



Gatwick Airport Northern Runway Project

Response to the Examining Authority's Written Questions
(ExQ2) – General and Cross-Topic

Book 10

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1 Response to the Examining Authority’s Written Questions – General and Cross-Topic

1.1.1 The below table sets out the Applicant’s response to the Examining Authority’s Written Questions relating to General and Cross-Topic.

ExQ1 Question to: Question:		
GENERAL AND CROSS-TOPIC		
GEN.2.1	Applicant	<p>Second runway to the south</p> <p>Your answer to ExQ1 GEN.1.5 states that the release of safeguarded land [for the potential second runway to the south of the Airport] would be contrary to Government Policy as set out in the Aviation Policy Framework (APF) 2013 (para 5.8 and 5.9), Aviation 2050 Dec 2018 (para 3.66) and the National Planning Policy Framework (NPPF) 2023 (para 110).</p> <p>Paras 5.8 and 5.9 of the APF states that land that may be required for airport development in the future should be protected until Government has established relevant policies and proposals in response to the findings of the Airports Commission (2015). This could be considered to have been established by the publication of the Airports National Policy Statement (ANPS). Para 3.66 of Aviation 2050 refers to the NPPF seeking to protect where there is robust evidence, sites, and routes.</p> <p>Given the publication of the ANPS in June 2018 and the proposals within the Northern Runway Project (NRP) for development up to 2047, is there still a need to safeguard land for a second runway to the south of the Airport?</p> <p>In short, the answer is ‘yes, in the national interest’, and land continues to be safeguarded for an additional, wide spaced runway through the Local Plan process, in line with national aviation policy.</p>

The HM Government publication *Aviation 2050 – The future of UK aviation (Cm9714)* published in December 2018 post-dates the publication of the Airports National Policy Statement (June 2018) and confirms at para 3.66 that *“It is prudent to continue with a safeguarding policy to maintain a supply of land for future national requirements and to ensure that inappropriate developments do not hinder sustainable aviation growth.”* Para 3.66 then explains that the National Planning Policy Framework (NPPF) has restated the government’s commitment to *“identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice”* and that the Government believes that this provides sufficient guidance for local authorities to consider the future needs of airports and their associated surface access requirements, when developing local plans.

Whilst that text dates from December 2018, it is notable that a new north west runway has not yet been brought forward at Heathrow and that the 2024 NPPF maintains the same statement of national policy (at paragraph 110), with the policy explaining that its purpose includes: *“...to widen transport choice and realise opportunities for large scale development”*.

The Crawley Borough Council Local Plan (2024 – 2040) was submitted to the Secretary of State for examination in July 2023 and a series of examination hearings took place in November 2023 and January 2024, including a number of sessions relating to Gatwick Airport and the safeguarded land.

Whilst it is not necessary to go into all of the detail that was presented at the Local Plan examination in terms of the need for the safeguarding of land at Gatwick, on 31st January 2024, the Local Plan Inspectors published a Post Hearings Advice Note ([ID-026 Post Hearings Letter 31 Jan 2024.pdf \(crawley.gov.uk\)](#)) containing a section relating to Gatwick Airport. Paragraph 9 onwards refers to Gatwick and the safeguarded land and states:

“9. Overall, we find the Plan’s general approach to Gatwick Airport to be sound, albeit matters of detail will need to be addressed. On the fundamental issue of the need to safeguard land to deliver an additional wide-spaced runway, we consider the combination of the 2019 Airport Masterplan and the ongoing process of

