

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

FAO: Kevin Gleeson (Lead Member of the Examining Authority)  
6 June 2024

Dear Mr Gleeson,

**Application for a Development Consent Order by Gatwick Airport Limited for the Gatwick Airport Northern Runway Project (Ref. TR020005) – Deadline 5 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 5:

- Progressed Statements of Common Ground (SoCG);
- Progressed Statement of Commonality for SoCGs;
- Updated Book of Reference (BoR) and Schedule of Changes to the BoR;
- Updated Land Rights Tracker;
- 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 4.

The following sets out the information the Applicant has supplied for this Deadline 5 in relation to each of the above requests.

**Progressed Statements of Common Ground (SoCGs) and Statement of Commonality**

The Applicant has provided progressed SoCGs with Interested Parties (IPs) as set out in the table at the end of this letter. These SoCGs remain draft work in progress and will continue to be progressed throughout the Examination with finalised SoCGs being submitted when they have been signed by both parties and in any event by Deadline 9.

The two SoCGs with York Aviation (on behalf of the Joint Local Authorities) on Forecasting and Need (Doc Ref. 10.1.19) and Capacity and Operations (Doc Ref. 10.1.18) have not been submitted at this deadline due to ongoing work and discussions on the future baseline sensitivity analysis, the outcomes of which may supersede the commentary currently within the SoCGs. The Applicant is actively engaging with York Aviation and anticipates submitting SoCGs at a future deadline.

The Applicant has also been seeking to progress discussions with the JLAs on the issues relating to sections 104 and 105 of the 2008 Act and had provided to them a draft position paper as a basis for a joint document to be submitted at this deadline. It has been informed this evening that the JLAs will be making a submission to the examination instead. The Applicant will review and discuss any submission with the JLAs so as to allow for a response, hopefully in agreement with the JLAs, at Deadline 6.

All SoCGs have been shared with the relevant IP prior to submission as part of this deadline.

The **Statement of Commonality** (Doc Ref. 10.1 v3) has been updated to reflect the overarching status of matters by topic.

#### **Updated Book of Reference and Schedule of Changes**

The Applicant has produced and submitted an updated version of the **Book of Reference** (Doc Ref. 3.3 v4) accompanied by a **Schedule of Changes** (Doc Ref. 3.3 v3).

#### **Land Rights Tracker**

The Applicant has enclosed an updated version of the **Land Rights Tracker** (Doc Ref. 8.6 v3) to reflect the most recent position. It is accompanied by a Schedule of Changes

#### **Navigation Document**

The Applicant has submitted an updated version of the **Navigation Document** (Doc Ref. 1.3 v12) as part of the submission.

#### **Any further information requested by the ExA under Rule 17**

The ExA issued a Procedural Decision and a Request for Further Information under Rule 17 on 9 May 2024 [[PD-018](#)] in relation to the future baseline and waste management. The below sets out the Applicant's response.

##### **R17b.1 - Future Baseline**

The ExA asked in the Rule 17 letter, for the Joint Local Authorities (JLAs) to propose alternative forecasts to be used as a sensitivity analysis. These forecasts (prepared by York Aviation) were submitted by the JLAs at Deadline 4 [[REP4-049](#)], with two scenarios proposed for further study – the York Low and the York High Cases. These represent a difference (between the future baseline and with project scenarios) of 18.0 mppa and 19.7 mppa respectively (compared with a difference of 13.0 mppa in GAL's equivalent forecasts in the submitted DCO Application).

While the Applicant does not consider the York High and Low cases to be plausible for the reasons explained in its response, it has carried out the sensitivity analysis using York's figures on a without prejudice basis. The Applicant has also proposed a further sensitivity test using what it believes to be more credible (albeit still unlikely) assumptions; however, the Applicant stands by its forecasts as presented within the DCO Application, and this further sensitivity is also presented on a without prejudice basis.

The Applicant's **Response to Rule 17 – Future Baseline Sensitivity Analysis** (Doc Ref. 10.40):

- Discusses the forecasts provided by York Aviation and how they differ from the Application's DCO forecasts (Section 3);
- Introduces the Applicant's proposed sensitivity test (Section 4); and
- Presents the environmental review for the topics which may be affected by the revised forecast assumptions (Section 5).

The high-level outcome, if any of the scenarios was to be given weight, is that the increased delta between the future baseline and NRP forecasts (by comparison to the equivalent DCO application forecasts) equates to a demonstrably greater need for the NRP with correlative increased benefits; however, the incremental impacts of the NRP may also be greater.

The potential for those greater incremental impacts to have new or different significant effects to those reported in the ES is considered in section 5 of the response, but in summary, the assessment finds that differences between the scenarios are relatively limited and the assumptions which inform the forecasts are such that materially different environmental outcomes to those reported in the Application assessment are unlikely.

