



Gatwick Airport Northern Runway Project

The Applicant's Response to Actions
ISH 8: Draft Development Consent Order

Book 10

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1 Introduction

1.1.1 This document provides the Applicant's response to the actions arising from Issue Specific Hearing (ISH) 8 in relation to Agenda Item 8: the draft Development Consent Order (DCO). The actions relevant to the Applicant are as follows:

Action No.	Action	Deadline
23	Discussion about outstanding issues relating to descriptions of Works Numbers.	Deadline 7
24	Provide general view of whether the dDCO would benefit from the level of detail in the latest available dDCO available for the Luton Airport NSIP.	Deadline 6
25 ¹	Respond to JLAs concern about Works 39 and more generally the JLA comments on [REP3- 135]	Deadline 6
26	JLAs to comment on whether a schedule of parameters should be provided and what detail should it have.	Deadline 6
27	Response on Odour Management and Monitoring Plan [REP1-069].	Deadline 6

1.1.2 The below sections provide the Applicant's response. For actions which require a more detailed response, a reference to the appropriate document is included.

2 Action Point 24

2.1.1 **The Examining Authority has asked the Applicant to provide a general view of whether the dDCO would benefit from the level of detail in the latest**

¹ The Applicant notes that two action points were numbered '24' on the ExA's published list. The Applicant has therefore renumbered the last three action points for the purpose of this document.

available dDCO available for the Luton Airport NSIP. The following response is provided.

- 2.1.2 The Applicant has had regard to the draft DCO for the London Luton Airport Expansion project, as well as other precedent DCOs, in the preparation of its **draft DCO** (Doc Ref. 2.1). However, the Applicant emphasises that each project is different and the approach taken for one project may not be necessary or useful in the context of another project.
- 2.1.3 The Applicant considers that the current level of detail in Schedule 1 to the draft DCO strikes the appropriate balance between specifying the works for which development consent is granted and preserving a degree of flexibility to reflect that the Project's detailed design is not yet finalised and will be refined post-consent, within the bounds of the articles and requirements of the DCO and the control documents.
- 2.1.4 The Applicant notes that the JLAs have limited remaining outstanding comments on the wording of the works descriptions in Schedule 1, as confirmed at ISH 8. In this context, the Applicant does not consider that further wide-ranging or significant changes to Schedule 1 are required or justified. Where comments do remain outstanding, the Applicant and the JLAs are in discussions to determine how best to resolve these. In some instances the Applicant will include details currently included in the **Design Principles** (Doc Ref. 7.3) (and therefore secured through requirements 4 – 6 of the draft DCO) in the works descriptions, to provide further specificity. For other works, the Applicant considers that the JLAs' concern is broader than the drafting in Schedule 1 and is better addressed through the Applicant's secured mitigation. For example, the Applicant does not consider it necessary to specify numbers of car parking spaces for each proposed car park as it considers that overall car parking provision will be managed in order to ensure compliance with the Applicant's mode share commitments in the **Surface Access Commitments** (Doc Ref. 5.3) and the overall size and placement of these works will be controlled by the **Works Plans** (Doc Ref. 4.5) and **Parameter Plans** (Doc Ref. 4.7) through article 6 (limits of works) of the draft DCO.
- 2.1.5 The Applicant understands that the JLAs' concerns are now focussed more on the level of detail in the **Works Plans** (Doc Ref. 4.5) when read in conjunction with Schedule 1 of the draft DCO and the Applicant is working with the JLAs to provide further information and, to the extent necessary and possible, revise the Works Plans.

