The Applicant considers that the proposed changes, either individually or collectively, would not be so substantial as to constitute a materially different project in nature or substance than that originally applied for. The **Procedural Decision** [PD-008] of 04 December 2023 confirms that the ExA is minded to agree with the Applicant's view.
- 1.1.9 The Applicant considers that there is sufficient time for the changes to be considered and incorporated into the Application without prejudicing any party or challenging the Examination Timetable.

1.2. Purpose of this Report

- 1.2.1 The purpose of this Change Application Report is to make a formal request to the ExA to change the Application (the Change Application). This report constitutes Step 4 of the process summarised on Figure 1 of Advice Note Sixteen in which the Applicant makes a formal request to the ExA to change the Application by providing the relevant information set out in Figure 2 of Advice Note Sixteen. The information requested in Figure 2a of Advice Note Sixteen was included in the **Notification Report** [AS-113] and the information requested in Figure 2b of Advice Note Sixteen is contained within this report and the accompanying information.
- 1.2.2 This Change Application Report provides a description of each proposed change, including the need for the change, details of engagement and consultation undertaken, an environmental appraisal of the changes identifying any new or different likely significant environmental effects, any land right implications and provides details of proposed changes to the relevant Application documents.



1.3. Report Structure

- 1.3.1 The remainder of this Change Application Report is structured as follows:
 - Section 2: Proposed Changes provides a summary of the three proposed changes, the environmental appraisal and any land implications of each change.
 - Sections 3 to 5 describe each of the proposed changes, the need for the changes, the environmental appraisal of each change and consequential amendments to the Application documents (which would be submitted to an Examination Deadline, should the changes be accepted).
 - Section 6: Combined Environmental Appraisal brings together the environmental appraisal of each change to consider if the combined environmental effects of the changes would result in new or materially different significant effects beyond those reported in the ES submitted as part of the Application.
 - Section 7: Non-Statutory Consultation explains how the proposed changes have been subject to consultation and the summary of issues raised;
 - Section 8: Conclusion sets out the conclusions of this report.



2 Proposed Changes

- 2.1. Overview of the Proposed Changes
- 2.1.1 **Table 1** provides a brief summary of the proposed changes, the materiality assessment and the justification for the proposed change.

Table 1: Summary of the Proposed Changes

Change No.	Change Title	Brief Summary	Materiality Assessment	Justification for the Proposed Change
Project Change 1	Extension to the design parameters for the NT IDL proposed southern extension	Extension to the design parameters for the North Terminal ("NT") International Departure Lounge ("IDL") proposed southern extension, and demolition of the Commercial Important Passengers ("CIP") lounge and circulation building.	Non-material	To provide greater design flexibility to deliver the proposed southern extension to the NT IDL.
Project Change 2	Reduction in height of the proposed replacement Central Area Recycling Enclosure ("CARE") facility and change in the purpose of the CARE facility	Reduction in height of the proposed replacement CARE facility, removal of the proposed biomass boilers and a change in the purpose of the CARE facility to become a waste sorting facility only.	Non-material	To remove the incineration of waste on site in line with GAL's sustainability policy, by changing the CARE facility to become a waste sorting facility only.



Project Change 3	Revision to the proposed water treatment works	Revision to the proposed surface water treatment works from a Moving Bed Biofilm Reactor ("MBBR") system to a constructed wetland (reed bed) system.	Non-material	To provide a more sustainable solution for surface water treatment.
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2.2. Environmental Appraisal

- 2.2.1 In accordance with Advice Note Sixteen (Figure 2a, item 4), the Applicant has undertaken a review and appraisal of the proposed changes against all topics within the Environmental Impact Assessment (EIA) to determine if any of the proposed changes, either individually or when combined, would result in any new or materially different significant effects beyond those reported in the **ES** [APP-026 to APP-046] submitted as part of the Application.
- 2.2.2 For each of the proposed changes individually and taken in-combination, the environmental appraisal has not identified any new or materially differently significant environmental effects from those reported in the ES. Relevant information from the environmental appraisal relevant to each change is provided in Sections 3 to 5 of this report and for combined changes in Section 6. Appendices containing further information are provided and where ES documents would be updated, if the change application request is accepted, the anticipated updates to those documents are outlined.
- 2.3. Compliance with the Infrastructure Planning (Compulsory Acquisition) Regulations 2010
- 2.3.1 All of the land required in respect of each of the changes falls within the existing Order Limits of the Application as accepted. The proposed changes would not result in any increase or reduction to the extent of the Order Land or require a change to the nature of the compulsory acquisition powers sought within the same areas of the Order Land.
- 2.3.2 Moreover, the procedure under the Infrastructure Planning (Compulsory Acquisition) Regulations 2010 is not engaged as the proposed changes do not provide for the acquisition of different or new land. All land relating to the proposed changes is land owned by the Applicant.
- 2.3.3 Additionally, there would be no changes to the existing land plots nor an introduction of new land plots as a result of any of the proposed changes.



2.4. Control Documents

- 2.4.1 Revised versions of the **Works Plans** (Doc Ref. 4.5) and **Parameter Plans** (Doc Ref. 4.7) have been submitted with this Change Application to provide the technical detail of the changes. The revised **Works Plans** and **Parameter Plans** are secured by the **Draft DCO** (Doc Ref. 2.1) and would ensure that the project changes are within the locations and parameters assessed as part of this Change Application.
- 2.4.2 The environmental appraisal of the Project Changes 1 to 3 has identified a number of mitigation measures that are required, in addition to those that are already proposed and secured through the Application, to mitigate impacts that may arise as a result of the Project Changes.
- 2.4.3 All of the additional mitigation measures required for these Project Changes will be secured through updates to existing control documents that the Applicant has already committed to complying with. For each Project Change, this Report identifies any revisions to mitigation measures secured in the Application or additional mitigation measures that are required to make the changes acceptable. This Report further identifies where such mitigation measures included in control documents that are secured by the **Draft DCO** (Doc Ref. 2.1).
- 2.4.4 Should this Change Request be accepted by the Examining Authority, the Applicant will submit revised versions of the following control documents including the measure identified throughout this report. The relevant securing mechanism has been included for reference:
 - Design Principles contained in Appendix A1 of the Design and Access Statement (Volume 5) [APP-257], secured under Requirement 4 of the Draft DCO (Doc Ref. 2.1);
 - Code of Construction Practice contained in ES Appendix 5.3.2 [APP-082], secured under Requirement 7 of the Draft DCO (Doc Ref. 2.1);
 - Outline Landscape and Ecology Management Plan contained in ES Appendix 8.8.1 [APP-113 to APP-116], secured under Requirement 8 of the Draft DCO (Doc Ref. 2.1);
 - ES Appendix 5.3.2: Code of Construction Practice Annex 3 Outline Traffic Management Plan [APP-085], secured under Requirement 12 of the Draft DCO (Doc Ref. 2.1);
 - ES Appendix 7.8.2: Written Scheme of Investigation for Post-consent Archaeological Investigations and Historic Building Recording – West Sussex [APP-106], secured under Requirement 14 of the Draft DCO (Doc Ref. 2.1);
 - ES Appendix 19.8.1: Public Rights of Way Management Strategy [APP-215], secured under Requirement 22 of the Draft DCO (Doc Ref. 2.1).

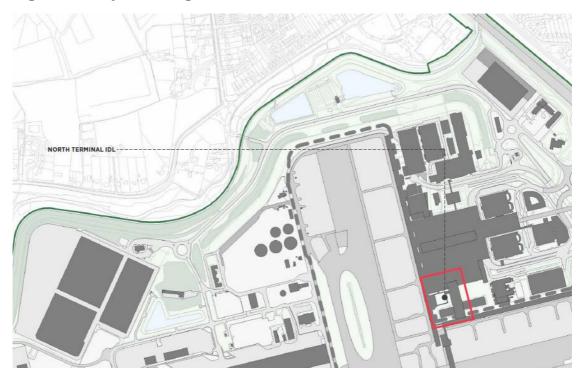


- 2.4.5 Further detail on the specific changes to each of the above control documents is set out in Tables 3, 5 and 7 of this report relevant to each of the proposed changes.
- 2.4.6 A revised **Mitigation Route Map** (contained in **ES Appendix 5.2.3** [APP-078]) will also be submitted should the Examining Authority accept this Change Request.



- 3 Project Change 1: Extension to the design parameters for the NT IDL proposed southern extension
- 3.1. Description of the Change
- 3.1.1 The Application, as submitted, proposes two extensions to the North Terminal ("NT") International Departure Lounge ("IDL") a northern extension and a southern extension, as referenced in Schedule 1 Work No. 22 of the **draft**Development Consent Order ("DCO") (Doc Ref. 2.1). The location of the NT IDL is shown in Figure 1 below.

Figure 1: Project Change 1 – location of the NT IDL southern extension



- 3.1.2 The first change ("Project Change 1") proposes amendments to the southern extension from that described within the Application, as set out below. Project Change 1 does not entail any changes to the northern extension of the IDL, which remains as set out in the Application.
- 3.1.3 Project Change 1 comprises:
 - Increase in the maximum plan parameters from up to 119 x 105 metres (width x length) to up to 120 x 175 metres.
 - Increase in the maximum height parameter (above ground level) from 27.5 metres to 30 metres.
 - Demolition of the CIP lounge building and the circulation building.