		<p><i>clarifying the need for additional runway capacity in the southeast as instigated through the 2018 draft Aviation Strategy ‘Aviation 2050: The Future of UK Aviation’ (which postdates the Airports National Policy Statement (June 2018)) to meet a minimum threshold for the ‘robust evidence’ required by NPPF paragraph 106 c) for safeguarding. We address the extent of safeguarded land below, but we are satisfied at a strategic level that the submitted plan strikes an appropriate balance between safeguarding land that would be critical for an expanded Gatwick Airport and the ability to accommodate much needed employment land in the wider public interest.</i></p> <p><i>10. If ongoing processes on national aviation policy do not reach a positive conclusion that additional wide-spaced runway provision at Gatwick Airport is needed, then we agree with the Borough Council that this would trigger a plan review. This is recognised at paragraph 1.36 of the submitted plan. Accordingly, we do not consider it necessary for soundness to include a specific plan review policy....</i></p> <p><i>13. Overall, at this stage of the examination, we find that the submitted plan retains safeguarding to land, which in our view, would be “critical” to implementing a second wide spaced runway and associated development and infrastructure if a need for expanded runway capacity in the south-east were to be established through ongoing processes.”</i></p> <p>GAL’s continued view, and as also expressed in the Gatwick Airport Masterplan (July 2019) which was published after the Airports National Policy Statement, is that it remains prudent, and in the national interest, to continue to safeguard land at Gatwick for an independent full length southern runway. That position is unaffected by the Northern Runway Project.</p>
Design & Access Statement		
GEN.2.2	Applicant	<p>Para 5.10.11.6 of the Design and Access Statement (DAS) Volume 4 [REP2-035] appears unfinished and the Figure reference in para 5.10.11.7 seems to be incorrect.</p> <p>Please provide an updated version.</p>

		<p>The Design and Access Statement (Volume 4) (Doc Ref. 7.3) has been submitted at Deadline 7 with the following updates made:</p> <ul style="list-style-type: none"> ▪ Para 5.10.11.6 has been revised to include reference to an infill panel strategy, to complete the paragraph. ▪ Para 5.10.11.7 has been revised to reference Figure 30, being the correct reference.
GEN.2.3	Applicant	<p>Bullet point one of para 6.12.2.5, DAS Volume 5 [REP2-036] appears incorrect.</p> <p>Please provide an updated version.</p>
		<p>The Design and Access Statement (Volume 5) (Doc Ref. 7.3 v5) has been submitted at Deadline 7 to correct text in bullet point one of para 6.12.2.5.</p>
GEN.2.4	Applicant	<p>Deck parking in the DAS Volume 5 [REP2-036] is described as generally being constructed in an open, galvanised, painted metal frame with no external cladding. However, some of the proposed deck parking would occupy what could be considered sensitive locations, close to the Airport boundaries and within other constraints.</p> <p>Would such utilitarian designs be appropriate in such places?</p>
		<p>Design Principle DBF43 (previously DBF8) of the Design Principles (Doc Ref. 7.3 v5) has updated and submitted at Deadline 7 to remove the statement ‘no external cladding’ on decked car parking. Design Principle DBF43 has also been amended to include an additional requirement for the detailed design of decked car parking to consider the need for additional or enhanced cladding based on contextual analysis.</p> <p>Paragraph 6.12.4.6 of the Design and Access Statement (Volume 5) (Doc Ref. 7.3 v3) has been amended to reflect the content of the updated Design Principles (Doc Ref. 7.3 v5), as described above.</p>

GEN.2.5	Applicant	<p>Volume 5 of the DAS [REP2-036] assumes in section 9.1 that construction will start in 2024. While the text notes that this is indicative, consider this dateline and provide an updated version of the DAS (and Figure 71) showing realistic timelines for development given the programme for the consideration of this application.</p> <p>The Applicant has updated the time periods in Section 9.1 of the DAS (Volume 5) (Doc Ref. 7.3 v3) to reflect an indicative construction start date of 2025, to correspond with an assumed DCO decision date of February 2025.</p> <p>The works set out in ES Appendix 5.3.3: Indicative Construction Sequencing [REP2-016] as being carried out in 2024 have been carried forward into 2025 (e.g. the demolition of the former TCR Snowbase building (Work No. 8(g)) and the demolition and replacement of the motor transport facilities (Work Nos. 8(b) and 10) and grounds maintenance facilities (Work Nos. 8(c) and 11)). The indicative construction programme was based on a start date of November 2024 and therefore a delay of up to 3 months (i.e. to February 2025) is not time critical to these works and does not have a resulting knock-on impact on the remainder of the Indicative Construction Sequencing and Section 9.1 of the DAS (Volume 5) (Doc Ref. 7.3 v3), most notably on the 2029 opening year for dual runway operations and the end date of construction.</p>
GEN.2.6	Applicant	<p>Built form Project Wide Design Principle BF1 [REP5-031] states that all new buildings will be designed and constructed to achieve Net Zero emissions during operation.</p> <p>Should this be widened to consider environmental impacts during construction?</p> <p>The Design Principles (Doc Ref. 7.3 v5) relate to the detailed design of the final, permanent Project. Specifically, the Project-wide Design Principle BF1 relates to the detailed design of all new buildings to be constructed and operational as part of the permanent Project.</p> <p>Carbon emissions arising from construction of the Project are controlled through ES Appendix 5.4.2: Carbon Action Plan (CAP) [APP-091], specifically the construction carbon budget figure committed to within the CAP, secured under Requirement 21 of the Draft DCO (Doc Ref. 2.1 v9). The Construction Carbon Management</p>

