

The Planning Inspectorate  
National Infrastructure Applications Team  
Temple Quay House  
Temple Quay  
Bristol  
BS1 6PN

FAO: Kevin Gleeson (Lead Member of the Examining Authority)

15 May 2024

Dear Mr Gleeson,

**Application for a Development Consent Order by Gatwick Airport Limited for the Gatwick Airport Northern Runway Project (Ref. TR020005) – Deadline 4 Submission**

As set out in its Rule 8 letter [[PD-011](#)], the Examining Authority (ExA) has requested the following information of relevance to the Applicant to be submitted at Deadline 4:

- Post-hearing submissions, including written summaries of oral submissions to the Hearings held during w/c 29 April 2024;
- Comments on responses to ExQ1;
- Comments on Written Representations submitted by Deadline 3;
- Updated Navigation Document;
- Any further information requested by the ExA under Rule 17 of the Infrastructure Planning (Examination Procedure) Rules 2010; and
- Comments on any further information/submissions received by Deadline 3.

The following sets out the information the Applicant has supplied for this Deadline 4 in relation to each of the above requests.

**Post-hearing submissions**

The Applicant has submitted the following post-hearing submissions, including responses to the ExA's Action Points [[EV12-009](#), [EV13-009](#) and [ENV14-005](#)]:

- **Written Summary of Oral Submissions ISH6: Climate Change (including Greenhouse Gases)** (Doc Ref 10.25.1)
- **Written Summary of Oral Submissions ISH7: Other Environmental Matters** (Doc Ref 10.25.2)
- **Written Summary of Oral Submissions CAH1: Compulsory Acquisition** (Doc Ref 10.25.3)
- **The Applicant's Response to Matters Raised at Open Floor Hearing 3** (Doc Ref. 10.26.1)

- **The Applicant's Response to Actions ISH6: Climate Change (including Greenhouse Gases)** (Doc Ref. 10.26.2)
- **The Applicant's Response to Actions ISH7: Other Environmental Matters** (Doc Ref. 10.26.3)
- **The Applicant's Response to Actions CAH1: Compulsory Acquisition** (Doc Ref. 10.26.4)

The Applicant notes the ExA's request for the s106 Explanatory Memorandum (EM) to be submitted at Deadline 5 however the Applicant considers that the s106 EM will be most complete and useful to the ExA and Interested Parties (IP) if read alongside the latest version of the draft DCO s106 Agreement. Discussions with the Joint Local Authorities (JLAs) on the draft DCO s106 Agreement are progressing and the content and scope of the agreement are evolving as the parties agree the appropriate obligations, drafting and securing mechanisms.

The next version of the draft DCO s106 Agreement has been requested for submission at Deadline 6 in the Rule 8 Letter [PD-011] and the Applicant therefore proposes to submit the s106 EM at Deadline 6 alongside the latest version of the s106 Agreement. The Applicant confirms that the DCO s106 EM will include the information requested by the ExA in Action Points 19 and 20.

### **Comments on Deadline 3 Submissions**

The Applicant has submitted the **Response to Deadline 3 Submissions** (Doc Ref. 10.24) which responds to the submissions made by IPs at Deadline 3.

### **Comments on responses to ExQ1**

The Applicant has reviewed all responses received at Deadline 3 in response to ExQ1. Where it has further comments to make in response to an IP's submission beyond its original response, the Applicant has provided its response at Section 2 of the **Response to Deadline 3 Submissions** (Doc Ref. 10.24).

A set of Preliminary Vegetation Removal and Protection Plans were due to be submitted at Deadline 4 to form an appendix to the Outline Arboricultural and Vegetation Method Statement (ES Appendix 5.3.2 – Annex 6), however these are being revised in response to comments received at Deadline 3. These plans will now be submitted at Deadline 5 following discussions with the JLAs.

### **Comments on Written Representations submitted by Deadline 3**

The Applicant has reviewed and provided responses to the Written Representations made on Project Changes 1 to 3 within the document titled **The Applicant's Response to Written Representations on Project Changes 1-3** (Doc Ref. 10.23).

