

## INTRODUCTION

Airport Industrial Property Unit Trust ('AIPUT') hereby provides a brief Deadline 3 submission relating to the examination of the application made by Gatwick Airport Limited ('GAL') for a development consent order ('the DCO application') for the Gatwick Northern Runway Project ('the Project') under the Planning Act 2008 ('PA 2008').

AIPUT is a limited partner in the Airport Industrial Limited Partnership, the General Partner of which is Airport Industrial GP Limited ('AIGPL'). AIGPL, together with its wholly owned subsidiary Airport Industrial Nominees Limited ('AINL'), own the legal title to the leasehold land and have rights in certain parcels of land to which the DCO application relates (as described in their relevant representation and written representation).

AIPUT, AIGPL and AINL make this Deadline 3 submission as a group under the name 'AIPUT'.

The following Deadline 3 submission, includes:

- AIPUT's comments on the updated documents to reflect Project Changes 1-3 submitted by GAL at Deadline 2; Subheading: Review of GAL's Deadline 2 Submissions

AIPUT has reviewed the updated documents accompanying GAL's Deadline 2 submission and would like to raise the following comments, which relate to the matters set out in AIPUT's formal response 18 January 2024 to GAL's Winter Consultation in January 2024 on the Project Changes.

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

AIPUT previously noted the changes to the Indicative Construction Sequencing (ES Appendix 5.3.3 [APP-088]). AIPUT reiterate their previous comment, that despite the removal of the two proposed biomass boilers and the associated flue of up to 48 metres, for an overall reduction in the maximum height of the main facility building, the footprint of the replacement facility building is unchanged from the DCO Application. Therefore, AIPUT query the rationale for changing the CARE facility construction phase(s) and request further information on the intensity of construction over the continuous phase of work as well any changes to logistical requirements (increases in HGV movements, workforce numbers, workforce travel, etc.).

AIPUT notes that details on the access into the CARE Facility have been provided in 5.6.12 (Access) of Design and Access Statement Vol. 3 (Version 2). However, AIPUT previously requested that in relation to the CARE Facility (which no longer proposes the incineration of waste), off airport processing sites, travel routes, and the frequency of trips anticipated are provided by GAL and considered within the relevant transport assessments, so as to demonstrate that the CARE facility proposals will not have a detrimental effect on the Airport Road network. No information on routeing or the number of anticipated trips has been provided to date.

It is noted that Design and Access Statement Vol. 1 (Version 2.0) submitted in light of the Project Changes on 28th March 2024, states that Option 1 for the CARE Facility was favoured due to 'shorter journey times for rubbish vehicles', amongst other benefits. Design and Access Statement Vol. 3 (Version 2) states, "Waste material would continue to be taken off-airport to a dedicated waste processing centre(s) and not be processed on the airport". AIPUT would again request that the airport processing sites, travel routes, and the frequency of trips are made clear by GAL within their proposals and impacts properly assessed.

Subheading: Change 3: Revision to the proposed water treatment works

AIPUT previously noted that the indicative construction sequencing in the DCO Application (ES Appendix 5.3.3 [APP-088]) for the proposed water treatment works were amended from 2027 to 2028 and are now proposed to be constructed between 2025 and 2026.

GAL states in the Notification of Proposed Changes (Application Document Ref: 9.1) that there would be approximately one to two more HGV movements per hour in the 3-month construction period for the water treatment works compared to the construction HGV movements assessed in the DCO Application "being up to 220 movements". AIPUT previously raised that the numerical comparison is not written clearly though the addition appears to be a high proportion of the base; clarity was requested and is still required.

AIPUT also noted that the Transport Assessment (Tracked) - Version 2 submitted alongside the Notification of Proposed Changes does not consider additional HGV movements arising from Change 3 and no updated version of the Outline Construction Traffic Management Plan (ES Appendix 5.3.2 Annex 3) or Outline Construction Workforce Travel Plan (ES Appendix 5.3.2 Annex 2) have been submitted to consider the scale and impacts of the additional movements. AIPUT would query as to how the Applicant has determined that the additional movements would not generate new significant effects on severance, driver delay, pedestrian and cyclist delay and amenity, accidents and safety, hazardous loads, or effects on public transport amenity (as stated in paragraph 3.1.11 in Doc. Ref 9.1).

Despite the updated suite of documents submitted by the Applicant on 28 March 2024 to reflect the Proposed Project Changes, the requested documents stated above were not updated. AIPUT requests that HGV movements relating to Project Change 3 are considered within an updated Transport Assessment, updated Outline Construction Traffic Management Plan and Outline Construction Workforce Travel Plan.