		<p>Strategy [REP3-107] sets out how GAL will deliver on its construction carbon commitments and ensure that all construction and supply chain partners are fully aware of the commitments and that they will be expected to play their part.</p> <p>Construction management systems and measures to be in place during the construction of the Project, including those to manage and minimise environmental impacts, are covered in ES Appendix 5.3.2: Code of Construction Practice (Doc Ref. 5.3) and its Annexes [APP-082 – APP-087], secured under Requirements 7, 12-13 and 27-30 of the Draft DCO (Doc Ref. 2.1 v9).</p> <p>The Applicant considers these measures to provide the appropriate consideration / control of construction impacts arising during the construction of the authorised development and that it would not be helpful to duplicate the same in the Design Principles (Doc Ref. 7.3 v5), which are proposed to provide separate, distinct, control / safeguards in respect of the design of the Project.</p>
GEN.2.7	Applicant	<p>Various Design Principles [REP5-031], including BF3, N1, N2, RW1, LA1, LA3, LA5, LA8, LA9, LA10, DBF22, DDP4, DDP5, DDP19, DLP1, DLP2, DLP3, DLP4, DBF8, DBF9, DLP11, DLP13, DLP14, DLP15, DLP16, and DLP176 use phrasing including the word ‘should’.</p> <p>In the interests of certainty and precision should this be altered to more definite wording, such as ‘shall’ or ‘will’? If so, please provide an updated version.</p> <p>In response to ExQ2 GEN.2.7, the Applicant has amended the requested Design Principles (Doc Ref. 7.3 v5) in Version 5.0 submitted at Deadline 7 to amend the wording “should” to either “shall” or “will”. The exceptions being for Design Principles DBF8, DBF9, DBF22, DLP11, DLP13, DLP14 and DLP16 as these do not include the word “should”. In some cases, the Applicant believes that the ExA may have intended to refer to Design Principles LA7, DBF27, DLP9, DLP10, DLP12, DLP18 and DLP19 instead and these have been amended accordingly.</p>

		<p>Please note that in response to the Legal Partnership Authorities’ comments on the Design Principles [REP5-031] (para 2.3), the Applicant has re-ordered the Detailed Built Form (‘DBF’) Design Principles to correspond to the sequencing of the Work Nos. As a consequence, the numbering of all of the DBF Design Principles have changed in Version 5.0 submitted at Deadline 7.</p>
GEN.2.8	Applicant	<p>The National Infrastructure Commission published new guidance on developing and implementing design principles for major infrastructure projects on 21 May 2024.</p> <p>Explain how the DAS and Design Principles Annex A accords with this guidance or make changes if required.</p> <p>The Applicant's Response to the ExA's Written Questions [REP3-091] GEN.1.20 detailed how the Design and Access Statement (Doc Ref. 7.3 v3) aligned with the National Infrastructure Commissions ‘Design Principles for National Infrastructure’¹, which is centred on the four key topics of climate, people, places and value.</p> <p>The new guidance (‘handbook’) published in May 2024 by the National Infrastructure Commission on ‘Project Level Design Principles’² (para 7) sets out what a project’s design principles should achieve, comprising a list of seven bullet points. Below is an explanation of how the DAS and Design Principles (Doc Ref. 7.3 v5) align with those seven points. Importantly, the NIC guidance (para 4) states that <i>“It is important to avoid becoming ‘locked in’ to a solution too early in the process, as this can lead to sub-optimal decision making and poorer value for money”</i>. GAL’s approach to the production of the DAS (Volumes 1 to 5) (Doc Ref. 7.3 v3) and the Design Principles (Doc Ref. 7.3 v5) follows this guidance, by allowing design development in the form, layout and selected materials as part of the detailed design stage of the Project’s work components.</p> <p><i>Bullet 1 – reflect the overarching design vision and address the agreed project requirements, benefits and outcomes.</i></p>