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

The Rule 17 letter also requested that the Applicant demonstrate compliance with Schedule 4 Paragraph 5(c) of the EIA Regulations and to confirm whether there are any other waste arisings that should have a type and quantity listed in the ES project description in order to meet the EIA Regulations.

The Applicant has submitted the **Response to Rule 17 Letter - Waste Management Assessment** (Doc Ref. 10.35) which addresses the points under R17b.2 within the Rule 17 letter.

#### **Comments on Deadline 4 Submissions**

The Applicant has submitted the **Response to Deadline 4 Submissions** (Doc Ref. 10.38) which responds, where considered necessary and/or helpful, to the submissions made by IPs at Deadline 4. The response document is supported by Appendices A to H, including the Applicant's **Response to the JLAs' Environmentally Managed Growth Framework Proposition** at Appendix B.

Due to the volume of submissions received and the effort required to undertake the future baseline sensitivity analysis, not all submissions have been fully responded to (e.g. air quality and ecology) at this deadline. The Applicant has noted throughout the report where any matters have been deferred and will respond to those outstanding matters at Deadline 6.

## 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:

- **Draft DCO** (Doc Ref. 2.1 v7);
- **Draft DCO Schedule of Changes** (Doc Ref. 2.1 v3)
- **Explanatory Memorandum to the Draft DCO** (Doc Ref. 2.2 v5);
- **Land Plans – For Approval** (Doc Ref. 4.2 v3);
- **Schedule of Changes to Land Plans – For Approval** (Doc Ref. 4.2);
- **Parameter Plans – For Approval** (Doc Ref. 4.7 v3);
- **Surface Access Highways Plans – Engineering Section Drawings – For Approval** (Doc Ref. 4.8.2 v2)
- **ES Appendix 5.3.2: CoCP Annex 3 – Outline Construction Traffic Management Plan** (Doc Ref. 5.3 v2)
- **ES Appendix 5.3.2: CoCP Annex 9 – Construction Dust Management Strategy** (Doc Ref. 5.3)
- **ES Appendix 11.9.1: Geomorphology Assessment** (Doc Ref. 5.3 v2);
- **ES Appendix 11.9.3 Water Quality HEWRAT Assessment** (Doc Ref. 5.3 v2);
- **ES Appendix 11.9.6: Flood Risk Assessment – Annexes 3-6** (Doc Ref. 5.3 v2);
- **ES Appendix 14.9.7 The Noise Envelope** (Doc Ref. 5.3 v2);
- **Design and Access Statement – Appendix 1 – Design Principles** (Doc Ref. 7.3 v4);
- **Outline Reptile Mitigation Strategy** (Doc Ref. 10.31);
- **Environmental Appraisal of the Impact of the Post-Covid 19 Traffic Data for the Environmental Statement** (Doc Ref. 10.32);
- **Supporting Ecology Technical Notes** (Doc Ref. 10.33);
- **Summary of Airline Support** (Doc Ref. 10.36); and
- **Holiday Inn Noise Report** (Doc Ref. 10.41).

## Errata

The latest version of the **Works Plans** [REP3-011] submitted at Deadline 3 is missing Sheets 4 and 6 (as no amendments to these sheets were required). A complete version of the **Works Plans** (Doc Ref. 4.5 v5) has been submitted at this Deadline 5.

**Submission of Updated and Additional Documents**

The table below sets out the updated application documents and additional documents submitted as part of Deadline 5 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 v12	As requested in the Rule 8 Letter and includes the updated and additional documents submitted by the Applicant at this Deadline.
Updated	Draft Development Consent Order (clean and tracked versions)	Doc Ref. 2.1 v7	Updated to incorporate (i) specific separate requirements for Level 2 Control Documents, as explained in response to DCO.1.47 and DCO.1.48 in the <b>Applicant's Response to ExQ1 – DCO and Control Documents</b> <a href="#">[REP3-089]</a> , (ii) the Applicant's amended approach to what was previously termed 'excepted development', as explained in its <b>Note on Excepted Development and the Airport Development Principle</b> <a href="#">[REP4-030]</a> and (iii) additional amendments and additions in response to comments from the Joint Local Authorities, National Highways and other interested parties at recent deadlines.
Updated	Draft Development Consent Order – Schedule of Changes	Doc Ref. 2.1 v3	Updated to show the changes in the dDCO between versions 6 and 7.
Updated	Explanatory Memorandum to the Draft Development Consent	Doc Ref. 2.2 v5	Updated to reflect the changes made to version



