



Gatwick Airport Northern Runway Project

Appendix A – Response on Design Matters

Book 10

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1 The Applicant's Response to Deadline 6 Submissions on Design Matters

1.1 Purpose of this Document

1.1.1 This document has been prepared to set out the Applicant's response to design related comments received at Deadline 6. In particular, this document responds to the following Deadline 6 submissions by Interested Parties relating to the Design Principles (including Annex A), Schedule 1 of the Draft DCO, Works Plans and the Parameter Plans:

- Legal Partnership Authorities:
 - **Post-Hearing Submission on Agenda Item 5: Good Design** [[REP6-107](#)]
 - **Post-Hearing Submission on Agenda Item 8: Draft Development Consent Order** [[REP6-110](#)]
 - **Response to Actions Arising at ISH8** [[REP6-111](#)]
- **West Sussex Joint Local Authorities' comments on any further information / submissions received by Deadline 5** [[REP6-116](#)]
- **National Highways' comments on any further information / submissions received by Deadline 5** [[REP6-114](#)]
- **Environment Agency's comments on any further information / submissions received by Deadline 5** [[REP6-098](#)]

1.1.2 Alongside this document, the Applicant has made corresponding updates to application documents for submission at Deadline 7. The amended and new documents are:

- **Draft DCO** (Doc Ref. 2.1)
- **Works Plans** (Doc Ref. 4.5)
- **Parameter Plans** (Doc Ref. 4.7)
- **Design and Access Statement (Volumes 1 to 5)** (Doc Ref. 7.3)
- **Design Principles** (Doc Ref. 7.3) contained in the Design and Access Statement Appendix 1, including **Annex A: The Design Adviser's role and process**.

1.1.3 Changes have also been made to the above documents in response to the ExA's Further Written Questions (ExQ2) published on 1st July 2024. The Applicant's responses to the ExQ2 are contained in **The Applicant's Responses to ExQ2** (Doc Ref. 10.56) and any corresponding changes made to the above documents in response to the ExQ2 are explained in that document.

1.1.4 In connection with the above exercise, the Applicant has also prepared **Informative Sub-Work Plans** (Doc Ref. 4.11) which are submitted at Deadline 7. These are intended to provide additional contextual information to the Legal Partnership Authorities (LPAs) on the anticipated location of works components described in Schedule 1 to the **Draft DCO** (Doc Ref. 2.1). These plans are necessarily informative and do not replace the **Works Plans** (Doc Ref. 4.5) secured by article 6 of the **Draft DCO** because:

- For some works (e.g. Work No. 4 (runways and taxiways)), there is no clear distinction on the ground between components of the work, as described in further detail below. Drawing boundaries for individual sub-works on the **Works Plans** would therefore be artificial and could inadvertently constrain the Applicant's ability to carry out these works; and
- Prior to the detailed design process, the Applicant cannot definitively commit to the precise location for some components of the numbered works. For example, for Work No. 10 (replacement motor transport facilities) the Applicant cannot commit to a precise location for minor components such as the "parts store" or "ramps, pits and tyre store" beyond specifying where the overarching building is likely to be positioned.

1.1.5 To provide further comfort to the LPAs on these works, the Applicant has amended Requirements 4 (detailed design) and 10 (surface and foul water drainage) in version 9 of the **Draft DCO** (Doc Ref. 2.1) submitted at Deadline 7 to provide that, as part of both consultation regarding design and drainage design, and when details of listed works are submitted for design approval, the Applicant must submit a 'compliance statement' which sets out how the proposed design is in accordance with the **Design Principles** (unless otherwise agreed) and complies with the vertical and lateral parameters in article 6 (limits of works). This document will allow the discharging authority to more easily review whether the proposed detailed design is in accordance with the design control measures.

1.2 Legal Partnership Authorities – ISH8 Agenda Item 5 – Good Design

1.2.1 The Applicant's response to the Legal Partnership Authorities' **Post-Hearing Submission on Agenda Item 5: Good Design** [[REP6-107](#)], containing a summary of their oral submissions, is contained in **The Applicant's Written Summary of Oral Submissions – ISH8: Good Design** [[REP6-080](#)] and **The Applicant's Response to Actions – ISH8: Good Design** [[REP6-086](#)].

1.2.2 Specific design-related matters in the Legal Partnership Authorities' Deadline 6 submissions are responded to in this document.

1.3 Legal Partnership Authorities – ISH8 Agenda Item 8 – Draft DCO

1.3.1 This section sets out the Applicant’s response to the points raised by the Legal Partnership Authorities in relation to Schedule 1 of the **Draft DCO** (Doc Ref. 2.1) contained in their response [REP6-110](#).

LPAs’ Deadline 6 Response	The Applicant’s Response
Detail in Work Nos Contained in Schedule 1 of the dDCO	
<p><u>Work No.1 – updated position</u></p> <p>The Authorities’ initial concerns with the description of Work No.1 are set out in ExQ1 DCO 1.39. The Authorities consider the updated drafting of Work No.1, together with the amended Appendix 1 to the Design Principles is fine and so have no further points to make in respect of this work.</p>	<p>Noted.</p>
<p><u>Work No.4</u></p> <p>The concern with Work No.4 is primarily with the Work Plans [REP5-016]. For instance, Sheet 5 of 7 (Drawing number 20000-XX-A-XXX-GA-990006 (revision P03)) shows the location of Work No. 4a-f, h, i, j as follows –</p> <p>The Authorities consider it would be helpful, from a development management perspective, if the drawing (and adjoining sheets) showed each element of Work No. 4(a)-(f), (h),(i), (j), separately. For completeness, the elements are –</p> <p><i>The response contained an extract of the Work Plan and Work No. 4</i></p>	<p>From the outset, it should be noted that Work No. 4, in totality, relates to taxiways and their connections to the existing main runway, the repositioned northern runway and the wider airfield (including some works to a stand, substation and pumping station under part (c) where it relates to Taxiway Lima’s extension). Airport taxiways are hard surfaced pathways within an airfield that facilitate the movement of aircraft to and from the runways and to the wider airfield. The end and start of a particular taxiway would not be perceptible on the ground.</p> <p>The Applicant chose to separate Work No. 4 based on its own internal definitions and planning of the airfield, to provide a fuller description of the proposed works. As an alternative, the Applicant could have chosen to put forward Work No. 4 as a singular work</p>

<p><i>description, which is not repeated here.</i></p>	<p>description covering all taxiway works and only distinguished where works were required to the stand, substation and pumping station.</p> <p>The Applicant choosing the former route and providing more information as to the nature of the intended works should not mean that it is constrained by needing to secure individual work areas for each component of Work No. 4. To do so risks inadvertently constraining the Applicant's ability to build out Work No. 4, as the part of the repositioning and resurfacing works that constitutes e.g. 'Taxiway Tango' or 'End Around Taxiway West' is not an objectively ascertainable fact.</p> <p>In its previous review of the work descriptions at Deadline 3, the Applicant specified particular areas for components of Work No. 4 to the extent possible prior to detailed design in version 4 of the Works Plans [REP3-011 and REP3-012]. The Applicant has submitted at Deadline 7 a standalone Informative Sub-Work Plan for Work No. 4 (Doc Ref. 4.11) which sets out, on an informative basis, the Applicant's anticipated breakdown of the components of Work No. 4. It is hoped that this document will provide useful context for the LPAs without unduly constraining the Applicant's ability to build out the work in due course.</p>
<p><u>Work No. 5</u></p> <p>Regarding Work No.5(a) to (g), the same point applies as in respect of the above-mentioned elements of Work No.4: the JLAs consider it would be helpful if each element of that work was shown on Sheet 3 of 7 of the Works Plan (Drawing number 20000-XX-A-XXX-GA-990004)</p>	<p>In response to the LPAs' comments the Applicant has submitted at Deadline 7 a standalone Informative Sub-Work Plan for Work No. 5 (Doc Ref. 4.11) which sets out, on an informative basis, the Applicant's anticipated breakdown of the components of Work No. 5. This plan distinguishes between parts (a) to (e) which relate to the relocation and removal of existing features. It should be noted that the</p>

<p>(revision P04). At present Work No.5 is shown as –</p> <p><i>The response contained an extract of the Work Plan and Work No. 5 description, which is not repeated here.</i></p>	<p>existing substations and pumping stations are already clearly shown on ES Figure 4.2.1a: Existing Airfield Infrastructure [REP1-019].</p> <p>Parts (f) and (g) have not been distinguished on the Informative Sub-Work Plan as they relate to the reconfiguration of existing remote aircraft stands and the construction of taxiways and aircraft hold points, covering the extent of the Work No. 5 area. Notwithstanding this, the existing aircraft stands to be reconfigured under part (f) are shown on ES Figure 4.2.1a [REP1-019].</p>
<p><u>Work No. 6</u></p> <p>The same point made in respect of Work Nos. 4 and 5 applies to Work No.6 –</p> <p>This is shown on Sheet 1 of 7 of the Works Plans (Drawing number 20000-XX-A-XXX-GA-990002) (revision P03).</p> <p>In particular, the Authorities consider it would be helpful if Work No.6(b) were identified.</p> <p><i>The response contained an extract of the Work Plan and Work No. 6 description, which is not repeated here.</i></p>	<p>In response to the LPAs’ comments, the Applicant has submitted at Deadline 7 a standalone Informative Sub-Work Plan for Work No. 6 (Doc Ref. 4.11) which distinguishes between parts (a) to (f). Notwithstanding this, the locations of the existing stands to be reconfigured (under Work No. 6(c)) are already clearly shown on ES Figure 4.2.1a: Existing Airfield Infrastructure [REP1-019].</p>
<p><u>Work Nos.7 and 8</u></p> <p>The same point applies in respect of Work Nos. 7 and 8 which are shown together on Sheet 1 of 7 of the Works Plans (Drawing number 20000-XX-A-XXX-GA-990002) (revision P03) –</p>	<p>Work Nos. 7 and 8 are shown together as relating to the same area. Work No. 8 relates to the removal of existing features within this area and Work No. 7 relates to works to be constructed in its place, i.e. the Oscar Area. To assist the LPAs, the Applicant has submitted at Deadline 7 a standalone Informative Sub-Work Plan for Work Nos. 7 and 8 (Doc Ref. 4.11)</p>

<p>Work Nos. 7 and 8 consist of the following works –</p> <p><i>The response contained an extract of the Work Plan and Work Nos. 7 and 8 descriptions, which are not repeated here.</i></p>	<p>which shows the components (a) to (c) of Work No. 7 alongside the components (a) to (g) of Work No. 8.</p> <p>Notwithstanding this, it should be noted that the proposed components under Work No. 7 are clearly shown on ES Figure 5.2.1a: Proposed Airport Works [REP6-015] and similarly the works to be removed under Work No. 8 are clearly shown on ES Figure 4.2.1a: Existing Airfield Infrastructure [REP1-019].</p>
<p><u>Work Nos. 9, 10 and 14</u></p> <p>The same points made above apply equally to these Work Nos.</p>	<p>In response to the LPAs’ comments, the Applicant has submitted at Deadline 7 standalone Informative Sub-Work Plans for Work Nos. 9, 10 and 14 (Doc Ref. 4.11). An explanation of what is shown on those plans is provided below.</p> <p><u>Work No. 9</u></p> <p>The Informative Sub-Work Plan distinguishes between individual elements where possible at this stage of the design work. Notably, parts (a), (c) and (e) have been marked. It is not possible to distinguish the remaining parts further at this stage of the design work (even on an informative basis), as the positioning of the card baling facilities and the baled waste storage area has not been finalised at this stage. All of these features will be contained within the overall extent of the premises, which will comprise a hardstanding area, as defined under part (f). As such, parts (b), (d) and (f) remain grouped together on the Informative Sub-Work Plan.</p> <p>Figure 13 of the Design and Access Statement Volume 3 (Doc Ref. 7.3) provides an indicative ground floor plan of the replacement CARE facility.</p>

	<p><u>Work No. 10</u></p> <p>The Informative Sub-Work Plan distinguishes between individual elements where possible. Parts (a), (b), (c), (d) and (h) are to be contained within the main facility building and as such, remain grouped together on the plan. The remaining elements have been individually distinguished.</p> <p>Figure 20 of the Design and Access Statement Volume 3 (Doc Ref. 7.3) provides an indicative ground floor plan of the replacement motor transport facility.</p> <p><u>Work No. 14</u></p> <p>The Informative Sub-Work Plan distinguishes between parts (a), (b) and (c). Part (c) covers the full extent of the works area as it relates to the hardstanding of the area and the placement of the fire training-related structures on it.</p> <p>Figure 44 of the Design and Access Statement Volume 2 (Doc Ref. 7.3) provides an indicative ground floor plan of the replacement fire training ground.</p>
<p>Following ISH8, the Applicant made a suggestion of a new requirement to be included, intended to address some of the concerns raised by the Authorities from a development management perspective. The Authorities have not had sufficient time to consider the proposal in detail and it may appear in the draft DCO to be submitted at D6. They will of course report at a later stage whether their concerns have been met.</p>	<p>Provision for the Applicant to provide the relevant discharging authority with a 'compliance statement' has been added to Requirements 4 (detailed design) and 10 (surface and foul water drainage) in version 9 of the Draft DCO (Doc Ref. 2.1), as explained above.</p> <p>Alongside amendments to the work descriptions also made to the Draft DCO submitted at Deadline 7 and the provision of the Informative Sub-Work Plans (Doc Ref. 4.11) described above, the Applicant considers that it has provided a comprehensive package of design information given the present stage of detailed</p>