- Remedial works to the coaching gates.
- 3.1.4 The changes to the maximum parameters are shown in **Figures 2 and 3** below, along with labels identifying the location of the CIP lounge building and circulation building to be demolished.

Figure 2: Project Change 1 – image showing change to the maximum plan parameters

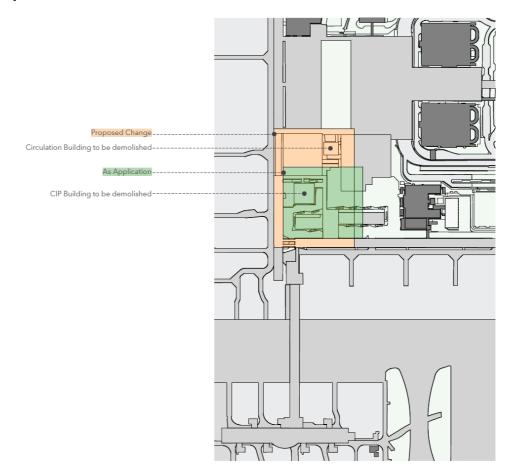
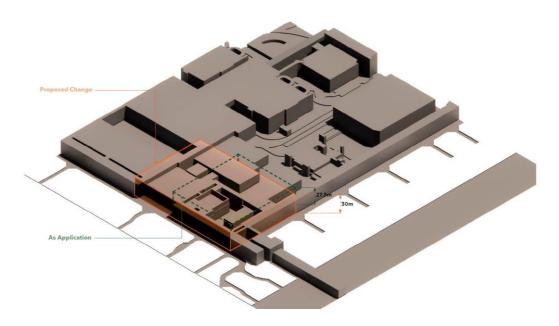




Figure 3: Project Change 1 – image showing change to the maximum height parameters



- 3.1.5 All other aspects of the proposed southern extension to the NT IDL remain as described for the Application, in that, whilst the design parameters would change, the extension would still have a maximum floorspace of 12,600m² as described in **ES Chapter 5: Project Description** (Doc Ref. 5.1). The indicative construction sequence, as set out in **ES Appendix 5.3.3: Indicative Construction**Sequencing [APP-088], is also unchanged.
- 3.1.6 Project Change 1 would not involve the addition of any further land to the Order Limits or require a change to the nature of the compulsory acquisition and temporary possession powers sought within the same areas of the Order Land.

3.2. Need for the Change

- 3.2.1 Project Change 1 seeks to increase the maximum design parameters of the proposed southern extension to the NT IDL to seek greater design flexibility for the subsequent detailed design stage, which is required to be approved under Requirement 4 of the **Draft DCO** (Doc Ref. 2.1).
- 3.2.2 The proposed southern extension to the IDL would accommodate a mix of retail, catering and general circulation space to ultimately provide a high-quality passenger focused environment. The Applicant has identified a need to increase the proposed southern extension's design parameters to provide greater flexibility for the future detailed design to be able to respond to the future needs of retail and catering operators and provide an enhanced service to passengers.



- 3.2.3 The proposed southern extension to the IDL would occupy space over Levels 10, 20 and 30, as specified in Schedule 1 Work No. 22 of the **Draft DCO** (Doc Ref. 2.1), cantilevered at ground floor level. Whilst the design parameters are proposed to be increased in height and plan, the design approach to provide a cantilever at ground floor level is unchanged. The maximum floorspace of the extension, being 12,600m², is also unchanged. Illustrative images of the proposed extension were provided in the **Design and Access Statement** (**Volume 3**) [APP-255] showing the indicative massing of the extension, namely in Figure 59, and which will be updated and submitted should the changes be accepted. The increased maximum height is within the acceptable envelope for aerodrome safeguarding.
- 3.2.4 As part of Project Change 1, it is proposed to demolish the existing CIP and circulation buildings. These buildings may require demolition to accommodate the proposed southern extension of the IDL, in line with the increased design parameters put forward under the proposed change, but this would be dependent on the final design solution (to be approved under Requirement 4 of the **Draft DCO**). The inclusion of these buildings for demolition is to provide maximum design flexibility to ensure the airport can provide the best solution to meet retail and catering operator needs.

3.3. Summary of the Environmental Appraisal

- 3.3.1 There would be no new significant effects or materially different significant effects from those reported in the **ES** [APP-026 to APP-046] for Project Change 1 and no new mitigation measures or revisions to the mitigation measures proposed in the Application are required.
- 3.3.2 Further information is provided in the environmental topic assessment in section 3.4 below.

3.4. Environmental Topic Assessment

3.4.1 The Applicant undertook an assessment of the environmental topics addressed in the ES to determine if the proposed Project change would result in any new or materially different significant effects from those reported in the **ES** [APP-026 to APP-046] submitted as part of the Application. Details of this assessment are provided in **Table 2**.



Table 2: Environmental Assessment of Project Change 1

Environmental Topic	Reported significant effects in the ES	Change in significant effects reported in the ES due to Project Change 1
Historic Environment	No heritage assets would be affected by the proposed NT IDL southern extension and no significant effects were identified.	There would be no new or materially different significant effects for Historic Environment.
	No significant adverse effects on landscape/townscape character and visual receptors as a result of the NT IDL southern extension were identified in the ES.	Revised photomontages and Zones of Theoretical Visibility (ZTVs) showing a comparison between the Application and the proposed Project changes have been prepared to inform the assessment.
	The proposed NT IDL southern extension would be located within the Gatwick Airport Urban Character Area. Overall effects on this character area are defined in the ES as minor adverse throughout the phases.	For Project Change 1, key photomontages that demonstrate the comparison are provided in Appendix A for the following: • Viewpoint 1 (Figures 1 to 4) • Viewpoint 15 (Figures 9 and 10)
Landscape, Townscape and Visual Resources	Moderate adverse visual effects on members of the public using the NT buildings and forecourt were identified in the ES. Near open views of the proposed NT IDL southern extension would be visible.	 Viewpoint 16 (Figures 11 to 14) Viewpoint 29 (Figures 23 to 26).
		The revised ZTV showing the comparison for Project Change 1 is provided in Appendix B , Figure 1.
	Pedestrians using pavements at Perimeter Road North are located at Viewpoint 1 (shown on ES Landscape, Townscape and Visual Resources Figures [APP-060 to APP-062]) and	Table 3 below sets out the revisions to the Application documents that would be undertaken if the change application is accepted.
	would gain clear views of the NT IDL southern extension. Minor adverse effects on receptors	The level of effect on the Gatwick Airport Urban Character Area



Environmental Topic	Reported significant effects in the ES	Change in significant effects reported in the ES due to Project Change 1
	were identified throughout the phases. Viewpoints 15, 16 and 29 [APP-	would not increase as a result of an increase in the size of the NT IDL southern extension.
	of to APP-062] are in distant or elevated locations where the proposed NT IDL southern extension would be visible and these are modelled in the photomontages in the ES [APP-060 to APP-062]. Negligible adverse effects on views as a result of the Project were identified for receptors at all these locations. The proposed NT IDL southern extension would theoretically be visible from Viewpoint 32 [APP-060 to APP-062] at Leith Hill due to the elevated nature of the	The maximum parameters for the proposed change to the NT IDL southern extension would be larger than that assessed in the ES and would remain prominent to members of the public using the NT buildings and forecourt, leading to a similar level of effect on receptors to that identified in the ES. Whilst the changed NT IDL southern extension would be likely to remain clearly visible from certain viewpoints (Viewpoints 1, 15, 16 and 29), the level of effect would not be greater due to the distance of the receptors from the extension and the presence of intervening
	location. However, due to the distance to the airport of over 11km, the individual development would be imperceptible within the context of existing built form. Negligible adverse effects on views as a result of the Project were identified for receptors in this location.	The change in the proposed NT IDL southern extension would also be imperceptible in distant views from Viewpoint 32 at Leith Hill and would not change the level of effects identified in the ES. Based on a review of the revised ZTV (Appendix B, Figure 1), which illustrates no significant change in area covered, it is also unlikely that Project Change 1 would result in views for new visual receptors.



Environmental Topic	Reported significant effects in the ES	Change in significant effects reported in the ES due to Project Change 1
		There would be no new or materially different significant effects for Landscape, Townscape and Visual Resources.
Ecology and Nature Conservation	The area comprises hard standing and no significant effects were identified in relation to the proposed NT IDL southern extension in the ES.	There would be no new or materially different significant effects for Ecology and Nature Conservation.
Geology and Ground Conditions	The area does not fall within any potential areas of concern in relation to contamination and no significant effects were identified in relation to the NT IDL southern extension in the ES.	The increase in parameters would not cover any additional potential areas of concern. There would be no new or materially different significant effects for Geology and Ground Conditions.
Water Environment	No significant effects were identified attributed to the NT IDL southern extension in the ES [APP-036].	The location of Project Change 1 is not near to any watercourses and is elevated above ground level and therefore there would not be a watercourse or flood risk interaction. Also, this is not a change that would have implications for water infrastructure. There would be no new or materially different significant effects for Water Environment.
Traffic and Transport	No effects were identified specifically for the NT IDL southern extension in the Traffic and Transport assessment in the ES [APP-037]. The assessment in the ES considered the total increase in trips associated with the	Project Change 1 would not materially change the number of construction or operational trips or result in any changes to surface access. There would be no new or materially different significant effects for Traffic and Transport.



