

# Mole Valley District Council – Written Representation - DCO

## Proposed Project Changes

### **1.0 Introduction**

1.1 Mole Valley District Council (MVDC, or ‘the Council’) recognises that the Examining Authority (ExA), has accepted the Applicants (Gatwick Airport Limited (GAL)) proposed project changes to its application for a Development Consent Order (DCO) for the Northern Runway Project (NRP). The Council wishes to submit the following Written Representation (WR) in response to these proposed changes.

#### ***Consultation***

1.2 Chapter 2 of Application document AS-142 states at 2.1.2, that relevant Local Authorities (LAs) were consulted on the proposed changes. However, it is not transparent in specifying that LAs were not notified directly and individually, but via the Gatwick Officer Group, chaired by Crawley Borough Council (CBC), and GATCOM. However, the Council did make comment and acknowledges that the Applicant has registered MVDC’s comments on the proposed project changes consultation (AS-142/3).

1.3 However, there are a number of parishes who have raised concerns that they were not contacted and therefore prevented from commenting. No list of contacted consultees is included within either of the Consultation Responses documents (AS-142/3) and therefore the Council is unable to verify the extent and efficacy of the proposed consultation exercise with any certainty beyond our own experiences which were insufficient.

1.4 The Applicant’s processes in this matter are not considered to accord with good and robust consultation and MVDC would ask the ExA to ensure that the Applicant is held to account when conducting any further exercises.

### **2.0 Project Change 1: Increase to the design parameters for the North Terminal International Departure Lounge proposed southern extension**

2.1 The Council does not consider that this project change will have a material impact on the district and has no comments.

### **3.0 Project Change 2: Reduction in the height and change in the purpose of the replacement CARE facility**

3.1 MVDC welcomes this amendment which should result in the lessening of negative visual and air quality impacts than those originally proposed.

3.2 However, the Council continues to seek clarity on the location of the processing facility which would be utilised for the off-site processing of the organic waste, necessitated by the proposed change. This detail was not provided during the consultation, nor is it provided in the updated AS-133, AS-142, or AS-143.

3.3 Table 5 of AS-142 states that locations had been provided by the Applicant to those parties who had requested them, however, the Council has not received any information on this,

despite this being asked for through its response to the Applicant-led consultation. This information has been withheld for unknown reasons and must be available for the Applicant to be able to assert in Tables 4 and 5 of AS-142 that *“The Change Application Report (Doc Ref. 9.2) [AS-139] confirms the number of additional vehicle trips associated with the proposed change, is expected to be up to six vehicle movements (three arrivals and three departures) a day for the new CARE facility to transport waste off airport”*.

- 3.4 In addition, the Council would expect that, in addition to the location and routing of the additional HGV movements, operating hours would also have been made available and a relevant consideration in any modelling/planning relating to the proposed change. This was not the case and is requested,
- 3.5 While the Applicant considers this to be a non-material change to the status quo and that of the proposed application, it is not possible for parties to comment on any such impacts without understanding the context and location of the off-site facility and the Council is unable to be assured that there will be no impacts for Mole Valley and its communities.

#### **4.0 Project Change 3: Revision to the Water Treatment Works system**

- 4.1 The Council does not consider that this project change will have a material impact on the district and has no comments.

#### **5.0 Conclusion**

- 5.1 MVDC remains unclear on details regarding proposed change 2 which could result in environmental impacts for the District. As such, the Council reserves the right to raise issues regarding transit of organic waste to an off-site facility until the location is known and concerns can be allayed.