	<p>design of the Project, which more than adequately equips the LPAs in advance of consultation and (for listed works) applications for approval in relation to detailed design pursuant to the Requirements of the Draft DCO in due course.</p>
<p>ExA’s Question Regarding Luton Airport DCO and level of detail</p>	
<p>The Authorities’ position in respect of action 24 from ISH8 is set out in their deadline 6 submission Response to Actions Arising at Issue Specific Hearing 8. The Authorities note that the Applicant said they would provide a note on this for comment.</p>	<p>The Applicant’s response to the Legal Partnership Authorities’ Response to ISH8 Action 24 [REP6-111] regarding Luton Rising’s Draft DCO is provided below.</p>
<p>Comments on Work Nos. – where more detail required</p>	
<p><u>Work No.18</u></p> <p>Work No.18 states –</p> <p>“Works to remove and replace the western noise mitigation bund including works to— (a) remove the existing western noise bund; (b) construct the replacement noise bund and wall”.</p> <p>More information is required here. For instance, in the period between when the existing western noise bund is removed and the replacement bund and wall constructed, it is not clear how GAL will mitigate noise from the airport which would have an impact on nearby businesses.</p> <p>The JLA need to understand the sequencing under Work No.18 so that</p>	<p>The LPAs’ concerns relate to the construction sequencing and timing of the removal and replacement of the noise bund, and any interim noise mitigation, which is not considered to be relevant to the description of Work No. 18.</p> <p>Section 5.9 of the Code of Construction Practice (CoCP) (Doc Ref. 5.3) explains the noise and vibration measures to be followed during construction works, including an explanation of the sequencing of noise insulation against the works to the western noise mitigation bund. Further detail on the sequencing of the replacement noise bund has been added to paragraph 5.9.15 of the CoCP submitted at Deadline 7. This commitment will function alongside Requirement 32, which controls the timing of the replacement noise bund and wall against the commencement of dual runway operations.</p>

<p>an acoustic barrier is retained throughout. The JLA note new Requirement 32 (western noise mitigation bund), which states – “(1) The commencement of dual runway operations must not take place until Work No. 18(b) (replacement noise bund and wall) has been completed. (2) Once completed, Work No. 18(b) must not be removed unless otherwise agreed in writing by CBC”.</p> <p>While this requirement is welcomed, it does not address the concern described above.</p>	
<p><u>Work No. 22</u></p> <p>Work No.22(g) is described as – “Works associated with the North Terminal Building including works to— ...</p> <p>(g) construct a multi-storey car park;”</p> <p>The Authorities concerns with car parking are well documented and they consider more specificity would be helpful here e.g. by identifying the maximum capacity of the car park.</p> <p>Greater specificity is also required in respect of the Works listed in the table below. As regards hotels listed in the table, the description could include the number of bedrooms, for the office, the likely floorspace and for the car parks the number of spaces. These details are all set out in the Project Description, Chapter 5 in the ES.</p>	<p>Please refer to the Applicant’s response to ExQ2 DCO.2.6 and DCO.2.17, contained in The Applicant’s Response to ExQ2 – Development Consent Order and Control Documents (Doc Ref. 10.56.4).</p>

<p>A detailed example is provided in the in their deadline 6 submission Response to Actions Arising at Issue Specific Hearing 8 in relation to Action Point 24. Further detail of the Authorities' position were also provided in response to question DCO.1.39 in [REP3-135] (the Authorities' responses to ExQ1).</p> <p><i>The response contained an extract of Work Nos. 26, 27,28, 30, 31, 32 and 33 descriptions, which are not repeated here.</i></p>	
<p><u>Highways Works: Work No.39 (works associated with the River Mole)</u></p> <p>In REP3-135, the Authorities said: "The Authorities consider that GAL should provide further detail to demonstrate how these works when delivered address the assumptions and mitigations to address drainage and ecological issues".</p> <p>The Authorities acknowledge that a flood risk assessment has been prepared and are considering its contents in respect of this Work.</p>	<p>Noted. No response required.</p>
<p><u>Work No.41 (works to create an ecological area at Pentagon Field)</u></p> <p>These works are described as – "(a) deliver approximately 1ha of planting; (b) plant a tree belt approximately 15 metres in length; (c) create spoil bunds".</p> <p>These works will involve the placing of around 100,000m³ of soil at</p>	<p>With regards to part (b) and in response to the LPAs' comment, an approximate length and depth of the proposed tree belt is now included in the description of Work No. 41(b) in the Draft DCO (Doc Ref. 2.1) submitted at Deadline 7. Work No. 41(b) has also been updated to specify the location of the tree belt along the site's eastern boundary, adjacent to Balcombe Road. The corresponding Design Principle DLP19 has been updated in the Design</p>

<p>Pentagon Field and the raising of the site by up to 4m. The Authorities consider the exercise here is closer to land raising than the creation of spoil bunds and consider that a more detailed breakdown of the proposed work is required.</p> <p>Of significant concern is that without more detail in paragraph (c), the planning authority (in this case CBC) does not have any control over the amount of soil being deposited. The amount of soil is not specified in any control document and overall the applicant are proposing to raise the land by around 4 metres but is unclear where the base measurement is taken from.</p> <p>Paragraph (b) should be clearer about the extent of the tree belt, and specify the length and the depth. There is a detailed response about this site in response to Appendix F of the Applicant’s document REP5-078 being submitted by the West Sussex Authorities at Deadline 6. The ExA is invited to consider that document.</p>	<p>Principles (Doc Ref. 7.3) submitted at Deadline 7.</p> <p>Please also refer to the Applicant’s response to ExQ2 DCO.2.18, contained in The Applicant’s Response to ExQ2 – Development Consent Order and Control Documents (Doc Ref. 10.56.4).</p>
<p><u>Work No.43</u></p> <p>This work is described as “Works to construct water treatment works”. As a matter of drafting, this description gives the reader no idea about the extent or nature of the development. These works have changed significantly since the original DCO submission which comprised a much smaller footprint and water treatment</p>	<p>The wording of Work No. 43 has been expanded taking account of the LPAs’ request and is contained in the Draft DCO (Doc Ref. 2.1) submitted at Deadline 7.</p> <p>As the LPAs have acknowledged, the corresponding Design Principle DDP14 for Work No. 43 provides a significant level of detail on the water treatment works. The Design Principles (Doc Ref. 7.3) are secured under</p>

<p>works area than is now proposed, including reedbeds comprising a much greater land take. A significant level of detail about this proposal is included in the Design Principles [REP5-031] at DDP14. The Authorities' view is that the description of the Works should contain more detail, which conveys more clearly, but not necessarily to the same level of detail as the design principles, what is actually being proposed by the Applicant. A suggestion would be</p> <p>“Works to construct water treatment works, including the creation of 6 reedbeds and associated works and including a the reprovision of a car park area”</p>	<p>Requirements 4 and 10 of the Draft DCO (Doc Ref. 2.1).</p>
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Comments on Works Nos.: Construction compounds should be numbered works

<p><u>Ancillary or related development</u></p> <p>The Authorities maintain the position set out in [REP3-135]: Certain of these substantial works should be listed as numbered works in Schedule 1. For example, some of the construction compounds which will be authorised under sub-paragraphs (c) (“building compounds”) and (q) (site construction compounds”) of the list of ancillary or related development at the end of Schedule 1 to the DCO. These will be very substantial work sites, established for many years. In response to the Applicant’s</p>	<p>The Applicant considers the current approach to be appropriate. Building and site construction compounds are by their nature temporary and ancillary to the numbered works being carried out. In this regard, they can be distinguished from the permanent works to remove, relocate and construct elements of the authorised development which comprise the numbered works.</p> <p>The Applicant considers that its approach accords with standard practice in made DCOs. For example, notwithstanding the significant construction period for the Sizewell C nuclear power station, the Sizewell C (Nuclear Generating Station) Order 2022 includes <i>“construction and provision of building</i></p>
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<p>suggestion that further explanation could be included in control documents, the Authorities would say that the key question is ensuring that the detail is adequately captured somewhere in the DCO (albeit, not necessarily in Schedule 1 in every instance).</p>	<p><i>compounds" and "establishment of temporary construction areas and compounds" as 'other associated development' in Part 2 of Schedule 1.</i></p> <p>In any event, the Code of Construction Practice (Doc Ref. 5.3) (particularly section 4.5) sets out a series of specific control measures for temporary construction compounds, including maximum heights, which have been supplemented at Deadline 7. These provide sufficient controls over the establishment of these compounds and it is suggested that the LPAs' comments are best focussed on these provisions rather than including the compounds as specific numbered works in Schedule 1 to the Draft DCO (Doc Ref. 2.1).</p>
<p>Specification of the Maximum number of car parking spaces</p> <p>The Authorities note that the capacity of car parks has a bearing on design, shape and visual impact of the car park and that it is appropriate to have specification on the maximum numbers that can be provided, especially given the SAC commitments and mode-shares operate at a very high level and so site-specific local controls would therefore be helpful.</p>	<p>Please refer to the Applicant's response to ExQ2 DCO.2.6, contained in The Applicant's Response to ExQ2 – Development Consent Order and Control Documents (Doc Ref. 10.56.4).</p>

1.4 Legal Partnership Authorities – Response to Actions Arising at ISH8

- 1.4.1 This section sets out the Applicant's response to the **Legal Partnership Authorities'** [\[REP6-111\]](#) response to ISH8 actions relating to good design, which relates to the **Design Principles** (Doc Ref. 7.3) and Schedule 12 of the **Draft DCO** (Doc Ref. 2.1).

LPAs' Deadline 6 Response	The Applicant's Response
<p>Item 5 – Good Design – Comment on which other works they would like to see in Schedule 11 of the dDCO</p>	
<p>Please see the commentary provided in Appendix A to this document (Design Note - Comments on Design and Access Statement - Appendix 1 -Design Principles (DP) Version 4 [REP5-031]).</p> <p>Table 1 within Appendix A sets out the Works that the Authorities would wish to see included within Schedule 12 and the reason for inclusion.</p> <p>The list could be shortened if the relevant control documents (for example the Design Principles and the Design and Access Statements) and the works limits shown on the Works Plans and the parameter plans were amended to provide more detail. The Authorities are willing to discuss this further with the Applicant.</p>	<p>Please see the Applicant's response to Appendix A below.</p> <p>By reference to the third paragraph of the LPAs' comment, it is hoped that the significant package of additional design information provided at Deadline 7 will allow the LPAs to reduce the number of works they consider appropriate for inclusion in Schedule 12.</p>
<p>Item 5 – Good Design – Provide further information regarding specific changes to the DAS Appendix 1 which they would like to see.</p>	
<p>Please see the commentary provided in Appendix A to this document (Design Note - Comments on Design and Access Statement - Appendix 1 -Design Principles (DP) Version 4 [REP5-031]).</p>	<p>Please see the Applicant's response to Appendix A below.</p>
<p>Item 8 – dDCO – Provide general view of whether the dDCO would benefit from the level of detail in the latest available dDCO available for the Luton NSIP</p>	
<p>The Authorities have already commented in response to ExQ1 DCO1.39 [REP3-135] on a suggested level of detail and remain of the</p>	<p>The LPAs' objection here in relation to the Works Plans (Doc Ref. 4.5) and Parameter Plans (Doc Ref. 4.7) is an</p>

view that more precise detail for some of the works within Schedule 1 would be appropriate. The main concern is that for some works the works plans and parameter plans are drawn so generously a much larger building could be erected than is shown in the DAS. For example, Work 28 (for new hotel, car park and multi-storey car park), the indicative hotel footprint in the DAS [REP2-035] page 33 shows a 'C' shaped hotel footprint 7 storeys high next to a taller multi storey car park. There is nothing currently to stop this hotel building increasing in height or footprint or limiting any reconfiguration in terms of scale and design for the whole of the car park H site (office, hotel and car park), filling much more of the plot with more floorspace and increasing all buildings to the maximum parameter height. This level of flexibility is well beyond what is described in Chapter 5 of the ES 'Project Description'[REP1-017] which suggests an up to 400 bedroom hotel, 3,700 parking spaces and 5,000 sq m office.

The Authorities consider it is reasonable to control the works to what has been described by the Applicant in the ES and has been considered by all parties during the Examination. It is assumed these approximate building sizes have been used to calculate employment and parking calculations which inform other chapters within the ES and the respective impacts, allowing such flexibility could undermine the validity of the supporting evidence.

The Luton dDCO does contain a greater level of detail including parking numbers for the car parks. Some details listed in that dDCO such

objection to the general approach of assessing project impacts prior to detailed design on the basis of a worst-case *Rochdale* envelope. At this stage of design, the precise location and size of the components of Work No. 28 (works at the Car Park H site) are not yet known. Therefore, the Environmental Impact Assessment has been undertaken on the basis of a maximum envelope in which that development will take place, assuming that across the Work No. 28 area there would be development to the height specified in the **Parameter Plans** (Doc Ref. 4.7). That maximum height is secured by article 6 (limits of works) in the **Draft DCO** (Doc Ref. 2.1) by reference to the **Parameter Plans**.