	Order (clean and tracked versions)		7 of the dDCO submitted at Deadline 5.
Updated	Book of Reference (Part 1 and Parts 2) (clean and tracked versions)	Doc Ref. 3.3. v4	As requested in the Rule 8 Letter.
Updated	Book of Reference – Schedule of Changes	Doc Ref. 3.3 v3	As requested in the Rule 8 Letter.
Updated	Land Plans – For Approval	Doc Ref. 4.2 v3	Updated to reflect changes to plots in response to comments from National Highways.
New	Land Plans – For Approval – Schedule of Changes	Doc Ref. 4.2	To explain the updates made to the Land Plans submitted at Deadline 5.
Updated	Works Plans (clean and tracked versions)	Doc Ref. 4.5 v5	To correct errata, in that Sheets 4 and 6 were missing from Version 4 submitted at Deadline 3.
Updated	Parameter Plans – For Approval	Doc Ref. 4.7 v3	Updated to align with the (new) Schedule 13 – Informative Maximum Parameter Heights in Schedule in the dDCO (Doc Ref. 2.1 v7); and in response to engagement with National Highways (NH) regarding the Limits of Deviation for the surface access works (set out in NH’s response to ExQ1 DCO.1.19).
Updated	Surface Access Highways Plans – Engineering Section Drawings – For Approval	Doc Ref. 4.8.2 v2	Updated in response to engagement with NH’s regarding the vertical Limits of Deviation for the surface access works (set out in NH’s response to ExQ1 DCO.1.19).
Updated	ES Appendix 5.3.2: CoCP Annex 3 - Outline Construction Traffic Management Plan (clean and tracked versions)	Doc Ref. 5.3 v2	Updated in response to comments from National Highways, Royal Mail and the Joint West Sussex



			Authorities submitted at Deadline 4.
New	ES Appendix 5.3.2: CoCP Annex 9: Construction Dust Management Strategy	Doc Ref. 5.3	To respond to a request in the JLA's LIR.
Updated	ES Appendix 11.9.1 Geomorphology Assessment (clean and tracked versions)	Doc Ref. 5.3 v2	To respond to a request in the National Highways SoCG.
Updated	ES Appendix 11.9.3 Water Quality HEWRAT Assessment (clean and tracked versions)	Doc Ref. 5.3 v2	To respond to a request in the National Highways SoCG.
Updated	ES Appendix 11.9.6 Flood Risk Assessment – Annexes 3-6 (clean and tracked versions)	Doc Ref. 5.3 v2	To respond to a request in the National Highways SoCG.
Updated	ES Appendix 14.9.7 The Noise Envelope (clean and tracked versions)	Doc Ref 5.3 v2	To include further detail regarding monitoring compliance and the role of the CAA.
Updated	Design and Access Statement - Appendix 1 - Design Principles (clean and tracked versions)	Doc Ref. 7.3 v4	Updated in response to comments received from IPs.
Updated	Land Rights Tracker	Doc Ref. 8.6 v3	As requested in the Rule 8 Letter.
Updated	Land Rights Tracker – Appendix A – Schedule of Changes	Doc Ref. 8.6 v2	To reflect updates made to the Land Rights Tracker.
Updated	Statement of Commonality (clean and tracked versions)	Doc Ref. 10.1 v3	As requested in the Rule 8 Letter.
Updated	Statement of Common Ground between Gatwick Airport Limited and Crawley Borough Council (clean and tracked versions)	Doc Ref. 10.1.1 v2	As requested in the Rule 8 Letter.
Updated	Statement of Common Ground between Gatwick Airport Limited and East Sussex County Council (clean and tracked versions)	Doc Ref. 10.1.2 v2	As requested in the Rule 8 Letter.
Updated	Statement of Common Ground between Gatwick Airport Limited and Horsham District Council (clean and tracked versions)	Doc Ref. 10.1.3 v2	As requested in the Rule 8 Letter.



Updated	Statement of Common Ground between Gatwick Airport Limited and Kent County Council (clean and tracked versions)	Doc Ref. 10.1.4 v2	As requested in the Rule 8 Letter.
Updated	Statement of Common Ground between Gatwick Airport Limited and Mid Sussex District Council (clean and tracked versions)	Doc Ref. 10.1.5 v2	As requested in the Rule 8 Letter.
Updated	Statement of Common Ground between Gatwick Airport Limited and Mole Valley District Council (clean and tracked versions)	Doc Ref. 10.1.6 v2	As requested in the Rule 8 Letter.
Updated	Statement of Common Ground between Gatwick Airport Limited and Reigate and Banstead Borough Council (clean and tracked versions)	Doc Ref. 10.1.7 v2	As requested in the Rule 8 Letter.
Updated	Statement of Common Ground between Gatwick Airport Limited and Surrey County Council (clean and tracked versions)	Doc Ref. 10.1.8 v2	As requested in the Rule 8 Letter.
Updated	Statement of Common Ground between Gatwick Airport Limited and Tandridge District Council (clean and tracked versions)	Doc Ref. 10.1.9 v2	As requested in the Rule 8 Letter.
Updated	Statement of Common Ground between Gatwick Airport Limited and West Sussex County Council (clean and tracked versions)	Doc Ref. 10.1.10 v2	As requested in the Rule 8 Letter.
Updated	Statement of Common Ground between Gatwick Airport Limited and Environment Agency (clean and tracked versions)	Doc Ref. 10.1.12 v2	As requested in the Rule 8 Letter.
Updated	Statement of Common Ground between Gatwick Airport Limited and National Highways (clean and tracked versions)	Doc Ref. 10.1.14 v2	As requested in the Rule 8 Letter.
Updated	Statement of Common Ground between Gatwick Airport Limited and Natural England (clean and tracked versions)	Doc Ref. 10.1.15 v2	As requested in the Rule 8 Letter.