### **Navigation Document**

The Applicant has submitted an updated version of the **Navigation Document** (Doc Ref. 1.3 v11) as part of the submission.

### **Any further information requested by the ExA under Rules 9 and 17**

The ExA issued a Procedural Decision and a Request for Further Information under Rules 9 and 17 on 8 April 2024 [PD-013], requesting responses by Deadline 3. Such information requested included additional information in respect of the Car Park Strategy (R17a.3), to which the Applicant noted (as part of its response at Deadline 3) that additional time would be required to provide a comprehensive answer to this question.

The Applicant has provided the requested car parking information at this Deadline within the **Response to Rule 17 Letter – Car Parking** (Doc Ref. 10.21). The Applicant has also provided a response to the residual matters raised at Deadline 2 by the JLAs and Holiday Extras within the Appendix to the **Response to Rule 17 Letter – Car Parking** (Doc Ref. 10.21) .

The ExA issued a further Procedural Decision and a Request for Further Information under Rule 17 on 9 May 2024 [PD-018]. The requests directed to the Applicant are set out at R17b.1(b), (c), (d) and R17b.2. The Applicant's response is set out below:

#### **R17b.1 (b), (c), (d) - Future Baseline**

- (b) The Applicant will report at Deadline 5 on the sensitivity analysis requested by the ExA as described in paragraphs 3.1.1- 3.1.6 of **Appendix A: Response to York Aviation – Forecasts** (Doc Ref. 10.24).
- (c) A response to the ExA's request in relation to the ability to achieve peak spreading when there is very limited capacity for new peak season slots is contained at paragraph 2.3.12 of **Appendix A: Response to York Aviation – Forecasts** (Doc Ref. 10.24).
- (d) A response to the ExA's request in relation to the risk of double counting is contained within paragraphs 2.1.6 - 2.1.11 of **Appendix A: Response to York Aviation – Forecasts** (Doc Ref. 10.24).

#### **R17b.2 – Waste Management Assessment**

The Applicant will submit a note at Deadline 5 which provides further detail in relation to this and the points within the Rule 17 letter.

In addition to those submissions requested by the ExA in the Rule 8 Letter, the Applicant has prepared new or updated application documents to address feedback from the ExA or IPs, or that it considers to be helpful to the Examination. These are explained below.

### **ES Addendum – Updated Central Case Aircraft Fleet Report**

The Applicant commissioned further forecasting and noise assessment work during Summer 2023 to review the evolving commercial situation post-Covid 19 and to provide for a contemporaneous view of the degree to which fleet transition might progress in the next few years. That work was expected to show fleet transition within the range assessed by the Central Case fleet and Slow Fleet Transition (SFT) case assessment cases. Noise contours for the updated forecasts were available late in 2023. The updated forecasts were then subject to further analysis in early 2024.



This forecasting and analysis work has subsequently been used to produce an “Updated Central Case” forecast which is considered in **ES Addendum – Updated Central Case Aircraft Fleet Report** (Doc Ref. 5.1).

This Updated Central Case is now considered by the Applicant to represent the most likely rate of fleet transition. Whilst this is the case, it is nonetheless still the case that the SFT case remains valid, and in the Applicant's view continues to reasonably represent the potential for global and market events to further slow the rate of fleet transition. Accordingly, it remains the case that the Updated Central Case and the SFT case in combination present the 'worst case scenario' for all ES topics, and the basis on which they do so is explained in this ES Addendum.

Section 2 of the ES Addendum explains the basis of the new Updated Central Case forecast. Any implications for the noise assessment within the submitted ES Chapter are addressed in Section 3 with all other environmental topics being considered in Section 4.