A number of options have been considered for the masterplan for Car Park H (Work No. 28) with an example shown in the **Design and Access Statement** (DAS) (Doc Ref. 7.3). To define which of the uses goes where on the site at this stage of the design would limit future flexibility at the detailed design stage. The extent of the plots for the work components are interdependent so to define specific plot boundaries for components of Work No. 28 would limit how the footprints of these buildings can be designed. Whilst the provisional design for the hotel in the **DAS** is a 'C' shape, this could equally be undertaken in a linear 'I' shape or 'L' shape. Similarly, the multi-storey car park could have internal or

<p>as Work No. 4h include security systems and wayfinding signage may seem over prescriptive but the Authorities would like to see further certainty over the quantum of development and various development elements within the descriptions in the Gatwick DCO. For example, it is suggested that Work No 29 in the Gatwick DCO could be expanded to read “Works to convert up to [add amount] sq m of floorspace to hotel containing up to 250 bedrooms and refurbishment of the building exterior”. Similarly, works comprising car parks could include maximum limits on the number of spaces that may be provided.</p>	<p>external ramps which would affect its footprint.</p> <p>Preserving flexibility for the detailed design stage within a specified and secured maximum envelope that accords with the Environmental Impact Assessment undertaken is standard practice and ensures that the ultimate design for works delivers efficiency of buildings and the public realm between.</p> <p>In response to the LPAs’ comments on parking numbers, please refer to the Applicant’s response to ExQ2 DCO.2.6 and DCO.2.17, contained in The Applicant’s Response to ExQ2 – Development Consent Order and Control Documents (Doc Ref. 10.56.4).</p>
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Item 8 – dDCO – Comment on whether a schedule of parameters should be provided and what detail should it have.

<p>A schedule of parameters was added (as Schedule 13) to the draft DCO submitted at deadline 5 [REP 5-006].</p> <p>The Schedule does no more than set out what the maximum building height is for each of the works listed in it. This is helpful to anyone who wishes only to know that information, but as the heading of the Schedule suggests, it only indicates what the parameter plans (the relevant control document) say.</p> <p>The issue that the Authorities have is about the wide scope which is given to the Applicant by the combination of the limits of the works</p>	<p>Noted. The Applicant understands from this comment that the LPAs' objection is targeted at the contents of the Works Plans (Doc Ref.4.5) and Parameter Plans (Doc Ref.4.7), rather than the nature of Schedule 13 as informative.</p>
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<p>shown on the works plans and the parameter plans.</p>	
<p><i>The response included a description of Work No. 32 and an extract of the Works Plans and Parameter Plans, which is not repeated here.</i></p> <p>So whilst Schedule 13 performs a function of illustrating what the maximum height of each of the buildings listed in it are, it does not provide any further detail or information about how those maximum heights could be further limited within the wide area within which the works can be constructed, taking into account the context of the surroundings. The Applicant would no doubt say that it requires maximum flexibility. But from the Authorities' perspective, Work No. 32 (along with other works mentioned in Schedule 13) is not a "listed work" in Schedule 12, so there is limited scope for the local planning authority (in this case CBC) to influence the design, and in particular the height of the structure. So in order to meet the Authorities' concerns, there would need to be a change in which Schedule 13 is structured. For example, rather than it being simply illustrative of what the parameter plans say, instead it could impose detailed restrictions on the parameter heights at certain places within the works area and impose restrictions on what ancillary and related development may be constructed (if any) above the parameter heights for each work. Or the authorities' objective could be achieved by changes to the works plans and/or parameter plans themselves, or to article 6 (limits of works) to the DCO, in the case of "associated elements".</p>	<p>As above regarding Work No. 28, the LPAs' objection here is to the general approach of assessing project impacts prior to detailed design on the basis of a worst-case <i>Rochdale</i> envelope. At this stage of design, the precise location and size of Work No. 32 (North Terminal Long Stay car park) is not yet known. Therefore, the Environmental Impact Assessment has been undertaken on the basis of a maximum envelope in which that development will take place, assuming that across the Work No. 32 area there would be development to 11m in height. That maximum height is secured by article 6 (limits of works) in the Draft DCO (Doc Ref. 2.1) and the Parameter Plans (Doc Ref. 4.7).</p> <p>The designs shown in the Design and Access Statement (DAS) (Doc Ref. 7.3) are illustrative of the capacity studies done for this site. The layout shown for Work No. 32 in the DAS is one of many successful options tested for that site. At the feasibility and capacity stage of design it is not standard practice to fix the precise final extent of the footprint, to allow for design development and innovation. However, that is what the LPAs appear to be seeking by their requested amendments to the Work Plans (Doc Ref. 4.5).</p> <p>Restricting the precise final location of the decking would be premature as it</p>

	pre-empts the benefits of the further detailed design work that will be undertaken in due course in the normal manner. The visual assessment of the site in the ES encompasses the whole site being developed to the maximum height as a worst case.
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1.4.2 The table below sets out the Applicant’s response to the Legal Partnership Authorities comments on the **Design Principles (Version 4.0)** [REP5-031] contained in **Appendix A** of its **Response to Actions Arising at ISH8** [REP6-111].

LPAs’ Deadline 6 Response	The Applicant’s Response
General Structure and content of the DP document	
In its current form and for the majority of the works, the Authorities do not consider that the information within the DP will give sufficient design control to ensure high quality design. While the Applicants state that Works will need to be in accordance with this document, there is currently so much flexibility with the loosely worded statements that the scale and appearance of the works could be wide open to interpretation and give little scope for the Authorities to influence the design of the structures	<p>The Applicant and the Joint Local Authorities held a meeting on 2 July 2024 to discuss the Authorities’ specific concerns on the Design Principles (Doc Ref. 7.3). The Applicant has made a number of revisions to the Design Principles to seek to address the LPAs’ Deadline 6 comments and those raised in the discussion at the 2 July 2024 meeting.</p> <p>Alongside updates to the Design Principles, the Applicant has reviewed the wording of Schedule 1 of the Draft DCO (Doc Ref. 2.1) to provide additional detail in response to the LPAs’ comments.</p>
Two examples are provided below: DBF11 - <i>“The design of the multi-storey car parking building will incorporate the following design features:</i>	Design Principle DBF11 (now DBF46) was included under the sub-heading for ‘Multi-storey and Decked Parking’, and which specified the relevant Work Nos. Notwithstanding this, the Applicant has updated the decked and multi-storey car

<p><i>The facades will maintain open areas for natural ventilation.</i></p> <p><i>Materials may include galvanized or painted metal frame or constructed in pre-cast or in-situ concrete.</i></p> <p><i>Clearly visible entrance and circulation cores to aid intuitive wayfinding.”</i></p> <p>It is not clear which Works this statement relates to and has therefore no reference to the surrounding areas or how the works design will respond to local context. It provides little detail on the car park design, and does not provide any certainty over materials stating it may be galvanised or concrete. It provides no detail on design quality.</p>	<p>parking related Design Principles to make specific reference to the relevant Work Nos.</p> <p>The wording of this specific Design Principle (now DBF46) has also been amended to provide more clarity on the design materials. Design quality is covered by the Project-wide Design Principle D1 to ensure good design is achieved.</p>
<p>Paragraph 1.1.16 states that the design principles are a response to the ‘Projects vision and objectives’ but it is not clear from this document what those are or even where these are referenced in the wider DCO documentation. Volume 1 of the DAS [REP2-032] reference 3.1.1 sets out a project vision but none of these reference good design or any design ambition for the Project. These should be clear within the DP document.</p>	<p>Good design is part of the project objectives and was a key criteria in the option selection process, as set out in the ES Chapter 3: Alternatives Considered [APP-028].</p> <p>Volume 1 of the Design and Access Statement (Doc Ref. 7.3) (paragraph 3.1.1) has therefore been updated to reflect this, recognising good design as part of the Project’s vision and objectives.</p>
<p>The DP document is a rather confusing and does not follow any logical structure when discussing the various works and is hard to navigate. It is not grouped numerically by Works number or in order of works type for example Airfield works are DBF18-19 and at DBF44-53. A</p>	<p>The structure of the Design Principles (Doc Ref. 7.3) is explained in paragraphs 1.1.15 to 1.1.18 of the document.</p> <p>In respect of the ordering of the Design Principles, these were not originally intended to be drafted in the same order as the Work Nos., however reference to the Work Nos. was added during the</p>

<p>clearer structure to the document would be most helpful.</p>	<p>Examination stage, in response to the LPAs' previous feedback.</p> <p>Notwithstanding this, in response to this latest comment from the LPAs', the Detailed Built Form Design Principles (in Table 1.11.2) have been re-ordered to correspond to the sequencing of the Work Nos. As a consequence, the numbering of all of the Detailed Built Form Design Principles has changed in Version 5.0 of the Design Principles submitted at Deadline 7.</p>
<p>With no visuals or illustrations the document is a tricky read and there is still no sense of design quality or understanding of context through the identification of key features such as site constraints (such as trees, rivers or nearby residential properties), there is no design or palette of materials for the public realm There is no aspirational language within the document which give any comfort to the Authorities of any design in terms of finish and sustainability being sought. Without any spatial illustrations the wording becomes convoluted.</p>	<p>It is not considered appropriate for the Design Principles (Doc Ref. 7.3) to include visuals or illustrations as any images would only be illustrative at this stage of the design process and it would conflate illustrative plans (which are not intended to be approved plans) with the Design Principles which are secured by DCO Requirements 4, 5, 6 and 10 and must be adhered to. Instead, such illustrative material is provided in the Design and Access Statement (Volumes 1 to 5) (Doc Ref. 7.3).</p> <p>The purpose of the Design Principles is to serve as a control over the detailed design, secured under the Draft DCO (Doc Ref. 2.1), hence specific design wording (rather than illustrative material) is considered to be the appropriate method of control. This is a common approach taken by other DCO applications.</p> <p>As explained in Table 53 of The Applicant's Response to Deadline 4 Submissions [REP5-072], the Project-Wide Design Principles require regard to be given to a site's context and potential impacts. The site-specific Design Principles then</p>

	<p>provide further commentary on specific site constraints and considerations which were identified as being required through the ES and DAS analysis.</p> <p>The Applicant disagrees that the Design Principles do not provide a sense of design quality or consider design finishes and sustainability. Most notably, the Project-wide Design Principle D1 is focused on achieving good design and ensuring that the detailed design is visually appropriate and sensitive to place, with an appearance that demonstrates good aesthetics; and is sustainable, durable, adaptable and resilient. Further detail on design finishes, appearance and sustainability is then provided within the remainder of the Design Principles on a site-specific basis.</p>
<p>A good example is DBF10 which reads: “In order to limit visibility to Charlwood House, the design of Car Park X (Work No. 31) will:</p> <p><i>The response repeated Design Principle DBF10 which is not repeated here.</i></p> <p>If a wider OS base plan was provided, it could provide clear reference to the important site constraints including the precise siting Charlwood House, identification of the important tree boundaries, the wider countryside and could provide clarity on the site access and position of the deck car park. This level of detail has been requested on previous occasions and full details of the concerns with this site and its relationship</p>	<p>The Applicant considers that the existing wording of Design Principle DBF10 (now DBF45) in the Design Principles (Doc Ref. 7.3) is suitable to control the detailed design in relation to surrounding site constraints, with updates having been made to this Design Principle at earlier deadlines in response to the LPAs’ previous comments. The current wording of this Design Principle (now DBF45) places requirements on the detailed design of Car Park X (Work No. 31) with regard to Charlwood House, the wider countryside, and existing tree and hedgerows along the site’s boundaries.</p> <p>The position of the decked car park (and its associated maximum height) is specified and secured through the Parameter Plans (Doc Ref. 4.7) and article 6 of the Draft DCO (Doc Ref. 2.1).</p>

<p>to other documents are attached as Appendix 2 at the end of this document.</p>	<p>Notwithstanding this and in response to the LPAs' concerns, GAL has updated Figure 11 of the Design and Access Statement (Volume 2) (Doc Ref. 7.3). The updated figure shows the site's location and annotates the contextual considerations, which are secured through Design Principle DBF45.</p>
<p>The document does not reference local design policies and guidance or reflect the important local design principles such as tree retention and replacement which should be integral to the landscaping principles, it is considered that these general principles do need to be reinforced further and reference to address these policies included in the DP.</p>	<p>Table 53 of The Applicant's Response to Deadline 4 Submissions [REP5-072] submitted at Deadline 5 explained why the Applicant does not consider it to be appropriate or necessary to reference local planning policies within the Design Principles. This position is also applicable to local design guidance.</p>
<p>Design principle BF4 is a welcome addition to the document and would appear to address ENV9 in the Crawley Borough Local Plan however the wording is recommended to be adjusted as follows: "New buildings will be designed to maximise water efficiency and to meet the minimum standards for BREEAM 'Excellent' rating within the Water Category".</p>	<p>Design Principle BF4 of the Design Principles (Doc Ref. 7.3) has been revised to reflect the LPAs' request and is submitted at Deadline 7.</p>
<p>The Applicants should include a similar design principle to address local plan policy ENV6 which deals with sustainable design and construction.</p>	<p>Please refer to the Applicant's response at Deadline 5 [REP5-072], and as referenced above, on the appropriateness of including reference to local planning policies within the Design Principles (Doc Ref. 7.3).</p>
<p>While the Authorities have not been able to work through and suggest changes to the DP document line by line, some modifications to the wording have been</p>	<p>The Applicant has responded to Appendix 3 below and would like to thank the LPAs for their feedback. However, the Applicant would like to reiterate its request for all of</p>

suggested in Table 3 (Attached as Appendix 3)

the LPAs' comments on the Design Principles to be provided in order that it can comprehensively consider and address the LPAs' comments. This was noted in **The Applicant's Response to Deadline 4 Submissions** (para 3.17.15) [\[REP5-072\]](#) and raised orally at ISH8 [\[REP6-080\]](#), and was reflected in the ExA's ISH8 Action Point 7.

The Applicant still hopes to reach an agreed suite of principles between the parties but requires all comments on the **Design Principles** (Doc Ref. 7.3) in order to achieve this.