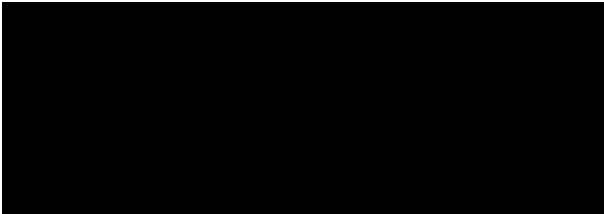
New	Statement of Common Ground between Gatwick Airport Limited and Network Rail	Doc Ref. 10.1.16	As requested in the Rule 8 Letter.
Updated	Statement of Common Ground between Gatwick Airport Limited and Thames Water (clean and tracked versions)	Doc Ref. 10.1.17 v2	As requested in the Rule 8 Letter.
New	Statement of Common Ground between Gatwick Airport Limited and NATS (En Route) Plc	Doc Ref. 10.1.20	As requested in the Rule 8 Letter.
New	Outline Reptile Mitigation Strategy	Doc Ref. 10.31	To respond to comments raised by the JLAs at Deadline 3.
New	Environmental Appraisal of the Impact of the Post-Covid 19 Traffic Data for the Environmental Statement	Doc Ref. 10.32	As requested in the Procedural Decision issued on 24 October 2024 <a href="#">[PD-006]</a> .
New	Supporting Ecology Technical Notes	Doc Ref. 10.33	To address comments from the JLAs in the SoCGs.
New	Response to Rule 17 Letter - Waste Management Assessment	Doc Ref. 10.35	As requested in the Procedural Decision issued on 9 May 2024 <a href="#">[PD-018]</a> .
New	Summary of Airline Support	Doc Ref. 10.36	To respond to York Aviation's submissions at Deadline 3.
New	The Applicant's Response to Deadline 4 Submissions	Doc Ref. 10.38	As requested in the Rule 8 Letter.
New	Appendix A - Response to West Sussex Joint Local Authorities - Air Quality	Doc Ref. 10.38	Forms part of the Applicant's Response to the Deadline 4 Submissions as requested in the Rule 8 Letter.
New	Appendix B - Response to the JLAs' Environmentally Managed Growth Framework Proposition	Doc Ref. 10.38	Forms part of the Applicant's Response to the Deadline 4 Submissions as requested in the Rule 8 Letter.



New	Appendix C - Response to Comments on the oCTMP at Deadline 4	Doc Ref. 10.38	Forms part of the Applicant's Response to the Deadline 4 Submissions as requested in the Rule 8 Letter.
New	Appendix D - Response to Heathrow Airport's Deadline 4 Submission	Doc Ref. 10.38	Forms part of the Applicant's Response to the Deadline 4 Submissions as requested in the Rule 8 Letter.
New	Appendix E - Response to York Aviation's Deadline 4 Submission	Doc Ref. 10.38	Forms part of the Applicant's Response to the Deadline 4 Submissions as requested in the Rule 8 Letter.
New	Appendix F - Note on Pentagon Field	Doc Ref. 10.38	Forms part of the Applicant's Response to the Deadline 4 Submissions as requested in the Rule 8 Letter.
New	Appendix G - Response to the JLAs' Comments at Deadline 4 on Noise and Vibration Technical Notes	Doc Ref. 10.38	Forms part of the Applicant's Response to the Deadline 4 Submissions as requested in the Rule 8 Letter.
New	Appendix H – Response to CAGNE's Deadline 4 Submission – Issue Specific Hearing 6 Post-Hearing Submission	Doc Ref. 10.38	Forms part of the Applicant's Response to the Deadline 4 Submissions as requested in the Rule 8 Letter.
New	Response to Rule 17 Letter - Future Baseline Sensitivity Analysis	Doc Ref. 10.40	As requested in the Procedural Decision issued on 9 May 2024 [ <a href="#">PD-018</a> ].
New	Holiday Inn Noise Report	Doc Ref. 10.41	To respond to Marathon Asset Management's comments submitted at Deadline 1 [ <a href="#">REP1-221</a> ].

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,



**Jonathan Deegan**  
**NRP Programme Lead**  
**Gatwick Airport Limited**