Environmental Topic	Reported significant effects in the ES	Change in significant effects reported in the ES due to Project Change 1
	increase in passengers and staff resulting from the Project. Construction and operational trips associated with the NT IDL southern extension would be part of this increase. There would be no increase in floorspace or movements as a result of this change.	
Air Quality	No significant effects are identified for Air Quality in the ES.	There would be no new or materially different significant effects for Air Quality.
Noise and Vibration	No significant effects for construction and operation associated with the NT IDL southern extension are identified for noise in the ES.	There would be no new or materially different significant effects for Noise and Vibration.
Climate Change	No significant effects are identified for Climate Change in the ES.	The increase in the scale of the Project as a result of Project Change 1 is minor and would be unlikely to impact the urban heat island assessment or climate change resilience assessment. There would be no new or materially different significant effects for Climate Change.
Greenhouse Gases	Construction and operational emissions associated with the NT IDL southern extension are captured under the Construction and Airport Buildings and Ground Operations (ABAGO) elements of the ES. Emissions from construction and ABAGO have been reported within the ES to have a minor	Project Change 1 would not result in any new effects because the receptor of all Greenhouse Gases ("GHG") emissions is the global atmosphere. The Project Change is small in scale and unlikely to materially impact total GHG emissions reported in the ES, therefore the significance conclusions in the ES remain valid.



Environmental Topic	Reported significant effects in the ES	Change in significant effects reported in the ES due to Project Change 1
	adverse effect which is not significant.	There would be no new or materially different significant effects for GHG.
Socio- economics	No socio-economic receptors would be affected by the proposed NT IDL southern extension and no significant effects were identified in the ES.	The works associated with Project Change 1 during construction and operation would not alter the assumptions made in the ES on socio-economic effects. There would be no new or materially different significant
Health and Wellbeing	The NT IDL forms part of the built form of the airport. ES Chapter 18: Health and Wellbeing [APP-043] section 18.8 considered how visual change affects users of walking and cycling routes, as well as how populations are affected by changes in exposure to light and noise. Buildings can be both sources and barriers for such effects. The health assessment identified minor adverse (not significant) population health effects.	Project Change 1 has been considered and it would not materially change the implications of visual, noise or lighting effects for public health. Similarly, the other effects discussed in this table do not have implications for public health. There would be no new or materially different significant effects for Health and Wellbeing.
Agricultural Land Use and Recreation	No significant effects of relevance to the NT IDL southern extension are identified for Agricultural Land Use and Recreation in the ES.	Project Change 1 would not physically affect agricultural or recreational resources. There would be no new or materially different significant effects for Agricultural Land Use and Recreation.



- 3.5. Schedule of revisions to the Application Documents
- 3.5.1 **Table 3** identifies those documents that are provided as part of the Change Application in order to provide further technical detail (shaded in green); and/or identifies the revisions that would be made to key Application documents should the Change Application be accepted by the ExA (shaded in blue).

Table 3: Proposed DCO Application Document updates to reflect Project Change 1

PINS Ref.	DCO Document	Description of update	Revision	Doc Ref.
PDLA- 004	Draft Development Consent Order	Update to Work No. 22 in Schedule 1 to reflect Project Change 1.	4.0	Doc Ref. 2.1
<u>AS-017</u>	Works Plans – For Approval	Update to the Key Plan and Sheet 3 to reflect the increased parameters for the extension.	3.0	Doc Ref. 4.5
<u>APP-019</u>	Parameter Plans – For Approval	Update to the Key Plan and Work No. 22 (990111) to reflect the increased parameters for the extension.	2.0	Doc Ref. 4.7
PDLA- 006	ES Chapter 5: Project Description	Update to paragraph 5.2.106 to amend the dimensions of the southern extension, add the demolition of the CIP building and circulation building, and remedial works to the coaching gates; and update paragraph 5.3.81 to include the demolition activities.	3.0	Doc Ref. 5.1
PDLA- 008	ES Project Description Figures – Figure	Update to reflect the increased parameters for the extension.	3.0	Doc Ref. 5.2



	5.2.1a: Proposed Airport Works			
PDLA- 008	ES Project Description Figures – Figure 5.2.1h: Existing Facilities Proposed to be Demolished or Removed	Add the CIP and circulation buildings at North Terminal as buildings that will be demolished.	3.0	Doc Ref. 5.2
APP-060	ES Landscape, Townscape and Visual Resources Figures (Part 1) — Figure 8.4.1: Existing and Proposed ZTV within 5km radius study area; Figure 8.4.2: Existing and Proposed ZTV within wider landscape; and Figure 8.4.4: Existing ZTV and Viewpoint Locations	Update the proposed ZTV for Project Change 1. The comparison of the ZTV for the Application and with Project Change 1 is provided in Appendix B , Figure 1.	1.0	To be provided if the proposed Project Change is accepted by the ExA
APP-061 APP-062	ES Landscape, Townscape and Visual Resources Figures (Parts 2 and 3) – Figures 8.9.1 to 8.9.4; 8.9.41 to 44; 8.9.55 to 8.9.60; 8.9.105 to 8.9.116.	Update key representative photomontages for the Project change. Key photomontages showing the comparison between the Application and with Project Change 1 are provided in Appendix A (Figures 1 to 4, 9 to 14 and 23 to 26).	1.0	To be provided if the proposed Project Change is accepted by the ExA

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<u>APP-079</u>	ES Appendix 5.3.1: Buildability Report (Part A)	Update to Section 8.8 to reflect Project Change 1.	1.0	To be provided if the proposed Project Change is accepted by the ExA
<u>APP-255</u>	Design and Access Statement (Volume 3)	Update to Figure 59 showing the indicative massing of the proposed southern extension to reflect Project Change 1.	1.0	To be provided if the proposed Project Change is accepted by the ExA

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- 4 Project Change 2: Reduction in height of the proposed replacement CARE facility and change in its purpose
- 4.1. Description of the Change
- 4.1.1 The Application proposes to demolish the existing CARE facility located to the north of Taxiway Juliet and provide a replacement facility to the north west of the proposed Pier 7, as set out in Works No 8 and 9 of Schedule 1 of the **Draft DCO** (Doc Ref. 2.1).
- 4.1.2 The location of the proposed replacement CARE facility is shown in **Figure 4**.

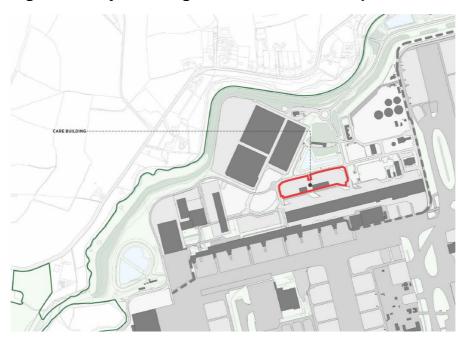
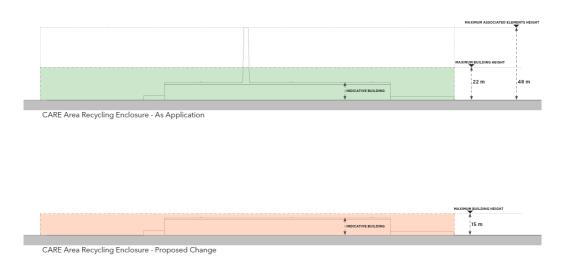


Figure 4: Project Change 2 – location of the replacement CARE facility

- 4.1.3 The second change detailed within this Change Application Report ("Project Change 2") comprises amendments to the proposed replacement CARE facility as follows:
 - Decrease in the maximum height parameter (above ground level) of the main building from 22 metres to 15 metres.
 - Removal of the proposed biomass boiler flue, which was proposed as being up to 48 metres in height in the Application.
 - Removal of the two proposed biomass boilers.
- 4.1.4 The change to the maximum height parameters is illustrated on **Figure 5** below.



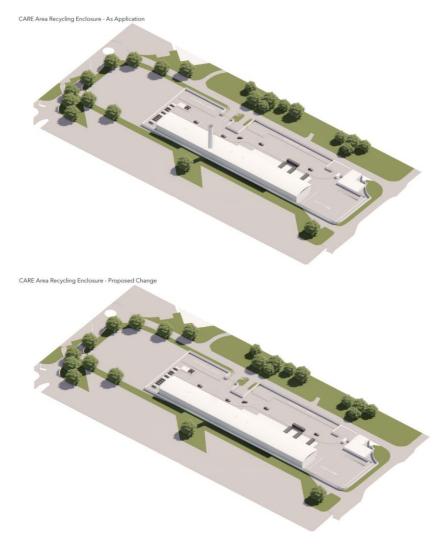
Figure 5: Project Change 2 – images showing changes to the height parameters



4.1.5 The proposed removal of the biomass boiler flue as part of the replacement CARE facility is shown in **Figure 6** below.



Figure 6: Project Change 2 – images showing the removal of the biomass boiler flue



- 4.1.6 The indicative construction sequencing in the Application (**ES Appendix 5.3.3**: Indicative Construction Sequencing [APP-088]) anticipated that the replacement CARE facility would be constructed in two phases; with the first phase of works being in 2024 to 2025; and a second phase in 2028 to 2029. The indicative construction sequence would change as a result of the Project Change 2 to one continuous phase of development from 2024 to 2029. The existing CARE facility would still remain in operation until the new CARE facility has been commissioned, as set out in **ES Chapter 5**: **Project Description** (paragraph 5.2.59) [PDLA-006].
- 4.1.7 All other aspects of the proposed replacement CARE facility remain as described in the Application, including the footprint, maximum depth (being up to 5 metres below ground level) and location of the replacement facility.