¹ <https://nic.org.uk/studies-reports/design-principles-for-national-infrastructure/>

² <https://nic.org.uk/app/uploads/NIC-Design-Principles-Handbook-Digital-PDF.pdf>

	<p>Section 3.1 of the DAS (Volume 1) (Doc Ref. 7.3 v3) sets out the Project Vision, Objectives and the Needs case for the project. The Project’s vision and objectives have been updated at Deadline 7 to make it clear that good design is firmly part of the Project’s vision.</p> <p><i>Bullet 2 – firmly anchor the proposal, supporting a design narrative that’s relevant to the local context</i> Section 6.2.6 of the DAS (Volume 5) (Doc Ref. 7.3 v3) sets out the National Design Guide’s ‘10 Characteristics of a well designed place’ as the overarching guidance, which includes consideration of the ‘identity’ and ‘context’ of the Project.</p> <p><i>Bullet 3 – recognise place including landscape, the natural environment, Culture and heritage</i> Section 2.0 of the DAS (Volume 1) (Doc Ref. 7.3 v3) includes an assessment of the landscape character of the site (Section 2.6), the historic environment (Section 2.9) and the history of Gatwick Airport (Section 2.2).</p> <p><i>Bullet 4 – be informed by the people affected, including residents, community groups, infrastructure users, interest groups, and local employers</i> The pre-application public consultations are detailed in Section 4.3 of the DAS (Volume 1) (Doc Ref. 7.3 v3) and which explains how the consultation, which invited feedback from the public, has impacted the design of the Project.</p> <p><i>Bullet 5 – reflect an inclusive approach to ensure equitable delivery of benefits and prevention from harm</i> The Design Principles (Doc Ref. 7.3 v5) ensure that accessibility for all is embedded in the detailed design process, with design requirements on accessibility contained in a number of Project-wide and site-specific Design Principles (e.g. LA3, DBF8, DBF29, DBF34, DBF36, DBF38, DBF41 and DLP1). The design guidance in the DAS (Volume 5) (Doc Ref. 7.3 v5) for each typology (Section 6.12) also details guidance on where accessibility, health and well being should be considered and which has informed the Design Principles. Outside of the DCO controls, the Project must also be compliant with the Disability Discrimination Act 1995 and the UK building regulations which contain accessibility design requirements.</p>
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		<p><i>Bullet 6 – demonstrate that opportunities have been identified to deliver wider benefits and outcomes beyond the project, utilising systems thinking</i></p> <p>Section 3.2 of the DAS (Volume 1) (Doc Ref. 7.3 v3) summarises the needs case for the Project, forming a key part of the Project’s benefits. Separately, the Design Principles (Doc Ref. 7.3) includes requirements to consider a range of interlinked and holistic considerations that the detailed design process would need to address such as the landscape, noise, resources and waste.</p> <p><i>Bullet 7 – be clearly written, with quantifiable measures, so that final outcomes can be tested against them.</i></p> <p>The Design Principles (Doc Ref. 7.3 v5) are written in clear language and include measurable outcomes where relevant to the nature of the works.</p>
GEN.2.9	Applicant NATS (En route)	<p>WIZAD</p> <p>Section 4.4 of the ‘<i>Applicant’s Response to Deadline 5 Submissions – Response to York Aviation</i>’ [REP6-091] concerns the implications for WIZAD of growth. The Applicant’s position with regards to Airspace Change and the FASI-S process is noted; however, section 4.4 states that the use of WIZAD will increase in the baseline case and with the Proposed Development, due to congestion of the London Terminal Control Area airspace. This suggests that the increased use of WIZAD is directly linked to expansion at the Airport (in either baseline or NRP).</p> <p>a) The Statement of Common Ground (SoCG) between the Applicant and NATS (En route) Limited (NERL) [REP5-066] states that Gatwick Airport Limited (GAL) and NERL are co-sponsoring the London Airspace South (LAS) airspace deployment which can be put into operation earlier than Future Airspace Strategy Implementation South (FASI-S). Do the LAS proposals have any impact on the usage or potential for usage of WIZAD?</p> <p>b) Confirm (or otherwise) that the increased use of WIZAD caused by the Proposed Development would not require an airspace change.</p>