- 1.4.3 The table below sets out the Applicant's response to the Legal Partnership Authorities comments on Schedule 12 of the Draft DCO (Doc Ref. 2.1) contained in **Appendix A** of its **Response to Actions Arising at ISH8** [\[REP6-111\]](#).
- 1.4.4 In some instances, the LPAs have stated "to be confirmed" against the Work Nos. The Applicant would kindly request that the LPAs clarify what this relates to.
- 1.4.5 As an overarching response to the LPAs' comments in [\[REP6-111\]](#) on the **Design Principles** (Doc Ref. 7.3) and Schedule 12 of the **Draft DCO** (Doc Ref. 2.1), the Applicant wishes to highlight:
- In reading the LPAs' comments, the Applicant notes that reference is often made to the height of buildings proposed under the various Work Nos. and the associated visual impacts. **ES Chapter 8: Landscape, Townscape and Visual Resources** [\[APP-033\]](#) provides the assessment of the visual impacts of the Project's built components and the Applicant would direct the LPAs to the assessment provided in that report to understand the visual impacts of the Project. The LPAs should note that the basis of the assessment is the maximum building extents on a worst-case basis, as discussed above.
 - At Deadline 5 and as explained in **The Applicant's Response to Deadline 4 Submissions** [\[REP5-072\]](#), the Applicant added a Project-wide Design Principle (Design Principle D1) on design quality to reinforce that the detailed design of the authorised development achieves good design. The design quality Design Principle reflects the content of the Airports National Policy Statement (June 2018) (paras 4.32 to 4.34) and the National Networks National Policy Statement (March 2024) (para 4.28 to 4.29), and a similar Design Principle (DQ.01) was contained within the Design Principles for the London Luton Airport Expansion DCO application¹.
 - Requirements 4 and 10 of the **Draft DCO** (Doc Ref. 2.1) have been revised at Deadline 7 to require the submission of a compliance statement as part of the detailed design (and drainage design) consultation and approval processes. The statement must demonstrate how the detailed design / drainage design complies with

¹ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020001/TR020001-003026-7.09%20Design%20Principles.pdf>

the **Design Principles** (Doc Ref. 7.3) and, where relevant, the **Works Plans** (Doc Ref. 4.5) and **Parameter Plans** (Doc Ref. 4.7).

LPAs' Deadline 6 Response			The Applicant's Response
Work No.	Brief Description	Reason for addition to Schedule 12	
Schedule 12 Works			
1 (part)	<p>Northern Runway (only in respect of those parts that involve surface or foul water drainage)*</p> <p>*Detailed approval under requirement 10(3) (surface and foul water drainage only)</p>	<p>While sufficient information is now provided in the Design Principles (DP)[REP5-031] to address the design appearance (R4), the drainage assumptions for the runway works have not been incorporated into the DP. It is the detailed drainage designs that remain of concern and would require further details for approval (R10). The Authorities' suggestion is that the Table in Schedule 12 could be amended by using the asterisked note as shown.</p>	<p>The Legal Partnership Authorities response to Schedule 1 of the Draft DCO (Doc Ref. 2.1) states in respect of Work No. 1 that <i>"The Authorities consider the updated drafting of Work No.1 , together with the amended Appendix 1 to the Design Principles is fine and so have no further points to make in respect of this work."</i></p> <p>The Applicant would kindly ask that the LPAs clarify its position given these conflicting statements at Deadline 6.</p>

			<p>Notwithstanding this, and as explained in The Applicant's Response to ISH2 Actions [REP1-063], the Applicant is the operator of a Civil Aviation Authority (CAA) certified aerodrome and is therefore required to seek prior approval from the CAA for impending changes affecting its infrastructure or management systems. In accordance with CAP 791 (Procedures for changes to aerodrome infrastructure), the design of Works Nos. 1 to 7 is required to follow a three-part process before works can commence and a licence to operate the revised aerodrome is granted. CAP 791 sets out the design information, safety assurances and analysis that must be provided as part of the design approval process.</p> <p>It is therefore not considered appropriate or necessary that Work No. 1 is subject to detailed design</p>
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			approval by a Local Planning Authority when there is already in place a CAA approval process that must be carried out, as required by UK Regulation (EU) 139/2014.
4 – to be confirmed	Runways and Taxiways	Further design detail is needed on these works elements. DPF18 gives limited detail on drainage but no information on the rest of the works listed. There is no clarity on the design of this area.	For the reasons given above, it is not considered appropriate or necessary that Work Nos. 4 to 7 are subject to detailed design approval by a Local Planning Authority.
6	Pier 7	This is a significant building (major scale development) which would be visible within the airfield and needs to be considered in terms of its design quality and sustainability measures	In relation to these works, please refer to the Applicant's response to the Legal Partnership Authorities' comments [REP6-110] on Schedule 1 of the Draft DCO above and the corresponding Informative Sub-Work Plans (Doc Ref. 4.11) submitted at Deadline 7 to assist the LPAs in understanding the components of these works, without unduly constraining the Applicant's ability to deliver the Project given the current stage of detailed design.
7 – to be confirmed	Oscar Area	This covers the same land as Works Area 8. There is no detail in DBF51 or DBD52 to explain what the design and appearance of these works would be and on indication on indicative layout. It is unclear if there are any implications for drainage.	

9	Central Area Recycling Enclosure	Please see Table 2 (request for design review).	For the same reasons as above, the Applicant does not consider it appropriate or necessary for there to be detailed design approval for this work.
10	Motor Transport Facilities	Building up to 15.25m. Little information in DP on likely design and layout or on materials and finish. Mapping suggests tree /hedge loss and site intersected by a watercourse. No indication as to how these features would be safeguarded or addressed.	<p>As explained in paras 5.2.64 to 5.2.65 of ES Chapter 5: Project Description [REP6-013], the existing motor transport facilities located to the north of Taxiway Juliet (shown on ES Figure 5.2.1h [REP6-015]) are proposed to be demolished and replaced in the north western part of the airport (shown on ES Figure 5.2.1a [REP6-015]) under Work No. 10.</p> <p>Detailed design approval of Work No. 10 is not considered necessary as the works relate to the removal and replacement of existing facilities, and not the construction of new structures or facilities that would entail a new design.</p>

			<p>Separately and as explained above, the Applicant has submitted Informative Sub-Work Plans (Doc Ref. 4.11) to distinguish between individual elements of Work No. 10 on an informative basis where possible, in response to the LPAs' request.</p> <p>In relation to the concern regarding tree / hedge loss, Requirement 28 of the Draft DCO (Doc Ref. 2.1) requires that the Applicant submit an Arboricultural and Vegetation Method Statement for approval by CBC prior to any vegetation or tree clearance being carried out. This provides sufficient control on such activities.</p>
11	Grounds Maintenance Facilities	Issues that need to be addressed and specified as part of DP Possible issues with materials storage if hazardous or odour if composting – any design safeguards. No details on size or appearance of building other than it would be a portacabin. This is not considered high quality design given presumably the structure is a	As explained in paras 5.2.67 to 5.2.69 of ES Chapter 5: Project Description [REP6-013], the existing ground maintenance facilities (shown on ES Figure 5.2.1h [REP6-015]) are proposed to be demolished and replaced in the south eastern part of

		<p>permanent building. No detail on the sustainability of the construction, justification for portacabins as appears to be permanent building. Visual impact likely to be limited.</p>	<p>the airport (shown on ES Figure 5.2.1a [REP6-015]) under Work No. 11.</p> <p>Detailed design approval of Work No. 11 is not considered necessary as the works relate to the removal and replacement of existing facilities, and not the construction of new structures or facilities that would entail a new design.</p> <p>In response to the LPAs' specific concerns and as explained in para 5.2.67 of ES Chapter 5, the design must comply with the requirements of the Control of Substances Hazardous to Health Regulations 2002, this being a separate regulatory regime.</p>
12	Airfield Surface Transport Facilities	<p>No detail in DP but parameter plans provide for building that would be up to 15m tall. No detail on appearance, visual impact or sustainability or how such a structure will address its surroundings.</p>	<p>As explained in paras 5.2.70 to 5.2.72 of ES Chapter 5: Project Description [REP6-013], the existing airfield surface transport facility (shown on ES Figure 5.2.1h [REP6-</p>

		Potential to be visually prominent close to Perimeter Road South.	<p>015) is proposed to be demolished and replaced in the south eastern part of the airport (shown on ES Figure 5.2.1a [REP6-015]) under Work No. 12.</p> <p>Detailed design approval of Work No. 12 is not considered necessary as the works relate to the removal and replacement of the existing facility, and not the construction of new structures or facilities that would entail a new design.</p> <p>ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033] assesses visual impact of the authorised development on a worst case basis using the maximum building extents.</p>
14	Fire Training Ground	The DP statement is vague on what works are proposed here DBF37 stating the works will ‘involve the re-use and relocation of existing facilities as far as possible’. Can more information be supplied about what will be accommodated on	As explained in paras 5.2.84 to 5.2.86 of ES Chapter 5: Project Description [REP6-013] , the existing fire training ground (shown on ES Figure 5.2.1h [REP6-015]) is

		<p>this site and the likely structures heights materials etc? There is no information on likely layout or key considerations for such a facility. Will it be bigger than existing?</p>	<p>proposed to be demolished and replaced north of its existing location (shown on ES Figure 5.2.1a [REP6-015]) under Work No. 14.</p> <p>Detailed design approval of Work No. 14 is not considered necessary as the works relate to the removal and replacement of the existing training ground, and not the construction of new structures or facilities that would entail a new design.</p> <p>In response to the LPAs' specific comments, Design Principle DBF20 of the Design Principles (Doc Ref. 7.3) has been updated to explain the existing facilities at the fire training ground which are to be replaced at the new location. This information is already provided in para 5.2.84 of ES Chapter 5 [REP6-013].</p> <p>Separately and as explained above, the Applicant has submitted</p>
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			<p>Informative Sub-Work Plans (Doc Ref. 4.11) at Deadline 7 which distinguish between individual elements of Work No. 14 where possible, in response to the LPAs' request.</p>
15	Satellite Airport Fire Service Facility	<p>There are no details provided on the appearance of the facility in any control document which has a parameter plan which covers the entire area with the building up to 15 m high. There is reference to a main garage building in the DP - DBF39 which will be positioned near the taxiway. Further information is needed in DP to explain what the works in this area are likely to comprise of, an indicative layout and a palette of materials, sustainability of the building. Given visual prominence on edge of airfield this should be subject to design approval. From aerial photography it can be seen that St Michaels Church is approx. 180 m to the south, there is a nearby watercourse to the south, site is partially in a floodplain and east-west hedge line could be impacted.</p>	<p>As explained in para 5.2.87 of ES Chapter 5: Project Description [REP6-013], a new satellite airport fire service facility is required to meet aerodrome certificate requirements, including response time to incidents.</p> <p>The building serves an important safety and functional requirement, controlled by the CAA and subject to the CAA approval process described above. It is therefore not considered appropriate or necessary that Work No. 15 is subject to detailed design approval by a Local Planning Authority when there is already in place a CAA approval process.</p>

16	Hangar	Please see Table 2 (request for design review).	<p>In response to the LPAs' comments, revised and additional site-specific Design Principles on the proposed Aircraft Hangar (Work No. 16) have been added to the Design Principles (Doc Ref. 7.3) submitted at Deadline 7.</p> <p>On the basis of these additional Design Principles, which include further detail on the scale, appearance and context of the proposed Hangar, it is not considered necessary that Work No. 16 is subject detailed design approval by a Local Planning Authority.</p>
17 To be confirmed	Hangar 7 support structures	There is no detail in the DAS or DP document explaining what structures are to be removed and from where and what structures are to be replaced and where. Further information is needed on what is meant by these works in order to understand if there are any design impacts.	As explained in paras 5.2.91 to 5.2.92 of ES Chapter 5: Project Description [REP6-013], some of the existing Hangar 7 support structures are proposed to be moved slightly southwards to accommodate the extension to Taxiway Lima

		What is on the land currently, any loss of landscaping?	<p>(shown on ES Figure 5.2.1a [REP6-015]) under Work No. 17.</p> <p>Detailed design approval of Work No. 17 is not considered necessary as the works relate to the relocation of existing support structures, and not the construction of new structures that would entail a new design.</p>
18	Western Noise Mitigation Bund	<p>It is not considered that there is sufficient detail about this part of the works. The design principles need to reference the required acoustic performance of the bund and must ensure that details are provided to demonstrate the design meets the required standards. There should also be reference to the need for phasing plan and interim provisions to be agreed and put in place to safeguard properties during replacement of this existing bund with the new one. Mapping suggests feature is within floodplain and could impact upon one watercourse. TPO protected trees along northern boundary</p>	<p>The LPAs' concerns relate to the sequencing of the works and interim noise mitigation measures, which do not relate to the remit of the Design Principles. The Applicant has responded to these concerns previously at Table 14 of The Applicant's Response to Deadline 4 Submissions [REP5-072]. The Code of Construction Practice (CoCP) (Doc Ref. 5.3) and Requirement 32 of the Draft DCO (Doc Ref. 2.1) control the timings of the works under Work No. 18 and the noise mitigation measures that</p>