4.1.8 The change would not involve the addition of any further land to the Order Limits or require a change to the nature of the compulsory acquisition or temporary possession powers sought within the same areas of the Order Land.

4.2. Need for the Change

- 4.2.1 The Application proposes to demolish and replace the existing CARE facility including the food waste to heat capability with a biomass boiler. The biomass boiler previously processed organic waste from the terminal restaurants and domestic flights. Heat from the process was captured and used within the existing CARE facility (the heat was not used in the airport terminals or other buildings). The biomass boiler was switched off during the Covid-19 pandemic as the volume of organic waste being generated was too low to operate effectively without a continual supplement of diesel fuel to achieve sufficiently high temperatures. The boiler has remained switched off as the volume of organic waste produced at the airport remains low post-pandemic and therefore the biomass operation is not effective.
- 4.2.2 In line with the Applicant's ongoing drive to improve sustainability at the airport, the Applicant has considered opportunities to enhance the Project and has considered options that avoid re-instating the biomass operation which relies on the continual use of a supplementary diesel fuel, incompatible with GAL's net zero strategy. Project Change 2 facilitates this by changing the replacement CARE facility to become a material recovery facility only. Instead, waste material would be taken off-airport to dedicated waste processing centre(s) rather than being processed on site.
- 4.2.3 To facilitate the change Project Change 2 comprises the removal of the two proposed biomass boilers and the associated flue of up to 48 metres, together with an overall reduction in the maximum height of the main facility building.
- 4.2.4 The proposed footprint of the replacement facility building is unchanged from the Application. Whilst the biomass boilers would be removed, the space would be used for other recycling activities associated with the proposed CARE facility.

4.3. Summary of the Environmental Appraisal

- 4.3.1 There would be no new significant effects or materially different significant effects from those reported in the **ES** [APP-026 to APP-046] for Project Change 2 and no new mitigation measures or revisions to the mitigation measures proposed in the Application are required.
- 4.3.2 Further information is provided in the environmental topic assessment in section 4.4 below.



4.4. Environmental Topic Assessment

4.4.1 The Applicant undertook an assessment of the environmental topics addressed in the ES to determine if the proposed Project change would result in any new or materially different significant effects from those reported in the **ES** [APP-026 to APP-046] submitted as part of the Application. Details of this assessment are provided in **Table 4**.

Table 4: Environmental Assessment of Project Change 2

Environmental Topic	Reported significant effects in the ES	Change in significant effects reported in the ES due to Project change 2	
Historic Environment	No heritage assets would be affected by the proposed replacement CARE facility and no significant effects were identified in the ES.	There would be no new or materially different significant effects for Historic Environment.	
Landscape, Townscape and Visual Resources	No significant adverse effects on landscape/townscape character and visual receptors as a result of the proposed replacement CARE facility were identified in the ES. The proposed replacement CARE facility is located within the Gatwick Airport Urban Character Area. Overall effects on this character area are defined in the ES as minor adverse	For Project Change 2, key photomontages that demonstrate the comparison with the Application are provided in Appendix A for the following: • Viewpoint 15 (Figure 9 and 10) • Viewpoint 16 (Figure 11 to 14) • Viewpoint 27 (Figure 15 to 18) • Viewpoint 28 (Figure 19 to 22) • Viewpoint 29 (Figure 23 to 26). Two revised ZTVs showing the comparison for Project Change 2 are provided in Appendix B , Figure 2 and 3 (showing the 5km study area and the wider landscape respectively). Table 5 below sets out the revisions to the Application documents that would be undertaken if the Change Application is accepted.	



Environmental	Reported	Change in significant effects reported in the
Topic	significant effects in the ES	ES due to Project change 2
	throughout the phases. Viewpoints 15, 16, 27, 28 and 29 (shown on ES Landscape, Townscape and Visual Resources Figures [APP-060 to APP-062]) are in distant or elevated locations where the proposed replacement CARE facility would be visible and are modelled in the photomontages in the ES. Negligible adverse effects on views as a result of the Project were identified for receptors at all these locations. The proposed replacement CARE facility boiler flue would theoretically be visible from Viewpoint 32 [APP-060 to APP-062] at Leith Hill due to the elevated nature of the location however, due to the distance to the airport of over 11km and the slender	The removal of the biomass boilers and reduction in the scale and mass of built form from the proposed replacement CARE facility would be imperceptible for visual receptors in public locations outside of the airport and would not change any influence over the character of the surrounding landscape. The removal of the biomass boiler flue of up to 48m that was assessed in the ES, would reduce the visibility of the Project in many views and its ability to influence the surrounding landscape character (including nationally designated landscapes) assessed in the ES. Whilst the removal of the tallest element of the Project would be noticeable from certain viewpoints (Viewpoints 15, 16, 27, 28 and 29), the level of effect reported in the ES would not reduce from Negligible adverse to a No Change situation due to the remaining visibility of other elements of the Project. The change in the proposed replacement CARE facility would be imperceptible in distant views from Viewpoint 32 at Leith Hill and would not change the level of effects identified in the ES. Based on a review of the revised ZTV, which illustrates a minor, fragmented reduction in the area covered within the zone, some visual receptors identified within the ES would, theoretically, no longer experience visual effects, as a result of Project Change 2. There would be no new or materially different significant effects for Landscape, Townscape and Visual Resources.



Environmental Topic	Reported significant effects in the ES	Change in significant effects reported in the ES due to Project change 2
	nature of the flue, the individual development would be imperceptible within the context of existing built form. Negligible adverse effects on views as a result of the Project were identified for receptors in this location.	
Ecology and Nature Conservation	No significant effects due to changes in air quality were identified on ecology receptors in the ES.	Whilst Project Change 2 would reduce air emissions within the local area, this would not change the level of effect. There would be no new or materially different significant effects for Ecology and Nature Conservation.
Geology and Ground Conditions	No significant effects were identified in relation to the proposed replacement CARE facility in the ES.	There would not be a change in the footprint from Project Change 2, therefore the effects would not be different to those in the ES. There would be no new or materially different significant effects for Geology and Ground Conditions.
Water Environment	No significant effects were identified attributed to the proposed replacement CARE facility.	The location of Project Change 2 is not near to any watercourses and therefore there would not be a watercourse or flood risk interaction. Also, the Project change would not have implications for water infrastructure. There would be no new or materially different significant effects for Water Environment.
Traffic and Transport	No effects were identified specifically for the proposed replacement CARE	The Project change would not materially increase the number of construction or operational trips. The volume of operational vehicle trips associated with the proposed

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Environmental Topic	Reported significant effects in the ES	Change in significant effects reported in the ES due to Project change 2
	facility in the Traffic and Transport assessment in the ES. The assessment in the ES is based on the existing operation of the airport, which includes trips associated with the existing CARE facility, together with the increase in trips associated with the increase in passengers and staff resulting from the Project.	replacement CARE facility is expected to be very small, in the region of fewer than six vehicle trips a day. This level of trip generation is not expected to be perceptible on the highway network or have a material impact on the outcomes of the assessment presented in the ES. Project Change 2 would also not result in any changes to surface access. There would be no new or materially different significant effects for Traffic and Transport.
Air Quality	No significant effects were identified for air quality in the ES.	Project Change 2 includes removal of the biomass boilers and stack that were modelled as part of the proposed replacement CARE facility in the ES. Therefore, predicted impacts would be the same or lower than in the ES. There would be no new or materially different significant effects for Air Quality.
Noise and Vibration	During construction and operation the effects identified from the proposed replacement CARE facility in the ES are not significant. ES Appendix 14.9.3: Ground Noise Modelling [APP-173] established noise limits for the acoustic	The construction works for Project Change 2 would not change the results of the assessment in the ES. The removal of the proposed biomass boilers would mean there would be less need for attenuation to noise. The acoustic design requirements for the remainder of the facility remain unchanged and are expected to be met, as in the ES. There would be no new or materially different significant effects for Noise and Vibration.



Environmental Topic	Reported significant effects in the ES	Change in significant effects reported in the ES due to Project change 2
	design of the facility that would be met. It also identified the biomass boiler exhaust fans as a possible source of low frequency noise that would require attenuation.	
Climate Change	No significant effects were identified for Climate Change in the ES.	The reduction in scale of the proposed replacement CARE facility and removal of the stack would not change the impact on the resilience of the asset identified in the ES. There would be no new or materially different significant effects for Climate Change.
Greenhouse Gases	Construction and operational emissions associated with the proposed change are captured under the Construction and ABAGO elements of the ES. Emissions from construction and ABAGO are reported within the ES to have a minor adverse effect which is not significant.	Project Change 2 would not result in any new or different significant environmental effects because the receptor of all GHG emissions is the global atmosphere. The proposed change is small in scale and unlikely to materially impact total GHG emissions reported in the ES, therefore the significance conclusions in the ES remain valid. There would be no new or materially different significant effects for GHG.
Socio- economics	The construction of the proposed replacement CARE facility was taken into account in the	The construction sequencing for the proposed replacement CARE facility would change from two phases (2024-25, 2028-29) to a single phase over 2024-2029. However, it is not considered that this would change the potential



Environmental Topic	Reported significant effects in the ES	Change in significant effects reported in the ES due to Project change 2
	assessment of construction workforce effects during the initial construction period (2024-2029). These effects were assessed as moderate beneficial (significant) in the ES for the Project overall.	impacts in terms of construction employment for the Project as assessed within the ES during the initial construction period on the basis that: 1) the proposed replacement CARE facility represents only part of the total Project construction activity that would be taking place; and 2) the time period during which the proposed replacement CARE facility would be constructed would be the same (i.e. 2024-2029). The effect on construction employment would
		therefore remain moderate beneficial (significant). There would be no new or materially different significant effects for Socio-economics.
Health and Wellbeing	The proposed replacement CARE facility is one of the Project emission sources that was modelled and reported on in ES Chapter 13: Air Quality [APP-038]. The quantitative analysis in Chapter 13 informed the ES Chapter 18: Health and Wellbeing [APP-043] section 18.8 consideration of the public health implications of the changes in air	Project Change 2 would represent an improved position due to the removal of the biomass boilers, reducing total annual emissions with the Project. Effects on air quality would be similar or improved for public health compared to that predicted in the ES. Other effects discussed in this table do not have implications for public health, for example removal of the stack does not change the public health conclusions associated with visual change. There would be no new or materially different significant effects for Health and Wellbeing.