### **Other Documents**

In addition to those documents requested by the ExA in the Rule 8 Letter the Applicant is submitting a number of updated application documents and additional documents which it considers would assist the ExA and IPs in their consideration of the application. These revisions and additional documents have arisen from discussions with stakeholders as part of the Statements of Common Ground or in response to feedback to previous Deadline submissions:

- **ES Appendix 14.9.10 Noise Insulation Scheme** (Doc Ref. 5.3 v2)
- **ES Appendix 5.3.2: Code of Construction Practice** (Doc Ref. 5.3 v3)
- **ES Appendix 5.3.2: CoCP Annex 5 – Construction Resources and Waste Management Plan** (Doc Ref. 5.3 v2)
- **ES Appendix 5.3.2: CoCP Annex 8 – Outline Invasive and Non-Native Species Management Strategy** (Doc Ref. 5.3)
- **ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan** (Doc Ref. 5.3 v4)
- **Supporting Greenhouse Gas Technical Notes** (Doc Ref. 10.22)
- **Supporting Climate Change Technical Notes to Statements of Common Ground** (Doc Ref. 10.28)
- **Zone of Theoretical Visibility of the Temporary Construction Compounds** (Doc Ref. 10.29)
- **Note on Acquisition of Special Category Land and Provision of Replacement Land** (Doc Ref. 10.30)

### **Errata**

During the preparation of the two greenhouse gas related technical notes, the Applicant identified a discrepancy within the values at Table 16.9.11 of **ES Chapter 16: Greenhouse Gases** [APP-041]. This error has been corrected and **ES Chapter 16: Greenhouse Gases** (Doc Ref. 5.1 v2) resubmitted at this deadline. The values referenced within the conclusion beneath the table remain correct and there is no impact on the overall conclusions within the chapter.

**Submission of Updated and Additional Documents**

The table below sets out the updated application documents and additional documents submitted as part of Deadline 4 for ease of reference, including the reason for submission.

<b>Updated or New Document</b>	<b>Document Title</b>	<b>Reference</b>	<b>Reason for Submission</b>
Updated	Navigation Document (clean and tracked versions)	Doc Ref. 1.3 v11	As requested in the Rule 8 Letter and includes the updated and additional documents submitted by the Applicant at this Deadline.
New	ES Addendum - Updated Central Case Aircraft Fleet Report	Doc Ref. 5.1	To explain the further forecasting and noise assessment work commissioned in summer 2023 which formed the Updated Central Case forecast and is now the core case for Fleet Transition.
Updated	ES Chapter 16: Greenhouse Gases (clean and tracked versions)	Doc Ref. 5.1 v2	To correct errata identified at Table 16.9.11.
Updated	ES Appendix 14.9.10 Noise Insulation Scheme (clean and tracked versions)	Doc Ref. 5.3 v2	To address comments from the ExA and IPs and reflect the detail provided in <b>ES Appendix 14.9.10 Noise Insulation Scheme Update Note [REP2-031]</b> submitted at Deadline 2.
Updated	ES Appendix: 5.3.2: Code of Construction Practice (clean and tracked versions)	Doc Ref. 5.3 v3	To address comments from IPs through the SoCGs and updated to reflect new and updated Annexes to the CoCP submitted at this Deadline and previous Deadlines.
Updated	ES Appendix 5.3.2: CoCP Annex 5 – Construction Resources and	Doc Ref. 5.3 v2	To address comments from the JLAs in the



	Waste Management Plan (clean and tracked versions)		SoCGs on the Brick Clay Resource Consultation Area and the monitoring of construction waste management.
New	ES Appendix 5.3.2: CoCP Annex 8 – Outline Invasive and Non-Native Species Management Strategy	Doc Ref. 5.3	Requested by the JLAs’ Local Impact Report and in SoCGs.
Updated	ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan (Parts 1-3) (clean and tracked versions) <b>Please note:</b> no changes were made to Part 3 of the OLEMP and therefore no tracked change version of Part 3 has been submitted.	Doc Ref. 5.3 v4	To address comments from the JLAs in the SoCGs relating to GAL’s existing Biodiversity Areas.
New	Response to Rule 17 Letter – Car Parking	Doc Ref. 10.21	In response to the ExA’s request under Rule 17 and to respond to points made by the JLAs and Holiday Extras at Deadline 2.
New	Supporting Greenhouse Gas Technical Notes	Doc Ref. 10.22	Response to stakeholder comments in the LIRs.
New	The Applicant’s Response to Written Representations on Project Changes 1-3	Doc Ref. 10.23	As requested in the Rule 8 Letter.
New	The Applicant’s Response to Deadline 3 Submissions	Doc Ref. 10.24	Requested by the ExA as requested in the Rule 8 letter.
New	Appendix A – Response to York Aviation – Forecasts	Doc Ref. 10.24	Forms part of the Applicant’s response to the Deadline 3 Submissions as requested by the ExA in the Rule 8 Letter.
New	Appendix B - Response to York Aviation - Capacity and Operations	Doc Ref. 10.24	Forms part of the Applicant’s response to the Deadline 3 Submissions as