- c) Given the statement that WIZAD usage would increase in the baseline case and with the proposed development due to congestion in the London Terminal Control Area airspace, would the implementation of FASI-S allow for WIZAD usage to decrease or cease?
- d) Would the baseline case result in a greater use of WIZAD than the proposed development – and if so, why?

Context

The assumption relating to congestion of the London Terminal Control Area airspace is based on anticipated demand for airspace sectors to the north of London Gatwick, rather than specifically relating to only London Gatwick traffic. Sectors are 3-D portions of airspace normally managed by a single air traffic controller through which multiple routes will pass, and along which aircraft will route from any number of airports. The airspace sectors to the north of London Gatwick must necessarily accommodate traffic from the main London airports. NATS En Route Ltd has systems and procedures in place to manage that demand, however, the airspace is becoming increasingly congested.

Airspace is a state asset and responsibility, hence the Government’s co-sponsored programme to modernise the airspace in the UK, including the Future Airspace Strategy Implementation - South (FASI-S) airspace change programme. The outcomes of this programme will be determined separately through the airspace change process, which must take into account the requirements of the Air Navigation Guidance 2017 in relation to the assessment of noise impact.

a) There are no changes as part of London Airspace South (LAS) that would have any impact on the usage or potential for usage of the WIZAD Standard Instrument Departure (SID) route.

The Future Airspace Strategy Implementation - South (FASI-S) airspace change programme involves a complete review of the entire airspace system and route structure in the south of the UK, including London Gatwick. This is the context for the LAS airspace change to the south of the airport which is sequenced to be the first implementation of the FASI-S airspace change in the London Terminal airspace.