Environmental Topic	Reported significant effects in the ES	Change in significant effects reported in the ES due to Project change 2	
	quality. The health assessment identified a minor adverse (not significant) population health effect in relation to all modelled sources.		
Agricultural Land Use and Recreation	No significant effects of relevance to this Project change are identified for Agricultural Land Use and Recreation in the ES.	Project Change 2 would not physically affect agricultural or recreational resources. There would be no new or materially different significant effects for Agricultural Land Use and Recreation.	

4.5. Schedule of revisions to the Application Documents

4.5.1 **Table 5** identifies those documents that are provided as part of the Change Application in order to provide further technical detail (shaded in green); and/or identifies the revisions that would be made to key Application documents should the Change Application be accepted by the ExA (shaded in blue).

Table 5: Proposed DCO Application Document updates to reflect Project Change 2

PINS	DCO	Description of update	Revision	Doc Ref.
Ref.	Document	Description of apaate	Kevision	DOC Rei.
PDLA- 004	Draft Development Consent Order	Update to Work No. 9 in Schedule 1 to reflect Project Change 1.	4.0	Doc Ref. 2.1
<u>APP-019</u>	Parameter Plans – For Approval	Update to the Key Plan and Work No. 9 (990107) to reflect the change in the height parameters for the replacement CARE facility.	2.0	Doc Ref. 4.7
PDLA- 006	ES Chapter 5: Project Description	Update to paras 5.2.58 to 5.2.60 to amend the description of the proposed replacement CARE facility	3.0	Doc Ref. 5.1



		including removal of the		
		stack.		
<u>APP-060</u>	ES Landscape, Townscape and Visual Resources Figures (Part 1) – Figure 8.4.1: Existing and Proposed ZTV within 5km radius study area; Figure 8.4.2: Existing and Proposed ZTV within wider landscape; and Figure 8.4.4: Existing ZTV and Viewpoint Locations	Update the proposed ZTV for the Project change. The comparison of the ZTVs for the Application and with Project Change 2 are provided in Appendix B , Figure 2 and 3.	1.0	To be provided if the proposed Project Change is accepted by the ExA
APP-061 APP-062	ES Landscape, Townscape and Visual Resources Figures – Figures 8.9.1 to 8.9.4; 8.9.41 to 44; 8.9.55 to 8.9.60; 8.9.105 to 8.9.116.	Update key representative photomontages for the Project change. Key photomontages showing the comparison between the Application and with Project Change 1 are provided in Appendix A (Figures 9 to 26).	1.0	To be provided if the proposed Project Change is accepted by the ExA
APP-079	ES Appendix 5.3.1: Buildability Report (Part A)	Update to paragraphs 8.6.6 to 8.6.9 to reflect Project Change 2.	1.0	To be provided if the proposed Project Change is accepted by the ExA



				To be
	ES Appendix			provided if
	5.3.3:	Update to the anticipated		the proposed
APP-088	Indicative	construction timing of the	1.0	Project
	Construction	CARE facility.		Change is
	Sequencing			accepted by
				the ExA

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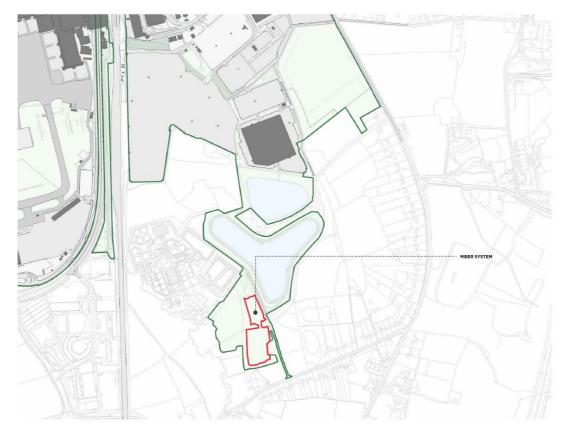


5 Project Change 3: Revision to the proposed water treatment works

5.1. Description of the Change

5.1.1 The Application, as submitted, proposed surface water treatment works using a Moving Bed Biofilm Reactor (MBBR) system to treat de-icer contaminated rainwater run-off and discharge from the existing pollution storage lagoons, as referenced in Schedule 1 Work No. 43 of the **Draft DCO** (Doc Ref. 2.1). The location of the surface water treatment works, as proposed in the Application, is shown in **Figure 7** below.

Figure 7: Project Change 3 – location of water treatment works



- 5.1.2 The third change to the Project ("Project Change 3") comprises amendments to the proposed water treatment works as follows:
 - Change to the water treatment process from a MBBR system to a constructed wetland (reed bed) system entailing different structures and features (described further below).
 - Increase in the footprint for the proposed water treatment works to accommodate the constructed wetland (reed bed) system from up to



- 5,600m² to an area of approximately 16,000m² (16 hectares). The additional land to accommodate the constructed wetland (reed beds) is located to the south of the area previously proposed for the MBBR system and is wholly within the existing Order Limits.
- Provision of an additional temporary construction compound up to 5,000m²
 (0.5 hectares) in area.
- Provision of a temporary 2.4m high noise barrier during construction, located along the southern side of the southern pond.
- 5.1.3 **Figures 8 and 9** below illustrate the proposed constructed wetland (reed bed) system.

Figure 8: Project Change 3 – aerial sketch of the proposed constructed wetland (reed bed) system





Figure 9: Project Change 3 – sketch of the proposed constructed wetland (reed bed) system



- 5.1.4 The proposed constructed wetland system would use reed beds with Forced Bed Aeration (FBA) technology to treat the de-icer contaminated waters. The wetlands act as attached-growth biological reactors and accelerate the degradation of organic compounds (such as de-icing chemicals). The system functions by naturally occurring bacteria attaching to the surface of the gravel media to form biofilms. When the contaminated water is distributed across the surface area of the beds, it percolates vertically down through the saturated gravel media. The contact between the contaminants and the biofilms results in biological contaminant degradation and reduced concentrations of organic matter. The FBA system evenly distributes oxygen across the reed beds to maintain aerobic conditions, where necessary, as degradation is more efficient under aerobic conditions.
- 5.1.5 The system would draw 100 l/sec from the de-icer pollution storage lagoons and treat this to a standard that would allow discharge to the Gatwick Stream. This rate is unchanged from the proposal in the Application.
- 5.1.6 Six wetland areas are proposed as part of Project Change 3, constructed in pairs, surrounded by embankments and timber post and rail fencing. The reed beds would comprise a mix of wetland vegetation species (including those that are resilient to climate change) to create a variety of habitat types. Each reed bed would be lined to prevent groundwater ingress. The design of the reed beds will take into account the need to be resilient to climate change (including accommodating increasing temperatures, extreme cold, drought, heavy rainfall, high winds and lightning strikes).
- 5.1.7 Six blowers are proposed to facilitate the FBA system, provided along with acoustic hoods and enclosed by acoustic fencing. The blowers would run



continuously in the winter (to prevent stagnation) and intermittently during the summer.

- 5.1.8 Key components of the constructed wetland (reed bed) system include:
 - bunded nutrient dosing tank and pumps;
 - pipework, pumps and blowers;
 - bunding;
 - Maintenance access
- 5.1.9 A cabin, secure storage unit and area used for car parking by Gatwick Greenspace Partnership volunteers, which will be removed during the construction works, will be reprovided within the overall scheme
- 5.1.10 Each of the components listed above would have a maximum height of 3 metres, excluding the cabin and secure storage which would be up to 4 metres in height (above ground level).
- 5.1.11 There would be no odour emissions from the reed beds during the summer. In the winter months during normal operating conditions (providing the blowers are operating correctly and the organic loading into the systems remains within the design load), complete degradation of de-icers would be achieved and there would be no associated odour. The reed beds would be inspected weekly during the winter and any necessary maintenance would be identified and carried out.
- 5.1.12 The indicative construction sequencing in the DCO Application (**ES Appendix** 5.3.3: Indicative Construction Sequencing [APP-088]) anticipated that construction of the surface water treatment works (MBBR system) would take place from 2027 to 2028. Instead, it is anticipated that the water treatment works would be constructed from 2025 to 2026 to provide the constructed wetland (reed bed) system. This is due to the proposed constructed wetland system covering a larger area and potentially requiring more extensive ground works than the MBBR system.
- 5.1.13 The proposed change would not involve the addition of any further land to the Order Limits or require a change to the nature of the compulsory acquisition and temporary possession powers sought within the same areas of the Order Land (with further detail set out in Section 4 of this report).
- 5.2. Need for the Change
- 5.2.1 The Application, as submitted, proposed a MBBR system to treat de-icer contaminated stormwater run-off. Project Change 3 proposes to provide a more sustainable solution for water treatment through the replacement of the MBBR system with a constructed wetland (reed bed) solution. The change has been



- identified through continuous design development carried out in line with the Applicant's own sustainability aspirations.
- 5.2.2 The proposed constructed wetland system would result in less energy consumption and also provide the opportunity for biodiversity benefits through the provision of wetland vegetation species, creating a variety of habitat types.