			requested by the ExA in the Rule 8 Letter.
New	Appendix C - Response to CAGNE's Deadline 3 Submission	Doc Ref. 10.24	Forms part of the Applicant's response to the Deadline 3 Submissions as requested by the ExA in the Rule 8 Letter.
New	Appendix D - Response to Heathrow's Deadline 3 Submission	Doc Ref. 10.24	Forms part of the Applicant's response to the Deadline 3 Submissions as requested by the ExA in the Rule 8 Letter.
New	Appendix E - Response to SCC's Airfield Drainage Queries	Doc Ref.10.24	Forms part of the Applicant's response to the Deadline 3 Submissions as requested by the ExA in the Rule 8 Letter.
New	Appendix E - Response to SCC's Airfield Drainage Queries - Annex A – Figures	Doc Ref. 10.24	Forms part of the Applicant's response to the Deadline 3 Submissions as requested by the ExA in the Rule 8 Letter.
New	Appendix F - Response to JLAs on Arboriculture, Landscape and Ecology	Doc Ref. 10.24	Forms part of the Applicant's response to the Deadline 3 Submissions as requested by the ExA in the Rule 8 Letter.
New	Appendix G - Response to Ben Benatt's Deadline 3 Submission	Doc Ref. 10.24	Forms part of the Applicant's response to the Deadline 3 Submissions as requested by the ExA in the Rule 8 Letter.
New	Appendix H – Note on Excepted Development and the Airport Development Principle	Doc Ref. 10.24	Forms part of the Applicant's response to the Deadline 3 Submissions as requested by the ExA in the Rule 8 Letter.



New	Written Summary of Oral Submissions ISH6: Climate Change (including Greenhouse Gases)	Doc Ref. 10.25.1	As requested in the Rule 8 Letter.
New	Written Summary of Oral Submissions ISH7: Other Environmental Matters	Doc Ref. 10.25.2	As requested in the Rule 8 Letter.
New	Written Summary of Oral Submissions CAH1: Compulsory Acquisition	Doc Ref. 10.25.3	As requested in the Rule 8 Letter.
New	The Applicant's Response to Matters Raised at Open Floor Hearing 3	Doc Ref. 10.26.1	As requested in the Rule 8 Letter.
New	The Applicant's Response to Actions ISH6: Climate Change (including Greenhouse Gases)	Doc Ref. 10.26.2	As requested in the Rule 8 Letter.
New	The Applicant's Response to Actions ISH7: Other Environmental Matters	Doc Ref. 10.26.3	As requested in the Rule 8 Letter.
New	The Applicant's Response to Actions CAH1: Compulsory Acquisition	Doc Ref. 10.26.4	As requested in the Rule 8 Letter.
New	Supporting Climate Change Technical Notes to the Statements of Common Ground	Doc Ref. 10.28	To support JLA SoCG responses.
New	Zone of Theoretical Visibility of the Temporary Construction Compounds	Doc Ref. 10.29	To respond to a request in the JLAs SoCGs.
New	Note on Acquisition of Special Category Land and Provision of Replacement Land	Doc Ref. 10.30	To respond to points raised by JLAs at CAH1.

If the Applicant can be of any further assistance or the ExA considers any further clarification is required in response to the information and documentation submitted as part of this submission, please do not hesitate to contact the Applicant using the details already provided.

Yours sincerely,





LONDON GATWICK

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