		<p>The extent of the change that results from FASI-S is not possible to determine at this stage, and it is a matter that will be considered as part of the assessment of FASI-S airspace change proposals. In relation to usage, the LAS proposals do not specifically determine usage. The focus of the project is on route design and the design of the supporting airspace structure. Demand to fly particular routes is driven by flight destination (which itself is driven by consumer demand) which is managed through the flight planning system. WIZAD is not a flight plannable route.</p> <p>Numerous options that follow a similar track to that of the WIZAD SID are likely to be considered through a full options appraisal that forms part of the airspace change process. That is a separate process that will be subject to its own assessment. However, the ‘WIZAD like’ departure route options have been identified as not being suitable for early deployment through LAS and so fall outside of the scope of that project.</p> <p>b) The potential increase in the traffic using the WIZAD SID in connection with the Project, above the future baseline and assessed in the ES, would <u>not</u> require an airspace change.</p> <p>A ‘Level 1’ airspace change is defined as a change that could alter air traffic patterns below 7,000 ft over an inhabited area. This includes departure and arrival routes at airports. No changes in the design of any of the London Gatwick’s flight routes, including WIZAD, are required as a result of the Proposed Development.</p> <p>A change in the distribution of traffic using, in this case, an existing departure route may be classified as an airspace change under the Planned and Permanent Redistribution of air traffic (PPR) provisions of the Civil Aviation Authority (Air Navigation) Directions 2023. Under these provisions a Type 2 change is defined as ‘A PPR which is anticipated to increase air transport movements using a Standard Instrument Departure (SID) by at least 5000 movements per year as a result of a decision by an airport and/or its ANSP to redistribute air traffic from one SID to another at that same airport.’</p> <p>The Directions go on to say, however, that ‘A PPR shall not be considered as a Type 2 PPR solely due to an increase in the number of air transport movements on a SID which is a direct result of changing weather</p>
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		<p>patterns, or airline operations, natural growth, or as a result of agreed (i.e. through the planning system) air transport capacity enhancements at the airport.’</p> <p>The assumed increase in the usage of WIZAD is a reasonable worst-case scenario to assess environmental impacts of the Project, by reference to the future baseline as is appropriate, and it is <u>not required</u> to achieve the airfield throughput capacity generated under the Proposed Development, i.e it is not the result of ‘a decision by an airport and/or its ANSP to redistribute air traffic from one SID to another...’. Note that the WIZAD SID is not a flight plannable route and would continue to be operated in accordance with the current published protocols as set out in the UK Aeronautical Information Publication. GAL has no plans to amend the protocols associated with the use of the WIZAD SID as a tactical offload route.</p> <p>c) FASI-S implementation would void the worst-case assumption on the use of the WIZAD SID.</p> <p>It is reasonable to assume that the successful implementation of FASI-S in the London Terminal airspace would reduce airspace congestion. One of the objectives of the airspace modernisation programme is to create capacity through more efficient airspace design, especially in the southeast of the UK (CAP 1711 paragraph 2.28). Implementation of FASI-S would void the worst-case assumption on the use of the WIZAD SID.</p> <p>Although it is too early in Gatwick’s FASI-S airspace change process to provide a definitive response, it is the view of the Applicant that it is plausible that a ‘WIZAD like’ SID will continue to be used when there is adverse weather to the north of the airport to allow aircraft to continue to safely depart from the airport. Note, 49 aircraft used the WIZAD SID to avoid adverse weather conditions north of the airport in 2023, this safety feature is likely to remain.</p> <p>d) The baseline case would <u>not</u> result in greater use of the WIZAD SID than the Proposed Development.</p> <p>The worst-case assumption applies a small but proportional increase to the usage of WIZAD in the ‘with the’ Proposed Development case versus the future baseline. It is not likely that the future baseline case would</p>
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		result in a greater use of WIZAD than with the Proposed Development, because the Proposed Development is an expansion of the airport and that would see a resultant increase in air traffic in the region.
GEN.2.10	Applicant	<p>Design Principles Annex A [REP5-031]</p> <p>a) Action Point 12 of the 'Applicant's Response to Actions – ISH 8: Good Design' [REP6-086] states that a CV for the proposed Design Advisor is attached as Appendix A. However, there is no appendix appended – please submit one.</p> <p>b) Should the Design Advisor need to be replaced (for whatever reason), what would be the replacement process for such an Advisor? What qualifications would they require and would there be an opportunity for Local Authority input into the procedure?</p>
		<p>a) The CV for the proposed Design Advisor was excluded from the submission in error. The Applicant has subsequently submitted a corrected version of The Applicant's Response to Actions – ISH 8 – Good Design [REP6-080] which contains the CV at Appendix A.</p> <p>b) Should GAL need to find another Design Advisor, then it would search for an appropriate individual with the necessary qualifications, expertise and experience of undertaking design reviews. GAL would look for some form of design qualification or membership of a professional body (e.g. RIBA) and experience of participating in design reviews / panels, preferably with some knowledge of transport infrastructure. This is the process which GAL followed in arriving at the proposed candidate for the Design Advisor and it is anticipated the equivalent exercise would be repeated should it be necessary in the future. Once identified, GAL would be willing to share details (CV) of the individual with Crawley Borough Council.</p>
GEN.2.11	Applicant Interested Parties (IPs)	<p>Environmental Statement</p> <p>At Issue Specific Hearing (ISH) 8 the ExA asked the Applicant to provide, at D9, a consolidated Environmental Statement (ES) incorporating all the various amendments to the ES throughout the Examination. In response</p>