			<p>must be in place prior to the removal of the existing noise bund. Wording has been added in paragraph 5.9.15 of the CoCP at Deadline 7 to provide further detail on the sequencing for Work No. 18 in response to the LPAs' comments.</p>
19 To be confirmed	Pumping Station 2a	<p>There are no details about the design of these works in the DAS or DP. These need to be added and to demonstrate design is consistent with drainage strategy.</p>	<p>As explained in The Applicant's response to ExQ1 DCO.1.57 [REP3-089] and again in Table 53 of The Applicant's Response to Deadline 4 Submissions [REP5-072], no specific design principles are included for Work No. 19 as this relates to the construction of a Pumping Station which would be dictated by its functional design. Similarly, it is not considered necessary that a pumping station is subject to detailed design approval by a Local Planning Authority.</p>
20 To be confirmed	Re-align Larkins Road	<p>No design aesthetics to consider but further detail should be added to the DP to explain how the</p>	<p>The LPAs' request for detailed design approval of Work No. 20 is</p>

		drainage impacts from the realigned road would be addressed in the design.	not considered sufficiently justified purely on the basis of drainage impacts, as such matters are controlled under drainage-specific requirements in the Draft DCO (Doc Ref. 2.1). Notably under DCO Requirement 23, Work No. 20 cannot be commenced until a Flood Compensation Delivery Plan setting out the timeframe for delivering necessary prior fluvial mitigation works has been submitted for approval to West Sussex County Council (in consultation with the Environment Agency).
22 (d), and (g)	North Terminal Works	22(a) to (c) are already included in Schedule 12 and should remain Please see Table 2 (request for design review). Insufficient design detail at present.	The Applicant explained in its oral submissions at ISH8: Good Design [REP6-080] why it does not consider a Design Adviser’s review of the IDL extensions to the North and South Terminal buildings is necessary, taking account of CBC’s previous approvals on proposed developments at the airport, namely
23 (c)	South Terminal Works	23(a) is already included in Schedule 12 and should remain Please see Table 2 (request for design review). Insufficient design detail at present	

			<p>CBC has clearly stated in such approvals that it does not consider buildings within the centre of the airport to have a significant adverse visual impact, being screened and some distances from sensitive uses. Such conclusions are applicable to the North and South Terminal IDL extensions, being airside extensions, enclosed by existing airport buildings and not readily visible from outside the airport. The extensions would therefore not meet the LPAs' own review criteria described in para 4.3 of this submission [REP6-111] in that they are neither highly visible or adjacent to sensitive receptors or have added design complexity. The same justification applies as to why these works should not be subject to a detailed design approval by a Local Planning Authority.</p> <p>The extensions would also be of a similar form and appearance to the</p>
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			<p>adjacent terminal areas and are not considered complex in design terms.</p> <p>Notwithstanding the above, the Applicant is mindful of discussions at ISH8 on these works and therefore in that context has put forward new and expanded Design Principles (Doc Ref. 7.3) on the North and South Terminal buildings to further control their detailed design, namely in Design Principles DBF29 to DBF34. This further justifies the Applicant’s position as to why detailed design approval of these works by a Local Planning Authority is not required.</p>
24	North Terminal Forecourt	Please see Table 2 (request for design review). Insufficient design detail at present	<p>In response to the LPAs’ comments, additional site-specific Design Principles on the North Terminal and South Terminal forecourts (Work Nos. 24 and 25) have been added to the Design Principles (Doc Ref. 7.3) submitted at Deadline 7.</p>
25	South Terminal Forecourt	Please see Table 2 (request for design review). Insufficient design detail at present	

			On the basis of these additional Design Principles, which include further detail on the layout, appearance and requirements of the forecourts, it is not considered necessary that Work Nos. 24 and 25 is subject to detailed design approval by a Local Planning Authority.
26	Hotel	Already included in Schedule 12 and should remain	No response required.
27	Hotel	Already included in Schedule 12 and should remain	No response required.
28 (b), (c) and (e)	Hotel , multi-storey car park and office	28(a) is already included in Schedule 12 and should remain Please see Table 2 (request for design review). Insufficient design detail at present	Work Nos. 28(b)-(e) are being added to the scope of Design Adviser review as explained below, to reflect that the design review process should be able to consider the design of all works on the Car Park H site holistically. This is specified in Annex A of the Design Principles (Doc Ref. 7.3) submitted at Deadline 7.

			<p>Given the inclusion of the non-hotel elements of Work No. 28 in this design review process and the Design Principles applicable to Work No. 28 as a whole, it is not necessary for the non-hotel elements to also be subject to detailed design approval as listed works under the Draft DCO (Doc Ref. 2.1). The local authorities will have had involvement in the design review process for the site as a whole and will be further formally consulted on the final design for the non-hotel works through DCO Requirement 4(1).</p>
29	Conversion of Destinations Place to hotel	<p>There is currently insufficient information in the Design Principles to safeguard quality design given no information on the design aesthetics just stating it will respond to the needs of the hotel rather than any reference to consideration of site context. This is a prominent part of the South Terminal and should be subject to detailed approval. There should also be some further scrutiny of sustainability energy performance etc.</p>	<p>In response to the LPAs' comment, Design Principle DBF39 of the Design Principles (Doc Ref. 7.3) has been amended to provide additional design detail on the external façade and in the context of surrounding existing buildings and energy performance.</p>

			On the basis of the expanded Design Principle and given this is an existing building to be converted (and not a new building form), detailed design approval by a Local Planning Authority is not considered necessary.
30	Car Park Y	Please see Table 2 (request for design review). Insufficient design detail at present	The design of this work is already controlled by the suite of relevant Design Principles which are secured by Requirement 4 of the Draft DCO (Doc Ref. 2.1). This is supplemented by the inclusion of this work within the scope of design adviser review at Deadline 7. Given this extensive existing (and now supplemented) design control, the Applicant does not consider it necessary to also provide for design approval of this work as a listed work.
31	Car Park X	Please see Table 2 (request for design review). Insufficient design detail at present	As above for Work No. 30.

32	Decked Car Park	<p>This DP for this site suggests an open deck structure and is unclear on the method of illumination. There is still no additional information provided to address the concerns raised about the visual impact of the lighting on Grade ii* Charlwood Park Farmhouse requested in table 7.1C [REP1-068] and explained in detail at paragraphs 7.40, 7.41, 7.46 and 7.50</p>	<p>The design of external lighting for the decked car parks (including Work No. 32) is explained and controlled in Design Principle DBF51 of the Design Principles (Doc Ref. 7.3). Further clarity is requested from the LPAs' on their concerns, given the level of detail in this existing Design Principle.</p> <p>Design Principle DBF43 has been amended following the meeting between GAL and the JLAs on 2nd July 2024, to specify that additional or enhanced façade cladding on decked car parking structures will be considered at the detailed design.</p>
33	Purple Parking	<p>The concerns at this site relate to tree retention and screening. There is still insufficient detail in the DP to deal with concerns expressed in paragraphs 8.43 8.55 and 24.74 [REP1-068]</p>	<p>Works to existing boundary vegetation, based on the worst case scenario, is shown on Sheet 13 of the Airport Preliminary Tree Removal Plans contained in Appendix I of ES Appendix 8.10.1: Tree Survey Report and Arboricultural Impact</p>

			<p>Assessment [REP6-038 to REP6-049] and Sheet 13 of the Airport Preliminary Tree Removal and Protection Plans contained in Appendix A of the Outline Arboricultural and Vegetation Method Statement (Doc Ref. 5.3). As shown on these plans, only one tree (T283) is identified for removal along the site’s southern boundary adjacent to the existing highway, referenced in paras 8.43 and 8.55 of the Joint West Sussex Local Impact Report [REP1-068].</p> <p>Requirement 28 of the Draft DCO (Doc Ref. 2.1) provides that, prior to vegetation or tree clearance, an Arboricultural And Vegetation Method Statement must be submitted to CBC for approval.</p> <p>In response to the LPAs’ comment, Design Principle DBF52 of the Design Principles (Doc Ref. 7.3) has been amended to place specific</p>
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			<p>design requirements on the surface car parking (Work No. 33) to limit vegetation to be removed and to explain the role of new landscaping provisions.</p> <p>On the basis of the additional detail in Design Principle DBF52 and DCO Requirement 28, detailed design approval of Work No. 33 by a Local Planning Authority is not considered necessary.</p>
34	Car Park B	Should be subject to design detail approval given that the site is to be used initially as a contractor's compound and then laid out as open space	<p>Further justification is required from the LPAs' as to why the initial use of the site as a construction compound warrants the need for detailed design approval by a Local Planning Authority.</p> <p>The detailed design of the Car Park B replacement open space is controlled by a number of Design Principles (DLP1 to DLP7) and specific landscaping proposals in para 4.7.4 of the Outline Landscape</p>

			<p>and Ecology Management Plan (Part 1) (Doc Ref. 5.3).</p> <p>The laying out of the construction compound (and particularly its height) is controlled by section 4.5 of the Code of Construction Practice (Doc Ref. 5.3), secured by Requirement 7 of the Draft DCO (Doc Ref. 2.1). The subsequent use of the site for replacement open space is controlled by article 40 (which requires the submission of an open space delivery plan) and requirement 8 (which requires the submission of a landscape and ecology management plan).</p>
38	Museum Field	<p>While there is an indicative landscape plan within the OLEMP, further detail will need to be considered of the drainage principles, land levels and profiles and the impact on ecology and flooding during and post construction. DDP16 seems very uncertain about the design approach to be adopted suggesting measures that could be</p>	<p>The Design Principles (Doc Ref. 7.3) relate to the detailed design of the final, permanent Project and not drainage and ecology measures during construction which are controlled by the Code of</p>

		done rather than providing any certainty about what is intended.	<p>Construction Practice (Doc Ref. 5.3).</p> <p>Details on Work No. 38(a) will also be covered by the Flood Compensation Delivery Plan, in accordance with DCO Requirement 23 and which is to be submitted and approved by West Sussex County Council (in consultation with the Environment Agency) as the relevant drainage bodies.</p> <p>On this basis, detailed design approval of Work No. 38 is not considered necessary or justified.</p>
39	River Mole Works	The details set out in the DP statement are unclear. It not clear if DDP17 and DDP18 relate to these works or where the features referred to will be situated. It is unclear how these statements tie into the wider drainage strategy.	<p>Within the Design Principles (Doc Ref. 7.3), Design Principles DDP17 and DDP18 are under the sub-heading of Work No. 39.</p> <p>Notwithstanding this and in response to the LPAs' comments, these Design Principles have been amended to make clear that these relate to Work No. 39 and an</p>

			updated version is submitted at Deadline 7.
40	Land North East of Longbridge Roundabout	<p>40(a) is already included in Schedule 12 and should remain. The introduction of Schedule 12 (Non-Highway Works for which Detailed Design Approval is Required) is noted within the revised REP5 – 006/7 draft Development Consent Order (Version 7). MVDC is particularly interested in the reference to Works No 40(a) (the pedestrian foot bridge over the River Mole) and recognises that the amended dDCO would result in the separation of agreeing the design for the Replacement Open Space (ROS) element, from the footbridge, despite the two being unavoidably linked. Previously (REP4-054) the Council has expressed its wish to be the signing-off authority for the Landscape and Ecology Management Plan (LEMP) for the listed Works No.40 as the Local Planning Authority within which the ROS is located. The dDCO currently proposes that sign off should be obtained from CBC in consultation with MVDC and RBBC. It is the Council’s view that, in the spirit of securing good and cohesive design, the sign off for both the footbridge and the</p>	<p>The LPAs' submission is not entirely clear but the Applicant understands that MVDC is content with the current inclusion of Work No. 40(a) in Schedule 12 of the Draft DCO (Doc Ref. 2.1).</p> <p>In version 9 of the Draft DCO submitted at Deadline 7, the Applicant has specified that MVDC (in consultation with RBBC) should be the discharging authority for the detailed design approval for Work No. 40(a) and for any LEMPs for Work No. 40. In this regard the Applicant has accommodated the specific request of MVDC.</p>

		<p>ROS more generally should be undertaken by the same planning authority. That being said, it is recognised that the Applicant’s approach to highlighting Works.No 40(a) specifically through the introduction of Schedule 12, and separately from the wider proposed LEMP process, does have some merit in terms of ensuring the that connecting footbridge can be achieved more swiftly if needed and in advance of the ROS. For this reason, the Council does not object to the inclusion of Schedule 12.</p>	
41	Pentagon Field	<p>Please see WSCC Deadline 6 response for further detail in response to REP5-078. There are currently insufficient details in the DP and other documents to control the works and landform proposed for this site.</p>	<p>Please refer to the Applicant’s response to ExQ2 DCO.2.6, contained in The Applicant’s Response to ExQ2 – Development Consent Order and Control Documents (Doc Ref. 10.56.4).</p>
42 – to be confirmed	Habitat enhancement, weir and fish pass	<p>There are no details in the DP statement about these works , where the drainage feature will be positioned and what the drainage specifications will need to be.</p>	<p>Further clarity is requested on the LPAs’ request as there are a series of Design Principles (Doc Ref. 7.3) related to Work No. 42, namely Design Principles L3, DBF62 and DBF63. These Design Principles are</p>

			<p>under the sub-heading related to Work No. 42 however the Applicant has also revised these Design Principles to ensure Work No. 42 is explicitly referenced for the LPAs' benefit.</p>
43	Water Treatment Works	<p>These works are in a sensitive location with archaeological, ecological and drainage constraints. Nearby properties mean issues such as noise and odour need to be address in the design detail. The Authorities consider the extent of the works are unclear from the description but the design principles as worded do not respond to these environmental constraints. More detail is needed in the DP document and to ensure these details are successfully implemented through a design approval process.</p>	<p>The environmental constraints and measures referenced in the LPAs' comment is covered by the existing Design Principles (Doc Ref. 7.3) or other control documents, namely:</p> <ul style="list-style-type: none"> ▪ ES Appendix 7.8.2: Written Scheme of Investigation for West Sussex (Doc Ref. 5.3) secures archaeological measures in relation to the site; ▪ ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan (Doc Ref. 5.3) secured landscaping and ecological measures in relation to the site, to be detailed in the relevant Landscape and Ecology Management Plan for