3 Action Point 25

- 3.1.1 **The Examining Authority has asked the Applicant to respond to JLAs concern about Works 39 and more generally the JLA comments on [REP3-135]. The following response is provided.**
- 3.1.2 The Applicant notes that the JLAs' comments in [\[REP3-135\]](#) were responding to ExQ1 and were drafted without sight of the Applicant's responses to those questions which were also submitted at Deadline 3 in [\[REP3-089\]](#). Therefore, the Applicant considers that the JLAs' comments have either been addressed in the Applicant's responses to ExQ1 or have been superseded by the JLAs' latest position on Schedule 1 as relayed at ISH 8. As above, where concerns remain regarding the level of detail on the **Works Plans** (Doc Ref. 4.5) when read in conjunction with Schedule 1 of the draft DCO, these are being addressed through bilateral discussions with the JLAs, which are ongoing.
- 3.1.3 In relation to the JLAs' specific comment on Work No. 39 (works associated with the River Mole), the Applicant adds the following by way of additional explanation:
- 3.1.4 The repositioning of the northern runway 12 metres northwards and the resulting necessary revisions to the airfield layout (such as changes to Taxiway Juliet) require the infilling of Pond A and the extension of the existing culvert and syphon that convey the watercourse beneath both runways. The extended channel is covered to prevent vehicles from entering it and includes riparian planting, and at its outlet a fish resting pool to facilitate fish movement through the structure.
- 3.1.5 The River Mole will be realigned and renaturalised downstream of the runway culvert. This would improve channel sinuosity and variations in the channel form and features would improve natural geomorphological processes, allowing the channel to act more naturally. The features will include areas of gravels to speed up flow and areas of deeper pools to provide slower water, generating variable depths and water speeds and therefore changes to sediment transport and the size of sediment deposited/transported. As a result there will be reduced likelihood of over-siltation and stagnation of the river system. The other additional benefit is that these features improve the overall aquatic environment both in-channel and along the margins by providing natural bed sediment in-channel for invertebrates and fish, whilst marginal features create lots of areas for invertebrates, fish resting refuges and macrophytic plant life. Combined, these

make the river more resilient to drought and flood and more responsive (geomorphologically and ecologically) to any changes that may occur as a result.

- 3.1.6 The drainage of surface water from the Pond A catchment is still required with the Project. As the existing pond would be removed this is replaced by pumping runoff to the adjacent Pond M catchment.

4 Action Point 27

- 4.1.1 **The Examining Authority has asked the Applicant to provide a response on Odour Management and Monitoring Plan [REP1-069]. The following response is provided.**

- 4.1.2 In the Local Impact Report [[REP1-069](#)] at Reference 56 the JLAs identified a request for an additional requirement to provide an Odour Management and Monitoring Plan (OMMP) to ensure the management of aviation fuel odour and other odour emissions. They suggested that the OMMP should be based on best practice and include:

- Procedures for recording, reviewing monitoring results and adjusting mitigation.
- Data sharing and reporting with LPA.
- Complaints and resolution process
- Communications and Engagement Plan sharing with local authorities.
- Proposed odour mitigation measures

- 4.1.3 The Applicant has responded to this in the **Relevant Representations Report** [[REP1-048](#)] and more specifically in the **The Applicant's Response to the Local Impact Reports** [[REP3-078](#)].

- 4.1.4 At Table 4.3.1 of its Relevant Representations Report [[REP1-048](#)] the Applicant confirmed that the odour assessment in **ES Chapter 13: Air Quality** [[REP3-018](#)] concluded that the impact of the Proposed Development on odour is considered to be not significant. The Applicant used a multi-tool approach to determine the conclusion rather than relying on number of complaints which provides a more robust assessment

- 4.1.5 In their Relevant Representation [[RR-0556](#)], Communities Against Gatwick Noise Emissions (CAGNE) raised specific concerns about odour in relation to the proposed incinerator at the CARE facility (paragraph 9.5). Project Change 2 to the DCO which was accepted by the ExA was to remove the boilers from the

replacement CARE facility and instead repurpose the replacement facility to be a waste sorting facility only.

4.1.6 Through responses the Applicant has confirmed that the following measures will be taken in relation to odour management:

- The **Code of Construction Practice** [[REP4-007](#)] (CoCP) must be complied with in carrying out any construction activities as part of the authorised development (DCO Requirement 7) and paragraphs 5.8.3 to 5.8.5 of the CoCP set out odour management procedures which are secured.
- Compliance with legislation and guidance that apply to an operational airport including that about the handling of fuels and waste.
- An extended monitoring network onsite and in the local area is secured through Schedule 1 of the **draft DCO s106 Agreement** (Doc Ref. 10.11). This will be highly beneficial for understanding the changes in emissions across the airport. The data will give the airport additional information on the activities and emissions occurring onsite which can, where necessary, feedback into operational management
- An Air Quality Action Plan (AQAP) will be submitted to the local authorities every five years under Schedule 1 of the **draft DCO s106 Agreement**. A draft AQAP is included as Appendix 5 to the **draft DCO s106 Agreement** and this includes the Applicant's reporting on odour related complaints. This will also be discussed at the air quality meetings with the local authorities which are secured through Schedule 1 of the **draft DCO s106 Agreement**.

4.1.7 In the context of these measures and that the air quality assessment concluded that there would be no significant odour impacts as a result of the Project, an OMMP is not required for the Project.

4.1.8 The Applicant is drafting a Proposed Odour Reporting Process document to clarify any remaining questions around odour. The Applicant will share this document with local authorities for comment with the objective of submitting the document at Deadline 7.