	<p>the Applicant indicated that it would provide a signposting schedule document which would identify the relevant chapters and other aspects of the ES submitted as part of the DCO Application, and where any aspect of the ES as submitted needed to be read subject to other documents that had been submitted during the Examination [REP6-083].</p> <p>The ExA notes that the updated navigational document which is provided at each deadline [REP6-002] provides information in relation to updates and ES Addendums that have been submitted including Appendices to the ES but that ES Chapters themselves are not necessarily updated (eg Appendix 14.9.7: The Noise Envelope was updated at D5 [REP5-029] by ES Chapter 14 [APP-039] has not been revised to incorporate this or any other changes).</p> <p>The ExA requires the ES to remain up to date throughout the Examination to ensure that all parties are provided an opportunity to comment on any information which updates and therefore becomes part of the ES. The Applicant is requested to consider whether all relevant chapters, appendices and figures of the ES are up to date and to provide the ExA with a complete list of changes at D7. Interested Parties (IPs) are then requested to provide comments on any of these updates to the ES at D8.</p> <p>At Issue Specific Hearing 8, the Applicant confirmed that it would provide a sign-posting document at Deadline 9 which identifies the relevant chapters and other aspects of the ES submitted as part of the DCO Application, and then identifies where any aspect of the ES as submitted needed to be read subject to other documents that had been submitted during the examination. This signposting "consolidated ES" document will be a certified document under article 52 (certification of documents, etc.) and Schedule 14 (documents to be certified) to the draft DCO to ensure clarity on what documents constitute the 'Environmental Statement' for future ease of reference (see paragraph 3.2.1 of The Applicant's Written Summary of Oral Submissions ISH 8: Draft Development Consent Order [REP6-083]).</p> <p>The Applicant considers that the ES has been kept up to date during the course of the Examination. This has been achieved through a combination of correcting errata identified during the course of the examination,</p>
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		<p>providing additional clarification information in response to written questions/submissions and/or updates to relevant underlying information where necessary. The signposting document will capture all of this information and explain how it interfaces with the original chapter for completeness. The Applicant is unclear whether it is being suggested that it should amend the text of each ES chapter or appendix to reflect any updates that have been provided, but respectfully considers that this is not necessary or practicable. The ES has been kept up-to-date as the examination has progressed and all parties have been able to comment on additional information as it has been submitted. The signposting document will confirm transparently exactly how any updates have taken place. These will include the addendum that has already been submitted as a separate document. The Applicant will also confirm (and identify accordingly in the signposting document) where revisions to any control document relating to the ES require full updated versions. In recognition however of the desire to ensure that all parties are clear about how the signposting will operate the Applicant will submit the draft at Deadline 8, not Deadline 9, to allow all parties and the ExA sufficient time to comment.</p>
GEN.2.12	Applicant	<p>Planning History</p> <p>The Crawley Borough Council (CBC) Principal Areas of Disagreement Summary Statement (PADSS) [REP5-085] states that the Applicant has undertaken to review the planning history but that no response to CBC’s detailed submissions on the matter have been provided.</p> <p>The Applicant is asked to respond to CBC’s concerns and to paragraphs 4.1-4.18 of the Joint West Sussex Local Impact Report (LIR) [REP1-068].</p> <p>The Applicant reviewed Appendix A (Doc Ref. 7.1 v2) of the Planning Statement in response to CBC’s comment and submitted an updated version at Deadline 7.</p> <p>Appendix A sets out planning applications determined within or near the Order Limits since 2015, together with the 1979 planning permission for the Northern Runway as this is considered pertinent to the DCO application. Appendix A does not contain smaller applications that are not considered to be relevant to the Project.</p>

		<p>Separate to this, the Applicant submitted a response to the ExA’s Procedural Decision, Response to PD-007 – Cover Letter and information on regarding controls over the existing use of the airport [AS-115] issued on 1 December 2023 setting out the existing controls over the airport’s use.</p>
GEN.2.13	Applicant	<p>Future Baseline - Hotel Provision</p> <p>The Applicant’s response to GEN.1.24 [REP3-091] states <i>“the Future Baseline is based upon developments that are currently consented or under construction and would proceed in the absence of the Project. There are no hotel or office developments on-airport that meet this criteria and therefore are not included in the Future Baseline.</i></p> <p><i>It is likely that further hotels will be required as the airport passenger numbers grow in the baseline and these could be provided on or off-site and applications will be made by the Applicant or the market as appropriate.”</i></p> <p>Explain:</p> <p>If hotel capacity will be required to accommodate future baseline growth in passenger numbers and no planning consent exists for such an increase is this not a practical constraint on the ability of the airport to accommodate any theoretical increased passenger growth represented by the future baseline position?</p> <p>The Indicative Construction Sequencing [REP2-016] shows that all the proposed hotels will be constructed in advance of the opening of the dual runway. Is this a further indication that the airport in either scenario needs additional hotel accommodation to satisfy demand in any significant passenger growth?</p>
		<p>Further hotel capacity is likely to be needed. The issue is whether this is provided on or off-site. The Applicant has sought to maintain a broad balance of provision (ie maintaining the share that is met on-airport) and allow the market to provide more capacity off-airport. If there is an increase in demand from passengers, the market signal that sends will encourage further capacity to be delivered around the airport through TCPA applications.</p>