			<p>approval under DCO Requirement 8;</p> <ul style="list-style-type: none"> ▪ As explained in Change Application Report [AS-139] (Table 6), there would be no odour emissions from the constructed wetland (reed beds). ▪ Noise from the operations of the construction wetland (reed beds) would be from the blowers, and which would be mitigated through the use of acoustic hoods and acoustic fencing. These measures are secured under the existing wording of Design Principle DDP14. <p>On the basis of the above, no changes to the Design Principles (Doc Ref. 7.3) are considered necessary and it is not considered that the case has been made for the</p>
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			inclusion of this work as a listed work in Schedule 12.
Additional Works Items		The following relate to the main contractor compounds which the JLA's suggest should be listed as Works in Schedule 1 and listed for approval under Schedule 12	<p>The Design Principles (Doc Ref. 7.3) relate to the detailed design of the final, permanent Project. Construction measures, including controls over the temporary construction compounds, are set out in the Code of Construction Practice (CoCP) (Doc Ref. 5.3) secured by DCO Requirement 7. It is therefore not necessary for such compounds to also be secured in Sch 1 of the Draft DCO (Doc Ref. 2.1).</p> <p>In response to the LPAs' comments and following the discussion at ISH8 [REP6-080], the Applicant has amended Section 4.5 of the CoCP to specify additional measures for the temporary compounds where these are not already covered by environmental management systems and measures in the existing CoCP.</p>

		<p>Where the LPAs' have raised concerns on the visual impacts of compounds, the Applicant has placed additional requirements on the design of these compounds in the CoCP relative to the assessment in ES Chapter 8: Landscape, Townscape and Visual Impacts [APP-033] and which was summarised in The Applicant's Response to ExQ1 LV.1.1 – Appendix A [REP3-098].</p> <p>It is not considered necessary that the construction compounds are subject to detailed design approval by a Local Planning Authority. These are temporary compounds, controlled by a suite of measures within the CoCP, and not part of the final, permanent Project.</p> <p>The Applicant has further explained above why temporary construction compounds need not be included in Schedule 1, in response to the Legal</p>
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			Partnership Authorities – ISH8 Agenda Item 8 – Draft DCO above.
	Main Contractor compound MA1	Requested added to DP. Works would be up to 25m high, cover an area of around 4 hectares have in excess of 500 parking spaces and provide accommodation for a workforce of circa 700 works. Visual impact over 14 year period.	<p>The maximum height of the compound is already secured by Table 4.1 of the CoCP (Doc Ref. 5.3).</p> <p>The CoCP submitted at Deadline 7 has been amended to also ensure that the MA1 compound is provided with measures to minimise visual impacts on users of the Sussex Border Path at Russ Hill, where the compound would be visible from based on the assessment in ES Chapter 8: Landscape, Townscape and Visual Impacts [APP-033].</p>
	Airfield Satellite Compound	Requested added to DP. While visually away from nearby occupiers site is close to ecologically sensitive Brockley Wood and River Mole and is within floodplain. Further details needed to safeguard these environmental constraints to	The airfield satellite compound is to be subject to environmental measures already detailed in the CoCP (Doc Ref. 5.3), namely:

		<p>address matters such as layout, light spill, dust suppression, potential impact on watercourse.</p>	<ul style="list-style-type: none"> ▪ Section 4.9 explains the controls over construction lighting and to minimise light spill; ▪ Section 5.6 explains the drainage related construction measures, including measures to protect existing watercourses, and with further detail contained in Annex 1: Water Management Plan [REP3-020]. ▪ Section 5.8 explains the dust measures, management and monitoring to be carried out during construction, set out in full detail in the Annex 9: Construction Dust Management Strategy [REP5-022] and which Construction Dust Management Plans must be prepared in general accordance with.
	<p>Car Park Z compound</p>	<p>Request add to DP. CBC mapping shows watercourse along SW boundary and site is partially within floodplain. Some landscaping</p>	<p>Construction measures to protect existing watercourses and the</p>

		<p>along SW boundary . Adjacent to Lowfield Health employment area which also has hotel and St Michaels Church (latter is noise sensitive use and listed building) Layout needs careful consideration.</p>	<p>floodplain are detailed in Section 5.6 of the CoCP (Doc Ref. 5.3).</p> <p>The CoCP submitted at Deadline 7 has been amended to ensure that the layout of the compound has regard to Lowfield Heath employment area to the south-west.</p>
	<p>Car Park Y Compound</p>	<p>Request to add to DP. There needs to be clear understanding how this compound use relates to other development planned for this site. Surrounding tree loss, ecological impacts and drainage impact along and visual impacts need to be fully addressed.</p>	<p>The Applicant's response is provided as follows:</p> <ul style="list-style-type: none"> ▪ The Applicant has provided further detail on the relationship being the temporary compound on Car Park Y and the final, permanent Project elements in response to ExQ2 GEN.2.14 (Doc Ref. 10.56). ▪ Section 5.6 of the CoCP explains the drainage related construction measures, with further detail contained in Annex 1: Water Management Plan [REP3-020].

			<ul style="list-style-type: none"> The CoCP submitted at Deadline 7 has been amended to ensure that the Car Park Y compound is provided with measures to minimise visual impacts on users of the Sussex Border Path, River Mole and Riverside Garden Park based on the assessment in ES Chapter 8: Landscape, Townscape and Visual Impacts [APP-033].
	<p>South Terminal roundabout contractor compound</p>	<p>Request to add to DP. The proposed location of the compound will make it highly visible to users of the A23 London Road and nearby residential properties close to residents to the west of Balcombe Road.</p>	<p>The CoCP submitted at Deadline 7 has been amended to ensure that the South Terminal roundabout compound is provided with measures to minimise visual impacts on users of the PRow 362a and NCR21 and occupiers of commercial buildings at Meadowcroft House based on the assessment in ES Chapter 8: Landscape, Townscape and Visual Impacts [APP-033].</p>

	<p>Longbridge roundabout contractor compound</p>	<p>Request to add to DP. Use of this area of land will require some clearance of trees/shrubbery and this should be clearly understood prior to starting on site to ensure this is done sensitively to minimise the impacts to properties and businesses within the vicinity as much as is practicably possible. While the content of REP4-040 is noted, the construction compound will be in relative proximity to a conservation area and care must be taken in terms of both the compound itself and the access.</p>	<p>Appendices A and C of ES Appendix 5.3.2: Annex 6 – Outline Arboricultural and Vegetation Method Statement (oAVMS) (Doc Ref. 5.3) contain the Preliminary Removal and Protection Plans for trees and vegetation at Longbridge Roundabout based on the worst case assessment. Prior to any vegetation or tree clearance, detailed Arboricultural and Vegetation Method Statements must be submitted to and approved by CBC (in consultation with MVDC, RBBC and TDC to the extent that they are the relevant LPA) under Requirement 28 of the Draft DCO (Doc Ref. 2.1) and in substantial accordance with the oAVMS. This existing arrangement complies with the LPAs’ request in that the clearance of any trees or vegetation will be understood and approved by the relevant LPAs prior to the works being carried out.</p>
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			<p>The CoCP submitted at Deadline 7 has been amended to ensure that the Longbridge Roundabout compound is provided with measures to minimise visual impacts on users of Riverside Garden Park and Church Meadows, occupiers of Dairy Farm and pedestrians using footways on A217 and Brighton Road, based on the assessment in ES Chapter 8: Landscape, Townscape and Visual Impacts [APP-033].</p>
	<p>Car Park B compound</p>	<p>Request to add to DP. The layout should respect any existing trees and landscaping to be retained including that to be incorporated into the future Replacement Open Space. Appropriate access should be retained to nearby rights-of-way. The design should be sensitive to the residential properties at 92-98 The Crescent with regard to overlooking, privacy and noise. 24/7 access to the telecoms base station would need to be retained in the scheme.</p>	<p>The Applicant's response is provided as follows:</p> <ul style="list-style-type: none"> ▪ Prior to any vegetation or tree clearance, detailed Arboricultural and Vegetation Method Statements must be submitted to and approved by CBC (in consultation with MVDC, RBBC and TDC to the extent that they are the relevant LPA) under Requirement 28 of the Draft

			<p>DCO (Doc Ref. 2.1) and in substantial accordance with the oAVMS.</p> <ul style="list-style-type: none"> ▪ Measures to manage impacts on existing Public Rights of Way are detailed in ES Appendix 19.8.1: Public Rights of Way Management Strategy [REP2-009], to be developed in detailed PRow Implementation Plans in line with Requirement 22 of the Draft DCO. ▪ Section 5.9 of the Code of Construction Practice (Doc Ref. 5.3) explains the noise related construction measures.
	<p>Reed Bed Compound</p>	<p>Request adding details to DP in connection with Works 43. Currently no detail on extent of this compound as while within DCO Project boundary this is not within works area. Layout need to address ecological safeguards, tree protection routing and be clear on visual impacts and duration. These works could be agreed as part of</p>	<p>The Works Plans (Doc Ref. 4.5) relate to the final, permanent Project and not the temporary construction compounds, hence the compounds are not within the works area for Work No. 43.</p> <p>As explained above, prior to any vegetation or tree clearance, detailed</p>

		<p>Schedule 12 approval for Works 43 but note this compound is not within the Works area.</p>	<p>Arboricultural and Vegetation Method Statements (AVMS) must be submitted to and approved by CBC (in consultation with MVDC, RBBC and TDC to the extent that they are the relevant LPA) under Requirement 28 of the Draft DCO (Doc Ref. 2.1) and in substantial accordance with the oAVMS (Doc Ref. 5.3). As explained in Section 4 of the oAVMS, the relevant AVMS will detail the arboricultural and vegetation protection measures to be installed during the construction of the relevant works.</p>
<p>Of those Works excluded from Table 1, it is considered that 3 of these require further detail to be provided either within the DP statement or on the Works plans these are:</p>		<p>Please see the Applicant’s response below.</p>	
<p>Works 5 – Aircraft Holding Area (Charlie Box) - There is limited detail in DBF47, it would be helpful to confirm that the relocated substations will remain within this works area. The Works plan area shown is quite extensive, it would helpful if locations of the works were clearer. For example, where are the substations and de icer storage tanks are being located and what to and what are these likely to comprise of in terms of size and appearance?</p>		<p>As explained above and in The Applicant’s Response to ISH2 Actions [REP1-063], the Applicant is the operator of a Civil Aviation Authority (CAA) certified aerodrome and is therefore required to seek</p>	

prior approval from the CAA of impending changes affecting its infrastructure or management systems. In accordance with CAP 791 (Procedures for changes to aerodrome infrastructure), the design of Works Nos. 1 to 7 is required to follow a three-part process before works can commence and a licence to operate the revised aerodrome is granted. CAP 791 sets out the design information, safety assurances and analysis that must be provided as part of the design approval process.

Further detail in the Design Principles for Work No. 5 is therefore not considered necessary as it may impede the CAA approval process that must be carried out, as required by UK Regulation (EU) 139/2014.

In relation to the Works Plans, please refer to the Applicant's response above to the **Legal**

	<p>Partnership Authorities’ comments [REP6-110] on Schedule 1 of the Draft DCO (Doc Ref. 2.1) and the corresponding plans submitted at Deadline 7 to assist the LPAs in understanding the components of Work No. 5.</p>
<p>Works 8 – Removal of airside supporting facilities - Work (f) the Emergency Traffic Control Tower prior to demolition is proposed to be recorded to Historic England Level 3 (given the rarity of the heritage asset) and this detail is to be incorporated into the West Sussex WSI, this amendment is still awaited. There are no other design detail issues with demolition works however, in respect of the Works plans for all these buildings that are being removed it would be helpful is the sub-elements for demolition can be identified.</p>	<p>As explained in the Applicant’s response to ExQ1 DCO.1.57 [REP3-089], no specific design principles are included for Work No. 8 as it relates to the removal of existing airside support facilities and not the construction of new/replacement structures or facilities that would entail a new design.</p> <p>The revised West Sussex WSI (Doc Ref. 5.3) has been submitted at Deadline 7 to confirm that the demolition of the former emergency air traffic control tower will be carried out in line with Historic England</p>

	Level 3, secured under Requirement 14 of the Draft DCO (Doc Ref. 2.1).
<p>Works 13 – Rendezvous Point North - The DP statement would benefit from little more detail of the works layout and approximate site area. Are the portacabins single or double stacked? Aerial photography suggests a tree belt across site, can any assurances be provided on tree retention or replacement planting if these are removed?</p>	<p>As explained in paras 5.2.74 to 5.2.75 of ES Chapter 5: Project Description [REP6-013], the existing Rendezvous Point North (shown on ES Figure 5.2.1h [REP6-015]) is proposed to be relocated to the north of the central airport area (shown on ES Figure 5.2.1a [REP6-015]) under Work No. 13.</p> <p>Detailed design approval of Work No. 13 is not considered necessary as the works relate to the relocation of existing facilities, and not the construction of new structures or facilities that would entail a new design.</p>

1.4.6 The table below sets out the Applicant’s response to the Legal Partnership Authorities comments on the scope of works subject to be subject to an independent design review as set out within the **Design Principles (Version 4.0)** [\[REP5-031\]](#) contained in **Appendix A – Appendix 1 – Table 2 (Commentary on the Scope of Works to be subject to a Design Review)** of its **Response to Actions Arising at ISH8** [\[REP6-111\]](#).