5.3. Summary of the Environmental Appraisal

- 5.3.1 There would be no new significant effects or materially different significant effects from those reported in the ES [APP-026 to APP-046] for Project Change 3. There are several topics which require additional or revised mitigation measures to those that are included in the Application. These are described in the table below and are all changes to existing control documents.
- 5.3.2 Further information is provided in the environmental topic assessment in section 5.4 below.

5.4. Environmental Topic Assessment

5.4.1 The Applicant undertook an assessment of the environmental topics addressed in the ES to determine if the proposed Project change would result in any new or materially different significant effects from those reported in the **ES** [APP-026 to APP-046] submitted as part of the Application. Details of this assessment are provided in **Table 6**.

Table 6: Environmental Assessment of Project Change 3

Environmental Topic	Reported significant effects in the ES	Change in significant effects reported in the ES due to Project change 3
ТОРІС	enects in the LO	
Historic	An effect of up to major adverse significance for the impact of the proposed	The effect of up to major adverse significance would remain as reported in the ES.
Environment	water treatment works on buried archaeological remains was identified in the ES.	The Strip, Map and Sample archaeological ³ investigation proposed for the water treatment works area in the ES would need to be amended to include

³ The area is stripped of topsoil and any underlying subsoil. This activity occurs under archaeological supervision. Any archaeological features are then mapped and a decision is made regarding how much of each feature should hand-excavated by the archaeologists – this is the 'sample excavation'. The decision-making is collaborative and involves the local authority's archaeological adviser, the developer's archaeological consultant and the appointed archaeological contractor.

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Environmental	Reported significant	Change in significant effects reported
Topic	effects in the ES	in the ES due to Project change 3
		the reed beds and potentially the compound area. Consequently, ES Appendix 7.8.2 Written Scheme of Investigation for West Sussex [APP-106] would be amended accordingly (see Table 7 regarding revisions to the Application documents).
		There would be no new or materially different significant effects for Historic Environment.
Landscape, Townscape and Visual Resources	No significant adverse effects on landscape/townscape character and visual receptors as a result of the water treatment works are identified in the ES. The proposed water treatment works would be located within the Gatwick Airport Urban Character Area. Overall effects on this character area were defined in the ES as minor adverse throughout the phases. Moderate adverse visual effects on walkers at Viewpoint 11: footpath 360/1Sy Tinsley Green (shown on ES Landscape, Townscape and Visual Resources Figures [APP-060 to APP-062]) were identified in the ES.	For Project Change 3, key photomontages that demonstrate the comparison are provided in Appendix A for Viewpoint 11 (Figures 5 to 8). Table 7 below sets out the revisions to the Application documents. The level of effect on the Gatwick Airport Urban Character Area identified in the ES would not change as a result of Project Change 3 from a surface water treatment works using a MBBR system to a constructed wetland (reed bed) system. There would be a reduction in the height, scale and mass of built form and an increase in development footprint as a result of Project Change 3. On balance, this would represent a slight improvement to this element of the Project. The proposed reed beds and ancillary structures would be clearly visible from Viewpoint 11 footpath 360/1Sy Tinsley Green, however due to the relatively low level and semi-natural nature of the development, the moderate adverse effect in 2024 to 2029 and 2030 to 2032, reducing to minor adverse in 2033 to 2038 and beyond, identified in the ES, would not change due to the reduced



Environmental	Reported significant	Change in significant effects reported
Topic	effects in the ES	in the ES due to Project change 3
		proximity of Project Change 3 to the receptor.
		There would be no new or materially different significant effects for Landscape, Townscape and Visual Resources.
		Should Project Change 3 be accepted by the ExA, ES Appendix 8.8.1: Outline Landscape and Ecological Management Plan [APP-113 to APP-116] will be revised to include a tree survey and concept designs of the reed beds (see Table 7).
Ecology and Nature Conservation	No significant effects from the proposed water treatment works comprising the MBBR system were identified in the ES. A number of negligible, non-significant effects were described including effects on great crested newt (GCN) and the Gatwick Stream from the construction of the water treatment works and the discharge of waters, respectively. Although not significant in EIA terms, the impact to GCN and associated loss of grassland due to the proposed water treatment works in the ES would be mitigated by proposals for the Brook Farm habitat creation area.	The area of Project Change 3 forms part of the Gatwick Land East of the Railway Biodiversity Area. The permanent loss of grassland due to the proposed water treatment works in the ES would be mitigated by the Brook Farm habitat creation area. The loss of grassland to create the reed beds would be minor adverse in the medium term until grassland within the Brook Farm habitat creation area matures, after which the effect would be minor beneficial as the area created in Brook Farm is larger than the area lost to the reedbeds. Grassland temporarily lost as a result of the construction compound for the reed beds would be re-instated post construction. This would be a short-term minor adverse effect that is negligible in the long term. The creation of reed bed itself would be a minor beneficial effect, once mature. There would be no change to the assessment of effects on either GCN or the Gatwick Stream.



Environmental Topic	Reported significant effects in the ES	Change in significant effects reported in the ES due to Project change 3
		The change in habitat type associated with Project Change 3 would be addressed in a revised ES Appendix 9.9.2: Biodiversity Net Gain Statement [APP-136] (see Table 7).
		There would be no new or materially different significant effects for Ecology and Nature Conservation.
Geology and Ground Conditions	No significant effects were identified in relation to the proposed water treatment	The footprint of Project Change 3 does not fall within any potential areas of concern in relation to contamination. Therefore, the effects reported in the ES for the proposed water treatment works would not be different.
	works in the ES.	There would be no new or materially different significant effects for Geology and Ground Conditions.
Water Environment	The ES identified an environmentally significant moderate beneficial effect to the surface water quality	The moderate beneficial effect to the surface water quality of the River Mole and Gatwick Stream as a result of the new treatment facility would remain the case with the change in treatment approach.
	of the River Mole and Gatwick Stream as a result of the proposed treatment facility. The new discharge to the Gatwick Stream would result in a non-significant	The non-significant minor beneficial environmental effect to the geomorphology of the Gatwick Stream resulting from the new discharge to the Gatwick Stream would remain the case with the proposed change in treatment approach.
	minor beneficial environmental effect to the geomorphology of the Gatwick Stream.	There would not be a watercourse or flood risk interaction as the proposed works is located outside the floodplain of the Gatwick Stream. The discharge from the new works would utilise an existing outfall pipe from the long-term storage



Environmental	Reported significant	Change in significant effects reported
Topic	effects in the ES	in the ES due to Project change 3
		lagoons so would not require construction within the floodplain or the watercourse channel. Also, the proposed inflow and outflow peak flows and routes to the reed beds would be unchanged from those associated with the water treatment works proposed in the ES. Similarly, the de-icer treatment parameters would be unchanged. There would be no new or materially
		different significant effects for Water Environment.
Traffic and Transport	No effects were identified specifically for the proposed water treatment works in the Traffic and Transport assessment in the ES. The assessment in the ES considered the total increase in trips associated with the increase in passengers and staff resulting from the Project. Trips to the water treatment works would be part of this increase. Construction of the water treatment works fell within the period addressed by the 'airfield construction' assessment in the ES.	Construction of the proposed reed beds is estimated to be over 12 months, with the peak construction period being 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, this level of vehicle trips would not change the effects identified in the ES chapter for the period of airfield construction. The Outline Construction Traffic Management Plan that forms Annex 3 of ES Appendix 5.3.2 Code of Construction Practice [APP-085] would be updated to show the construction access to the reed beds work area (see Table 7). During operation, the reed bed solution would generate a very low number of trips associated with inspection and maintenance requirements, that would be unlikely to be perceptible on the highway network.