		<p>At present a significant amount of hotel capacity near the airport is not used by airport passengers. As set out in para 13.3.1 of Deadline 1 Submission - 10.9.2 The Applicant’s Response to Actions - ISH 1: The Case for the Proposed Development [REP1-062], The relationship to the airport is:</p> <ul style="list-style-type: none"> • 84% for on-airport hotels • 80% for those in close proximity • 68% for more distant (up to 10 miles away) 3-star hotels • 56% for more distant 4-star hotels <p>It is therefore possible that existing capacity could accommodate more passengers and non-passengers would seek alternatives. Again, the market can be expected to respond to this and increase capacity to meet demand from both airport and non-airport related guests.</p> <p>Any short term constraint would be met by changes in the pattern of those who use hotels and those who travel from home or stay further afield. It would not impede the growth of passenger numbers at the airport.</p>
GEN.2.14	Applicant	<p>Car Park Y – Indicative Construction Sequencing [REP2-016]</p> <p>Action Point 4 of ‘<i>The Applicant’s Response to Actions – ISH8</i>’ [REP6-086] states that “<i>The site for Car Park Y will be used as a temporary construction compound in the early years of construction to support the airfield works and also the surface access works. The construction of the attenuation storage facility will be sequenced in a phased manner and the construction of the multi-story car park will take place following that to avoid any conflict with the provision of the attenuation storage facility.</i>” This response does not deal with the issue of overlap in construction sequencing. The construction compound is shown as being operational from 2024 to the end of 2032. The flood storage facility to be constructed from 2026 to the end of 2028 and phase 1 of the car park constructed in 2031 to the end of 2032. All of these activities are shown occupying the full site of the current car park Y.</p> <p>Explain how the construction compound can be present at the same time as the other construction activities set out.</p>

		<p>The site will be used for the construction compound in the first instance, before approximately a third of it is then used to construct the underground attenuation facility (so the residual two thirds continuing to be used for the construction compound). It is only following the completion of the attenuation facility that works in respect of the car park will be started and those works will be carried out in parallel with the ongoing use of the rest of the site as a construction compound area. Once constructed the car park will remain in situ, alongside the construction compound until such time as the compound is removed at which point the remainder of the site will be developed into car parking.</p> <p>The bars on the Indicative Construction Sequencing, ES Appendix 5.3.3: Indicative Construction Sequencing [REP2-016] show the period of time within which that work is expected to be carried out, not the duration of each activity.</p> <p>The Works Plans [REP6-009] show that both the car park and the attenuation area will be located within the site reflecting the outline nature of the designs and construction logistics planning. The attenuation facility will only require part of the site and the remainder of the site can therefore be used as a construction compound whilst the attenuation facility is being constructed and also when it is operational. There will be a small dedicated and separate temporary compound to support the construction of the attenuation facility but this will not prevent the construction compound operating. Construction compounds are controlled by the Code of Construction Practice (Doc Ref. 5.3) (DCO Requirement 7) and this will be followed in establishing and moving compounds around the Car Park Y site and ensuring safety of operations as adjacent construction activities are carried out. An illustration of the use of only part of the site as a construction compound is shown in Figure 65 of Design and Access Statement - Volume 5 [APP-257] [(PDF-page 47, e-page51).</p> <p>The attenuation facility will be designed and built based on the future loads for the area above to be used as a construction compound, surface car park and ultimately a MSCP (including heavy construction plant/equipment). The attenuation facility will typically be made up of reinforced concrete enclosed cells that do not allow for the ingress of external ground water (aka spills / leaks / precipitation from above). The inlets</p>
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		to the underground attenuation tanks will be controlled and limited to the airfield taxiway drainage network only.
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