LPAs' Deadline 6 Response				The Applicant's Response
Work No.	Description	Recommendation	Reason	
Commentary on the Scope of Works to be subject to a Design Review				
9	Central Area Recycling Facility	Add to review	<p>Although the CARE facility is not of significant scale, the design of waste management facilities is crucial to ensuring that the impacts associated with waste management (including but not limited to noise, odour, dust, vermin) are limited. The CARE facility will be subject to relevant environmental permitting, and it is assumed that these will operate effectively, however, it is crucial that due consideration is given to the likely impacts on the local environment (as set out in paragraph 7 and Appendix B, NPPW).</p>	<p>Work No. 9 relates to the replacement and repurposing of the existing CARE facility. A Design Adviser's review is not considered necessary or justified given the works comprise the replacement of existing facilities/buildings.</p> <p>In addition to the above and in response to the LPAs' reasons, the Applicant wishes to highlight:</p> <ul style="list-style-type: none"> As the LPAs note in their response, the CARE facility will be subject to an Environmental Permit from the Environment Agency, being the appropriate regulatory body. The permit for the replacement facility will

				<p>prescribe processes for reducing the risk of pests, vermin and dust (as is the case for the permit associated to the existing CARE facility).</p> <ul style="list-style-type: none"> Further information on the operation of the facility is provided in the Operational Waste Management Strategy (OWMS) [REP3-070]. Under Requirement 25 of the Draft DCO (Doc Ref. 2.1), an Operational Waste Management Plan is to be submitted for WSCC’s approval prior to the replacement CARE facility being brought into routine operation, which must be in substantial accordance with the OWMS.
16	New Hangar	Add to review	<p>This is a substantial structure up to 32 m high which will be visible from the both the airfield and the land to the north. The value of careful design can be seen with the more recent Boeing Hangar (subject to planning permission) which is considered to be a much higher quality and considered design in terms of scale and</p>	<p>In response to the LPAs’ comments, revised and additional site-specific Design Principles on the proposed Aircraft Hangar (Work No. 16) have been added to the Design Principles (Doc Ref. 7.3) submitted at Deadline 7.</p> <p>On the basis of these additional Design Principles, which include further detail on</p>

			<p>appearance than other hangar structures on the airfield. The new hangar is in very a sensitive location on the NW part of the Airfield close to the River Mole, it would benefit from further design consideration once the operator requirements are known. Please also see WSLIR, page 435 [REP1-068] and comments to Agenda Item 5 , ISH8 – Post Hearing Submissions.</p>	<p>the scale, appearance and context of the proposed Hangar, it is not considered necessary that Work No. 16 is subject to a Design Adviser’s review.</p>
22	<p>North Terminal works (a) IDL extension - north (b)IDL extension – south (c) Baggage reclaim – extension (d) Autonomous vehicle station (f) reconfigure internal facilities (g)</p>	<p>Add to review</p>	<p>The North Terminal building is of a significant scale and is a major landmark for airport users. It is considered that a holistic approach to design should be adopted and all elements should be considered as whole. The approach to the terminal is a key feature in the public realm and often the first impression many passengers will have of the airport. The works will be much more visible in the short to medium term with the extensive tree loss proposed along the A23 to facilitate the highway improvements . There is so little information currently on the design and appearance of these</p>	<p>The Applicant explained in its oral submissions at ISH8: Good Design [REP6-080] why it does not consider a Design Adviser’s review of the IDL extensions to the North and South Terminal buildings is necessary, taking account of CBC’s previous approvals on proposed developments at the airport, namely CBC has clearly stated in such approvals that it does not consider buildings within the centre of the airport to have a significant adverse visual impact, being screened and some distances from sensitive uses. Such conclusions are applicable to the North and South</p>

	Multi storey car park G		works, it is considered that these should be subject to further scrutiny. It is suggested that works a, b, c, d and g are incorporated in a design review process along with Work no 24. The reconfiguration of the internal facilities while not development would benefit from being part of the brief as consideration is integral to the wider design approach to the building. [Car Park Y (see listing below) could be added to this grouping as it forms part of public realm around North Terminal].	Terminal IDL extensions, being airside extensions, enclosed by existing airport buildings and not readily visible from outside the airport. The extensions would therefore not meet the LPAs' own review criteria described in para 4.3 of this submission [REP6-111] in that they are neither highly visible or adjacent to sensitive receptors or have added design complexity. The extensions would also be of a similar form and appearance to the adjacent terminal areas and are not considered complex in design terms.
23	South Terminal works (a) extend the International Departure Lounge on levels 10, 20, 30, and 40; (b) reconfigure internal	Add to review	The South Terminal building is of a significant scale and is a major landmark for airport users. It is considered that a holistic approach to design should be adopted and all elements should be considered as whole. The approach to the terminal is a key feature in the public realm and often the first impression many passengers will have of the airport. There is so little information currently on the design and appearance of these works,	Notwithstanding the above, the Applicant is mindful of discussions at ISH8 on these works and therefore in that context has put forward new and expanded Design Principles (Doc Ref. 7.3) on the North and South Terminal buildings to further control their detailed design, namely in Design Principles DBF29 to DBF34.

	facilities; (c) construct the South Terminal Autonomous Vehicle Station;		these should be subject to further scrutiny. It is suggested that works 23 (a),(c) and Works no 25 are incorporated in a design review process .The reconfiguration of the internal facilities while not development would benefit from being part of the brief as consideration is integral to the wider design approach to the building.	
24	Upgrade to North Terminal forecourt including access roads	Add to review	See Works No 22 above	In response to the LPAs' comments, additional site-specific Design Principles on the North Terminal and South Terminal forecourts (Work Nos. 24 and 25) have been added to the Design Principles (Doc Ref. 7.3) submitted at Deadline 7.
25	Upgrade to South Terminal forecourt including access roads	Add to review	See works 23 above	On the basis of these additional Design Principles, which include further detail on the layout, appearance and requirements of the forecourts, it is not considered necessary that Work Nos. 24 and 25 is subject to a Design Adviser's review.
26	Hotel north of MSCP3	Review	Agree with Applicant	No response required.

27	Hotel on Car Rental Site	Review	Agree with Applicant	No response required.
28	Works at car park H including Hotel, office multi storey car park and vehicle and pedestrian accesses	Modify to include all works (a), (b), (c) and (e)	<p>Work area 28 is identified as a single area on both the Works and Parameter plans containing building works up to 27m high with an additional 6 metres (up to 35m) marked as ‘associated elements’ [REP5-018] drawing 990101 Rev P02. While the DAS volume 4 [REP3-035] shows an ‘indicative’ layout and separate buildings, the relationship between the elements is very important to the future users of all facilities. Given the visual prominence of this gateway site at the entrance to South Terminal it is important the public realm and relationship between these buildings is considered comprehensively. There are much better design solutions than the indicative blocks that are proposed and this site merits a much more thoroughly considered design approach.</p>	<p>The Applicant has agreed to the LPAs’ request and amended Annex A of the Design Principles (Doc Ref. 7.3) to specify that Car Park H (Work No. 28) shall be subject to the Design Adviser’s review.</p>

30	Car Park Y earthworks, attenuation storage facility and multi storey car park	Add to review	This site while currently screened will be open and highly visible once all the trees are cleared as is proposed to facilitate the highway works . This leaves the site highly visible to road users and residents to the north and is on a gateway approach to the North Terminal. The resultant building is up to 27m tall and will be very visually prominent. It requires a bespoke design solution in order to be sympathetic to its setting.	The Applicant has agreed to the LPAs' request and amended Annex A of the Design Principles (Doc Ref. 7.3) to specify that the multi-storey Car Park Y (Work No. 30(b)) shall be subject to the Design Adviser's review.
31	Car Park X, earthworks, flood compensation area, outfall structure, access improvements, deck parking, surface parking	Add to review	This site occupies a sensitive location on the southern edge of the airfield with open countryside and residential properties including a Grade II* listed building immediately to the south. The resultant structure is up to 11m tall and currently is standard design. It requires a bespoke design solution in order to be sympathetic to its setting.	The Applicant has agreed to the LPAs' request and amended Annex A of the Design Principles (Doc Ref. 7.3) to specify that Car Park X (Work No. 31) shall be subject to the Design Adviser's review.

35	Highway works South Terminal Junction	Modify to include works (w) to (z)	The Authorities consider it is illogical not to consider the drainage works as part of the wider highway design. The visual impact of the proposed attenuation and pond (Works 35(y)) are integral to the design and appearance of the highway, junction and its setting in the wider public realm. A holistic approach should be taken considering all key elements.	The sub-areas of Works Nos. 35 to 37 referenced in the LPAs' response relate to the surface access works proposed as part of the Project. The detailed design of these works are to be subject to National Highways' (NH) approval under Requirement 6 of the Draft DCO (Doc Ref. 2.1) and the protective provisions for the benefit of National Highways in Part 3 of Schedule 9 to the draft DCO. These provisions set out National Highways' specific requirements as regards drainage details to be submitted for approval and it is therefore not appropriate to cut across this by introducing local authority involvement by making the national highway works subject to the design review process. NH has not requested that these elements are subject to the Design Adviser's review and, given NH are the relevant determining body for the surface access works, the LPAs' request is not considered justified.
36	Highway works to North Terminal Junction	Modify to include works (r) to (z)	The Authorities consider it is illogical not to consider the highway structures and drainage works as part of the wider highway design. The visual impact of the retaining walls and bridge structures along with the proposed attenuation and pond (Works 36(z) are integral to the design and appearance of the highway, junction and its setting in the wider public realm. A holistic approach should be taken considering all key elements.	
37	Highway works to	Modify to include	The Authorities consider it is illogical not to consider the drainage works as part of the wider highway design. The visual impact	

	Longbridge Roundabout	works (m) and (n)	of the proposed drainage elements (Works 37(m) and (n) are integral to the design and appearance of the highway, junction and its setting in the wider public realm. A holistic approach should be taken considering all key elements.	In addition, the LPAs' request is focused on the drainage element of these works and is not considered sufficiently justified purely on the basis of drainage impacts, as such matters are controlled under drainage-specific requirements in the Draft DCO (Doc Ref. 2.1). For example, the drainage works are not to be commenced until a Flood Compensation Delivery Plan has been submitted for approval by West Sussex County Council (in consultation with the Environment Agency) under DCO Requirement 23, being the appropriate drainage approving bodies.
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1.4.7 The table below sets out the Applicant's response to the Legal Partnership Authorities comments on the **Design Principles (Version 4.0)** [[REP5-031](#)] contained in **Appendix A – Appendix 3** of its **Response to Actions Arising at ISH8** [[REP6-111](#)].

LPAs' Deadline 6 Response		The Applicant's Response
Principle	Comment / Proposed Changes	

<p>L2</p>	<p>New line after grasslands; ‘An integrated irrigation system will be included to ensure that new planting survives dry periods.’</p>	<p>An integrated irrigation system can be considered as part of the detailed design process, however the Applicant cannot commit to such a measure at this stage until this detailed design work is underway.</p> <p>In any event, the detailed Landscape and Ecology Management Plans (LEMP), secured under Requirement 8 of the Draft DCO (Doc Ref. 2.1), will specify the monitoring and management arrangements for the landscaping provisions of the Project.</p>
<p>L4</p>	<p>Second bullet ‘Minimise’ requires further clarity Change to:</p> <p>‘Minimise adverse impacts on the character of surrounding landscapes and townscapes during construction and early planting phases. By 2047 full restoration and improvement of landscapes and townscape will be achieved.</p> <p>Bullet 3 Issue of Coalescence of settlements is local plan matter. Should be removed and replaced with ‘Restoration of Green Barrier along A23 London Road</p>	<p>The Design Principles (Doc Ref. 7.3) relate to the detailed design of the final, permanent Project. For instance, Design Principle L4 relates to the role of vegetation retention proposals and the benefits of this.</p> <p>With regards to the LPAs’ first requested change (on bullet point 2), this suggested wording is not considered relevant to the role of the Design Principles in that:</p> <ul style="list-style-type: none"> ▪ Construction arrangements are secured through the Code of Construction Practice (Doc Ref. 5.3); and

	and M23 Spur Road separating south Horley from the airport and related infrastructure.'	<ul style="list-style-type: none"> Long-term monitoring and management arrangements for the Project's landscaping works will be confirmed through the Landscape and Ecology Management Plans, in accordance with the Outline Landscape and Ecology Management Plan (Doc Ref. 5.3). <p>The Applicant has amended the wording of Design Principle L4 to respond to the LPAs' second requested change, regarding bullet point 3.</p>
L6	New bullet New planting will be well integrated with existing green open spaces and create enhanced habitat corridors.	Design Principle L6 of the Design Principles (Doc Ref. 7.3) has been amended in line with the LPAs' request.
BF1	After 'operation' add; 'including scope 3 emissions.'	<p>This additional wording is not considered necessary as the existing Design Principle already directs that new buildings must be designed and constructed to achieve Net Zero emissions during operation.</p> <p>The Applicant's commitment in relation to Scope 3 emissions, including GAL's commitment to working with its partners operating existing ground vehicles and buildings on-site, is set out in the Carbon</p>

		Action Plan [APP-091] secured under Requirement 21 of the Draft DCO (Doc Ref. 2.1).
BF2	Remove ‘will consider how’ and replace with; ‘incorporate technologies to reduce reliance...’	This wording is not considered appropriate in the context of this being a Project-wide Design Principle. Some elements of the Project relate to the relocation of existing structures, such as Hangar 7 support structures (Work No. 17), and therefore do not entail new structures or buildings that would entail a new design (and thereby allow for new technologies to be introduced).
BF3	Replace ‘should consider the implementation of’ with ‘will include’	Design Principle BF3 of the Design Principles (Doc Ref. 7.3) has been amended taking account of the LPAs’ request.
DBF26	Consider is too loose a term. After Conservation Area add; ‘and seek to minimise light spillage from the highway into Church Meadows and Riverside Garden Park.’	The Applicant has revised the wording of Design Principle DBF59 (previously DBF26) to address the LPAs’ comment on the word “consider”. The additional wording on light spillage is not necessary as Project-wide Design Principle L8 requires that lighting is controlled to be contained within the relevant site boundary.