Environmental Topic	Reported significant effects in the ES	Change in significant effects reported in the ES due to Project change 3
		There would be no new or materially different significant effects for Traffic and Transport.
		Following best practice maintenance of constructed wetland (reed bed) systems, there would be no odour emissions as set out in Section 5.1 of this report. Therefore, there would be no significant odour effects associated with the facility and no further mitigation for odour would be required.
		The additional construction compound associated with Project Change 3 comprises additional Non-Road Mobile Machinery (NRMM) activity, construction routes and construction vehicle movements.
Air Quality	No significant effects were identified for air quality in the ES.	The primary construction route that would be used for the site is included in the modelled construction traffic network. The ES takes a conservative approach for construction traffic effects, assessing the worst-case year for construction. Given that the works would generate a very low number of trips, unlikely to be perceptible on the highway network, the traffic associated with Project Change 3 is not likely to change the results of the assessment.
		NRMM activities associated with the temporary construction compound for the reed beds are not expected to create significant effects given the NRMM source apportionment contribution from other construction compounds across the site. A sensitivity test has been carried out to evaluate the impact of the NRMM



Environmental	Reported significant	Change in significant effects reported
Topic	effects in the ES	in the ES due to Project change 3
		activities on sensitive receptors closest to the construction and this demonstrates that there are not anticipated to be any new or materially different significant effects for Air Quality as a result of NRMM activity (see Appendix C). In addition, measures will be implemented through ES Appendix 5.3.2: Code of Construction Practice [APP-082] to ensure air quality impacts of construction are minimised.
		There are not anticipated to be any new or materially different significant effects for Air Quality.
Noise and Vibration	During construction and operation the effects identified from the water treatment works in the ES are not significant. ES Appendix 14.9.3 Ground Noise Modelling [APP-173] established noise limits for the acoustic design of the facility that would be met.	The location of Project Change 3 borders Noise Sensitive Receptor 11 Tinsley Green (this is shown in ES Figure 14.4.2 [APP-063]). The nearest individual Noise Sensitive Receptors (NSRs) are the travelers' site and houses on Radford Road to the south. Noise modelling has been undertaken for the Project change to identify appropriate mitigation measures. Appendix D provides detail of the noise modelling undertaken. Noise from construction activities and construction traffic would be mitigated by a 2.4m high temporary noise barrier, located along the south side of the southern pond construction area together with Best Practicable Means to reduce noise on site as required under the Code of Construction Practice (ES Appendix 5.3.2 [APP-082]). During operation, the main source of noise would be from the blowers. These would have acoustic hoods and be enclosed by acoustic fencing to further



Environmental Topic	Reported significant effects in the ES	Change in significant effects reported in the ES due to Project change 3
		reduce noise levels to NSRs. Noise from the blowers would not be significant.
		There would be no new or materially different significant effects for Noise and Vibration.
Climate Change	No significant effects were identified for Climate Change in the ES.	The maintenance commitments are identified in section 5.1 and the reed beds would be designed and maintained in such a way as to be resilient to climate change (including accommodating increasing temperatures, extreme cold, drought, heavy rainfall, high winds and lightning strikes). The blowers specified can continue to operate in different climate conditions and therefore would be resilient to any increases or decreases in temperature during hot or cold spells. Maintenance commitments would be reflected in the Outline Landscape and Ecology Management Plan [APP-113 to APP-116] should the change be accepted by the ExA.
		The Applicant would continue to support Crawley Borough Council in their statutory port heath duties regarding mosquito-borne diseases, including reviewing any changes in the frequency and location of mosquito monitoring. There would be no new or materially
		different significant effects for Climate Change.
Greenhouse Gases	Construction and operational emissions associated with the proposed water treatment works are captured under the construction and	Project Change 3 would not result in any new effects because the receptor of all GHG emissions is the global atmosphere. Project Change 3 is small in scale and unlikely to materially impact total GHG emissions reported in the ES, therefore



Environmental	Reported significant	Change in significant effects reported
Topic	effects in the ES	in the ES due to Project change 3
	ABAGO elements of the ES.	the significance conclusions in the ES remain valid.
	Emissions from construction and ABAGO have been reported within the ES to have a minor adverse effect which is not significant.	There would be no new or materially different significant effects for GHG.
Socio- economics	The construction of the proposed water treatment works comprising a MBBR system forms part of the assessment of construction workforce effects during the initial construction period (2024-2029). These effects were assessed as moderate beneficial (significant) in the ES for the Project overall.	The construction timing for the proposed water treatment works based on Project Change 3 would take place earlier, moving from 2027-28 to 2025-26. However, it is not considered that this would change the potential impacts in terms of construction employment for the Project as assessed within the ES during the initial construction period on the basis that: 1) the proposed water treatment works represents only part of the total Project construction activity that would be taking place; and 2) the duration and timing of construction would continue to take place during the initial construction period (i.e. 2024-2029). There would be no new or materially different significant effects for socioeconomics.
Health and Wellbeing	The reed beds would form part of the habitat around the airport. ES Chapter 18: Health and Wellbeing [APP-043], Section 18.8 considers Port Health	The public health implication of the Project change has been assessed. The implications for delivering Port Health functions have been considered, notably surveillance of non-endemic mosquito species. The area of the proposed reed



Environmental	Reported significant	Change in significant effects reported
Topic	effects in the ES	in the ES due to Project change 3
	effects, including surveillance of new disease vectors around the airport e.g. nonendemic mosquito species. The health assessment identified a minor adverse (not significant) effect in relation to the impact on local healthcare capacity, including those with responsibility for Port Health.	beds represents a small part of the habitat around the airport and the habitat type (gravel reedbeds without surface water) does not promote mosquito breeding. Key design features of the reed beds include aeration and lack of open water (water level is maintained approximately 50mm below the surface of the gravel medium), would mean there is not stagnant surface water. Consequently, the disease vector risk and additional surveillance implications for Port Health are equivalent to those assessed in the ES.
	Other assessments in Chapter 18 section 18.8 include the public health implications of changes in noise, air quality, use of footpaths and cycleways and water quality. It is concluded that these are associated with minor adverse (not significant) population health effects.	Other effects discussed in this table would not change the Project's implications for public health. This includes that consideration has been given to the scale of change and mitigation in relation to noise effects from aeration pumps, odour, recreational routes and the quality of discharged treated water. The de-icer treatment, by a constructed wetland (reed bed) solution, would continue to represent an improved position for water quality. That the reed beds would be fenced and water levels would be below the gravel medium meaning there is not anticipated to be safety implications for public health. There would be no new or materially
		different significant effects for Health and Wellbeing.
Agricultural Land Use and Recreation	No significant adverse effects on agricultural land use and recreation receptors as a result of the	The area proposed for Project Change 3 forms part of the Gatwick biodiversity area which the public are able to access informally for recreation. Access to the area would need to be controlled during



Environmental	Reported significant	Change in significant effects reported
Topic	effects in the ES	in the ES due to Project change 3
		,
		for the footpath (see Table 7).



Environmental Topic	Reported significant effects in the ES	Change in significant effects reported in the ES due to Project change 3
		There would be no new or materially different significant effects for Agricultural Land Use and Recreation.

- 5.5. Schedule of revisions to the Application Documents
- 5.5.1 **Table 7** identifies those documents that are provided as part of the Change Application in order to provide further technical detail; and/or identifies the revisions that would be made to key Application documents should the Change Application be accepted by the ExA.
- 5.5.2 This project change does not require any updates to the **Draft DCO** (Doc Ref. 2.1) or the **Explanatory Memorandum to the Draft DCO** [AS-006] hence they are excluded from **Table 7**.

Table 7: Proposed DCO Application Document updates to reflect Project Change 3

PINS Ref.	DCO Document	Description of update	Revision	Doc Ref.
AS-017	Works Plans – For Approval	Update to the Key Plan and Sheet 7 to reflect the larger works area for the water treatment works.	3.0	Doc Ref. 4.5
<u>APP-019</u>	Parameter Plans – For Approval	Update to the Key Plan to reflect the larger works area for the water treatment works.	2.0	Doc Ref. 4.7
PDLA- 006	ES Chapter 5: Project Description	Update para 5.2.164 to reflect the change to the system for the water treatment works; update paras 5.2.171 to 5.2.171 to describe the proposed reed bed system; update 5.3.49 to amend the reference from water treatment works to reed bed system in the context of construction activities from 2024 to 2029; update 5.3.86 to add the reed bed	3.0	Doc Ref. 5.1



		compound to the list of construction compounds; and add a new section to describe key construction components of the reed bed system.		
PDLA- 008	ES Project Description Figures – Figure 5.2.1e: Proposed Surface Water and Foul Water Improvements	Update location and footprint for Project Change 3.	3.0	Doc Ref. 5.2
PDLA- 008	ES Project Description Figures – Figure 5.2.1f: Proposed Temporary Construction Compounds	Update to add the temporary construction compound associated to Project Change 3.	3.0	Doc Ref. 5.2
APP-061 APP-062	ES Landscape, Townscape and Visual Resources Figures – Figures 8.9.1 to 8.9.4; 8.9.41 to 44; 8.9.55 to 8.9.60; 8.9.105 to 8.9.116.	Update key representative photomontages for the Project change. Key photomontages showing the comparison between the Application and with Project Change 3 are provided in Appendix A (Figures 5 to 8).	1.0	To be provided if the proposed Project Change is accepted by the ExA
<u>APP-079</u>	ES Appendix 5.3.1: Buildability Report (Part A)	Update Section 8.13 to address the construction of Project Change 3 with respect to foul water.	1.0	To be provided if the proposed Project Change is accepted by the ExA
<u>APP-080</u>	ES Appendix 5.3.1:	Update Section 8.13 to address the construction of	1.0	To be provided if the



	Buildability	Project Change 3 with		proposed
	Report (Part B, Part 1)	respect to foul water; and update Appendix A Gatwick Surface Access Construction Stages Sketches to show the construction access to the reed beds work area.		Project Change is accepted by the ExA
<u>APP-082</u>	ES Appendix 5.3.2: Code of Construction Practice	Update section 4.5 to include the compound for the reed bed area. Update section 5.9.4 to include the 2.4m high temporary noise barrier.	1.0	To be provided if the proposed Project Change is accepted by the ExA
<u>APP-085</u>	ES Appendix 5.3.2: Code of Construction Practice Annex 3 – Outline Construction Traffic Management Plan	Update section 6.2 to show the construction access to the reed beds work area.	1.0	To be provided if the proposed Project Change is accepted by the ExA
<u>APP-078</u>	ES Appendix 5.2.3: Mitigation Route Map	Update mitigation measures that would be adopted as part of Project Change 3 upon which the assessment relies to avoid or reduce significant adverse effects. These mitigation measures comprise those to address odour during operation; noise during construction and operation; and the alternative route for the footpath as referred to in Table 6 above.	1.0	To be provided if the proposed Project Change is accepted by the ExA
<u>APP-088</u>	ES Appendix 5.3.3: Indicative Construction Sequencing	Update anticipated construction timing for the water treatment works from	1.0	To be provided if the proposed Project



		2027 to 2028 in the ES to 2025 to 2026.		Change is accepted by the ExA
<u>APP-106</u>	ES Appendix 7.8.2 Written Scheme of Investigation for Post-consent Archaeological Investigations and Historic Building Recording – West Sussex	Update section 5.4 and paragraph 6.4.1 to cover the extension of the proposed Strip, Map and Sample archaeological investigation into the area of Project Change 3; and update figures 5 and 10 to show the Strip, Map and Sample archaeological investigation proposed for the area of Project Change 3.	1.0	To be provided if the proposed Project Change is accepted by the ExA
APP-113 to APP-116	ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan	 Updates to: Update paragraph 1.1.8 to introduce new Annex 5 and 6 and paragraph 1.2.2 to insert reed bed for water treatment works and refer to mitigation. Update Section 3.9 Zone 8: Eastern Zone to include wetland habitat for reed beds at water treatment works. Update Section 4.9 Zone 8: Eastern Zone to include landscape proposals for reed beds at water treatment works. Update to Section 5 include reed beds at water treatment works. Update Section 6.5 to introduce reed beds. 	1.0	To be provided if the proposed Project Change is accepted by the ExA



		 Update Section 7.2 to include the creation of the reed beds. Update Section 10.9 to expand to include reed beds at water treatment works. Add new Figure 1.2.19: Wastewater Treatment Works Reed Bed Sketch Landscape Proposals. Update Annex 1 to add reed beds at water treatment works to programme. Update Annex 2 to add maintenance of reed beds at water treatment works. Add new Annex 5: Tree Survey and Tree Removal and Protection Plans (this is to include areas outside of the surface access improvements corridor). Add new Annex 6: Arboricultural Impact Assessments (for the whole DCO area). 		
APP-136	ES Appendix 9.9.2: Biodiversity Net Gain Statement	Update section 4 and associated tables to account for changes to habitat creation post development and associated Biodiversity Net Gain calculations; and update Figure 2.1 to account for changes in habitats to be lost taking into account Project Change 3.	1.0	To be provided if the proposed Project Change is accepted by the ExA



<u>APP-215</u>	ES Appendix 19.8.1: Public Rights of Way Management Strategy	Updates Table 3.1.1 to include footpath 360_1Sy; update Table 4.1.1 to include the additional alternative route for footpath 360_1Sy; and add Annex 2 to include plan showing proposed alternative route for footpath 360_1SyT.	1.0	To be provided if the proposed Project Change is accepted by the ExA
<u>APP-257</u>	Design and Access Statement (Volume 5) – Appendix A1	Update to design principles to secure the delivery of acoustic fencing associated with Project Change 3.	1.0	To be provided if the proposed Project Change is accepted by the ExA



6 Combined Environmental Appraisal

- 6.1.1 In addition to undertaking a review of the proposed Project changes individually, the Applicant has undertaken a review to determine if any of the proposed changes, when combined, would result in any new or materially different significant effects beyond those reported in the **ES** [APP-026 to APP-046] submitted as part of the Application.
- 6.1.2 There are not considered to be any new or materially different significant effects for the combined proposed Project Changes 1, 2 and 3 beyond those reported in the ES.



7 Non-Statutory Consultation

7.1. Consultation Activities

- 7.1.1 The Applicant has carried out non-statutory consultation on the proposed changes to ensure that all persons who may be affected by the proposed changes were made aware of the changes and had the opportunity to provide comments in advance of this Change Application.
- 7.1.2 Owing to geographical nature of the proposed changes, the consultation was primarily aimed at prescribed consultees, relevant local authorities and landowners/those with an interest in the land related to the proposed changes under sections 42(a) to (d) of the Planning Act 2008. The Applicant also voluntarily consulted members of the public.
- 7.1.3 The consultation was carried out between 13 December 2023 and 21 January 2024, totalling a period of 40 days to provide an allowance for bank holidays and in response to the ExA's **Procedural Decision** [PD-008] dated 04 December 2023.

7.1.4 The consultation activities comprised:

- The Applicant held a briefing session on the proposed changes with 10no. local authorities before the start of consultation. The session was attended by Crawley Borough Council, West Sussex County Council, Reigate and Banstead Borough Council, Surrey County Council, Mole Valley District Council, Tandridge District Council, Mid Sussex District Council, Horsham District Council, East Sussex County Council and Kent County Council.
- A briefing session was also held with Parish / Town Councils shortly following the start of consultation, attended by Charlwood Parish Council, Horley Town Council and Salfords & Sidlow Parish Council. The meeting slides and notes from this meeting was also shared with GATCOM (the Gatwick Airport Community Group).
- A letter and consultation leaflet was sent to all prescribed consultees, relevant local authorities and landowners/those with an interest in the land related to the proposed changes.
- A consultation leaflet was sent directly to residents and businesses in close proximity to the land subject to the proposed changes.
- The consultation was advertised through national and local news and media outlets, including The Times UK, Surrey Mirror, The London Gazette, Kent and Sussex Courier, The Crawley Observer and County Times.
- A site notice was erected and maintained through the consultation period.



- The consultation material was published on Gatwick Airport's Project website.
- 7.1.5 Further detail on the consultation activities and copy of the consultation material is contained in the **Consultation Report Addendum** (Doc Ref. 9.3).
- 7.2. Consultation Responses
- 7.2.1 A total of 109 responses were received to the consultation.
- 7.2.2 A summary of the issues raised in response to consultation is provided below. A detailed response to each issue is provided in the **Consultation Report Addendum** (Doc Ref. 9.3).

Project Change 1: Extension to the design parameters for the NT IDL proposed southern extension

- Comments expressing support for the proposed change.
- Comments querying how construction waste will be disposed of.
- Comments raising concern that the additional lorry movements generated by the demolition and construction waste have not been considered.
- Comments raising noise, climate change and air quality concerns over increased construction traffic impacting surrounding communities.

Project Change 2: Reduction in height of the proposed replacement CARE facility and change in its purpose

- Comments requesting further information on the traffic impacts of the change and related air quality impacts.
- Comments expressing concern over the additional vehicles needed to remove waste from the airport.
- Comments expressing support for the proposed change, particularly due to improved visual impacts and reduction in air pollution close to residential areas.
- Comments raising the need for a re-assessment of lorry movements to and from the airport, to take account of the transportation of waste.

Project Change 3: Revision to the proposed water treatment works

- Comments expressing support for the proposed change.
- Comments requesting further drainage details on how the reed beds would connect to the wider drainage infrastructure, and impacts on the wider drainage strategy.
- Comments requesting further detail on the effectiveness of the reed bed technology to remove contaminants.



- Comments expressing concern over the cost cutting approach to remove the MBBR system.
- Comments raising concern that the reed beds will not accommodate the surface water generated by the Project.
- 7.2.3 The Applicant has reviewed and considered the consultation feedback, and welcomes the support that has been received for all three of the proposed changes. The Applicant recognises the concerns that have been raised regarding the additional traffic movements arising from Project Change 2 and has provided further information in this report and the accompanying **Consultation Report**Addendum (Doc Ref. 9.3) to clarify the additional movements.
- 7.2.4 The **Consultation Report Addendum** (Doc Ref. 9.3) contains a more detailed description of the consultation feedback and the Applicant's response.

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8 References

Department for Communities and Local Government (March 2015). Planning Act 2008: Guidance for the examination of applications for development consent.

Planning Act 2008.

Planning Inspectorate (March 2023). Advice Note Sixteen: Requests to change applications after they have been accepted for examination (Version 3).

The Infrastructure Planning (Compulsory Acquisition) Regulations 2010.

The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.



Glossary

Term	Description	
ABAGO	Airport Buildings and Ground Operations	
ACL	Airport Coordination Limited	
BOA	Biodiversity Opportunity Area	
CARE	Central Area Recycling Enclosure facility	
CoCP	Code of Construction Practice	
DCO	Development Consent Order	
EIA	Environmental Impact Assessment	
ES	Environmental Statement	
FBA	Forced Bed Aeration	
GAL	Gatwick Airport Limited	
GDP	Gross Domestic Product	
GCN	Great Crested Newt	
GHG	Greenhouse Gas	
HGV	Heavy Goods Vehicle	
IDL	International Departure Lounge	
LOAEL	Lowest Observed Adverse Effect Level	
MBBR	Moving Bed Biofilm Reactor	
NOEL	No Observed Effect Level	
NRP	Northern Runway Project	
NRMM	Non-Road Mobile Machinery	
NSR	Noise Sensitive Receptor	
NT	North Terminal	
OLEMP	Outline Landscape and Ecology Management Plan	
SOAEL	Significant Observed Adverse Effect Level	
WSI	Written Scheme of Investigation	
ZTV	Zone of Theoretical Visibility	