DBF27	Add after Conservation Area; 'and adjacent residential properties the west of Woodroyd Avenue and Longbridge Road.'	The Applicant has revised the wording of Design Principle DBF27 (now DBF60) of the Design Principles (Doc Ref. 7.3) to address the LPAs' request.
DLP1	Replace 'such as' with 'including'	Design Principle DLP1 of the Design Principles (Doc Ref. 7.3) has been amended in line with the LPAs' request.
DLP8	Noted but concerned that the footbridge location has not been finalised by this stage.	No response required, however the Applicant wishes to highlight that Work No. 40(a) regarding the pedestrian footbridge has been added to Annex A of the Design Principles (Doc Ref. 7.3) in that the works shall be subject to the Design Adviser's review. The works are also specified in Schedule 12 of the Draft DCO (Doc Ref. 2.1), such that they will be subject to detailed design approval under DCO Requirement 4.
Additional Principles	Include a set of design principles for bridge and elevated structures, considering the shape, materials, finishes, elevations, lighting and relationship with features the elevated structure is spanning and the wider landscape context.	Excluding the pedestrian footbridge (covered by Work No. 40(a) referenced above), the bridges and elevated structures proposed by the Project form part of the proposed surface access works covered by Works Nos. 35 to 37. The description of these works in Schedule 1 of the Draft DCO (Doc Ref.

		<p>2.1) details the scale and length of these bridges and elevated structures, as well as being visually shown on the Surface Access Highways Plans – Structure Section Drawings [APP-022] submitted for approval. These drawings also described the material of the key feature of the relevant bridge / structure.</p> <p>The detailed design of these works are to be subject to National Highways’ (NH) approval under Requirement 6 of the Draft DCO (Doc Ref. 2.1). NH has not requested a set of design principles for these elements beyond the information already contained in the DCO application and therefore, given NH are the relevant determining body for the surface access works, it is not considered that the LPAs’ request for further design principles of these elements is necessary.</p>
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1.5 West Sussex Joint Local Authorities

1.5.1 This section sets out the Applicant’s response to the points raised by the **West Sussex Joint Local Authorities** [REP6-116] in relation to the **Parameter Plans** [X] and the **Design Principles** (Doc Ref. 7.3).

West Sussex JLA’s Deadline 6 Response	The Applicant’s Response
<p>4.7 Parameter Plans – For Approval Version 3</p>	
<p>In respect of Works Plan 99101 P02 – Works Area 28 (Car Park H). It appears from the written text in the ES Chapter 8, page 81 Table 8.7.1 which sets out the maximum design scenarios [APP-033] that the wireline plans are based on a maximum height of building at 27m with no reference to any ‘associated elements’ such as roof plant or lighting Columns. The plans show an additional 6m added to the top of this parameter drawing ‘associated elements’. Are the visualisations correct for the site given the commentary in the Chapter 8 of the ES or do they need to be redrawn to account for the additional 6 metres?.</p> <p>It is unclear why the Applicant has adopted a different approach has been adopted for Works Area 28. The Authorities would like confirmation that for all other parameter plans the maximum height includes all plant and equipment and in the case of the decked and multi-storey car parks includes the height of any proposed lighting columns.</p>	<p>The relevant Parameter Plan (Doc Ref. 4.7) for Work No. 28 has been revised at Deadline 7 to remove the maximum associated elements.</p>
<p>Design and Access Statement Appendix 1 – Design Principles Version 4 (Clean)</p>	
<p>The Authorities would recommend that the climate change allowance is increased to 40%, as per our previous comments to DDP1.</p>	<p>As noted in Paragraph 3.7.15, given the adopted lifetime for the airfield works of 40 years (up to 2069), the airfield</p>

<p>No further comments from the Authorities regarding drainage solutions related to ecology.</p>	<p>surface water drainage design has adopted the central allowance of plus 25 per cent for the 2070s epoch (2061 to 2125) in accordance with the Environment Agency Flood Risk Assessments: Climate Change Allowances guidance for the 1 per cent (1 in 100) AEP event.</p>
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1.6 National Highways

1.6.1 This section sets out the Applicant’s response to the points raised by National Highways (NH) [\[REP6-114\]](#) in relation to the **Design Principles** (Doc Ref. 7.3).

NH’s Deadline 6 Response	The Applicant’s Response
<p>Deadline 5 Submission – 7.3 Design and Access Statement Appendix 1 – Design Principles Version 4</p>	
<p>National Highways welcomes the defining of the role of the Design Advisor and scope and process of detailed design review. National Highways also welcomes the confirmation of the specific works numbers, as applicable to the strategic road network, into the remit of Design Adviser scope.</p>	<p>Noted. No response required.</p>
<p>While the role and scope is defined in the Annex A, paragraph 1.6.3 states that the Design Report, as the defined output of the Design Adviser’s review, will be advisory and non-binding on GAL. Paragraph 1.6.4 states that GAL will take into account any recommendations made by the Design Adviser. National Highways seeks clarification from the Applicant as to how any conflict would be resolved should the Design Advisers deem that that design principles have not been achieved. This is important to National Highways, as in addition to National</p>	<p>Please refer to the Applicant’s response to ISH8 Action Point 11 submitted at Deadline 6 regarding the wording of paragraphs 1.6.3 and 1.6.4, contained in Section 7 of The Applicant’s Response to Actions – ISH8: Good Design [REP6-086].</p> <p>GAL recognises that ‘good design’ necessarily has an element of subjectivity about it and that GAL will liaise with National Highways and the LPAs during the design review process.</p>

<p>Planning Policy, the National Highways Licence (Department for Transport, 2015) requires a focus on good design. Paragraph 5.26 of the Licence states, “The holder must have due regard to relevant principles and guidance on good design, to ensure that the development of the network takes account of geographical, environmental and socio-economic context.”</p>	<p>Should the Design Adviser consider there to be a clear conflict with the Design Principles, then GAL would expect the Design Adviser’s Design Report to set out a series of recommendations and areas for further consideration (in line with paragraph 1.6.2 of Annex A). GAL considers that any difference of view would be best managed through discussion and dialogue with NH colleagues, much in the same way as happens today, with both parties engaging at various levels within their respective organisations.</p>
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1.7 Environment Agency

1.7.1 This section sets out the Applicant’s response to the points raised by the Environment Agency (EA) [[REP6-098](#)] in relation to the **Design Principles** (Doc Ref. 7.3).

EA’s Deadline 6 Response	The Applicant’s Response
<p>Design and Access Statement Appendix 1 – Design Principles – Version 1</p>	
<p>DBF25 – This Principle should state the proposed culvert extension will also be no smaller in diameter than the existing culvert.</p>	<p>The Applicant has updated Design Principle DBF25 (now DBF58) at Deadline 7 to add that the proposed culvert extension will also be no smaller in diameter than the existing culvert.</p>
<p>Removal of previously numbered DBF26 – this point covered the provision of syphons beneath the active travel path to connect Longbridge Roundabout to Car Park Y to ensure floodplain connectivity is maintained. It is noted this has been removed from this version of the document. The applicant</p>	<p>Design Principle DFB26 was removed from Version 4.0 of the Design Principles submitted at Deadline 5 as it was a repetition of Design Principle DLP14 (now DLP16). Design Principle DLP16 covers the requirement for culverts beneath the active travel path.</p>

<p>should set out details as to why the removal of these syphons has been proposed and be able to clearly demonstrate flood risk will not be increased as a result.</p>	
<p>DDP2 – Suggested rewording of this principle ‘Any loss of fluvial (river) floodplain and interruption to flood flow routes would be mitigated using flood compensation areas and syphons to ensure no increase in flood risk to other parties at any time during the construction phases and post project completion. The flood compensation areas and syphons will be designed for the 1 in 100 (1%) Annual Exceedance Probability (AEP) event plus a minimum of a 20% allowance for climate change as required by our guidance using the appropriate hydrology at the time of detailed design. Any updates to climate change allowances at the time of detailed design will be considered when designing fluvial mitigation and compensation’.</p>	<p>The Applicant has updated the Design Principles at Deadline 7 to reword Design Principle DDP2 to provide clarity.</p>
<p>DDP4 – Addition of the wording ‘Exceedance routes will be clearly shown on plans and an understanding of the receptors potentially impacted will be set out, as well as any mitigation measures necessary’.</p>	<p>The Applicant has updated Design Principle DDP4 at Deadline 7 to add the requested information.</p>
<p>DDP13 – Reference is made to syphons beneath ‘the noise bund’ to maintain floodplain connectivity. It would be helpful for the applicant to clarify the location of this noise bund to ensure it is clear, does this related to the western noise bund for example? As highlighted in our comment above around the now deleted DBF260 related to the active travel path syphons, further details should be given to why these have been removed and if they are to be</p>	<p>The Applicant has updated Design Principle DDP13 at Deadline 7 to clarify that this is referring to the western noise mitigation bund, under Work No. 18.</p> <p>As above, Design Principle DBF26 was removed from Version 4.0 of the Design Principles as a repetition of another Design Principle, which is retained.</p>

<p>retained, or may be retained, they should be reference under this Design Principle.</p>	
<p>DLP16 – previously DLP14. It is noted the wording of this Principle has changed from ‘should’ to ‘could’ with the addition of ‘if necessary’ in relation to the provision of culverts beneath the active travel path to maintain floodplain connectivity. Although the wording suggests culverts would still be included if required, it is not clear how this need would be determined. It is essential to maintain floodplain connectivity in this area to ensure there is no increase in flood risk. We suggest the applicant adds to this Principle to highlight how the decision of whether culverts will be required.</p>	<p>The Applicant has updated Design Principle DLP16 at Deadline 7 to add that the necessity for culverts beneath the path will be determined at detailed design.</p>
<p>Draft Development Consent Order (DCO) Version 7 June 2024 – Schedule 1</p>	
<p>Work No. 42 – Note the inclusion of the construction of a weir and fish pass as a separate point, (b), rather than being included in the overall description.</p>	<p>No response required.</p>
<p>Reference is made to provision of flood compensation works under Works 31, 38 and 39. The use of syphons/culverts under proposed taxiways, the western noise bund and the active travel path at the Longbridge roundabout have been highlighted in documents such as the FRA as they are necessary to maintain flood flow routes. However, these features do not appear to have been set out in the description of the Works within Schedule 18. For example, should reference be made to flood conveyance syphons as part of Work 18?</p>	<p>The Applicant has updated Schedule 1 of the Draft DCO (Doc Ref. 2.1) to add reference to syphons under Works Nos. 18 (Western Noise Bund), 4f (End Around Taxiway West) and 4g (End Around Taxiway East). As noted in Design Principle DLP16 in the Design Principles (Doc Ref 7.3), the provision of culverts beneath the active travel path will be determined at detailed design.</p>

Design and Access Statement Appendix 1 – Design Principles – Version 4 – Tracked	
<p>DBF25: Advisory: We still recommend a clear span bridge for this section but recognise it is outside of our remit. Given this situation, we advise a V-shaped notch in the bed of the proposed depressed/recessed invert so that if incision of the bed upstream and downstream does happen then there will still be a 2 stage section to focus water flow within the culvert during low flows.</p>	<p>Noted. This would be considered as part of the detailed design of the culvert extension.</p>
<p>DBF260: Request for further information: This statement is crossed through. Is this raised embankment no longer going to be present? Raised embankments close to watercourses can make geomorphologically changes to the watercourse through increasing the stream power and causing erosion/washing away flora and fauna.</p>	<p>Please see response above. Design Principle DBF26 was removed as repeated within another Design Principle, which is retained.</p>
<p>DDO16: Advisory: Soft/bio protection should avoid plastics where possible, unless they are beyond the bank top. This to avoid microplastics being released into the watercourse. Many coir sheeting products include strands of plastic which should be checked for.</p>	<p>Noted. This would be considered as part of detailed design.</p>
<p>DDP17: Advisory: The following statement may be better as a separate statement/entry: ‘The re-naturalised section of the River Mole will not be netted (to avoid impinging on tree growth and nature movement of the channel).’</p>	<p>The Applicant has updated the Design Principles at Deadline 7 to remove this statement from DDP17 and added it as a separate entry, under new Design Principle DDP18.</p>
<p>Design and Access Appendix 1 P32-35,DDP1-18 We would like the applicant to</p>	<p>The outline conceptual site model, Table 4.1.1, in ES Appendix 10.9.1:</p>

confirm if the potential for deicer/surface water run-off to contain PFAS been taken into account.

Preliminary Risk Assessment [[APP-138](#)] lists PFOS/PFAS as potential COCs (contaminants of concern) for all on site current and historical potential sources.

The Environment Agency is undertaking a review of PFAS at airports. In early 2024 as part of this the Environment Agency served a Regulation 61 Notice on 26 airports in England including Gatwick, with which GAL is complying.