



The Planning Inspectorate
Yr Arolygiaeth Gynllunio

SCOPING OPINION:

Proposed Gatwick Airport Northern Runway

Case Reference: TR020005

Adopted by the Planning Inspectorate (on behalf of the Secretary of State) pursuant to Regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017)

October 2019

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1. INTRODUCTION

1.1 Background

- 1.1.1 On 2 September 2019, the Planning Inspectorate (the Inspectorate) on behalf of the Secretary of State (SoS) received a scoping request from Gatwick Airport Limited (GAL) (the Applicant) under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) for the proposed Gatwick Airport Northern Runway project (the Proposed Development).
- 1.1.2 In accordance with Regulation 10 of the EIA Regulations, an Applicant may ask the SoS to state in writing its opinion *'as to the scope, and level of detail, of the information to be provided in the environmental statement'*.
- 1.1.3 This document is the Scoping Opinion (the Opinion) provided by the Inspectorate on behalf of the SoS in respect of the Proposed Development. It is made on the basis of the information provided in the Applicant's report entitled *"Our northern runway: making best use of Gatwick. Environmental Impact Assessment Scoping Report"* (the Scoping Report). The Scoping Report comprises three volumes:
- Volume 1: Main text;
 - Volume 2: Figures; and
 - Volume 3: Appendices.
- 1.1.4 This Opinion can only reflect the proposals as currently described by the Applicant. The Scoping Opinion should be read in conjunction with the Applicant's Scoping Report.
- 1.1.5 The Applicant has notified the SoS under Regulation 8(1)(b) of the EIA Regulations that they propose to provide an Environmental Statement (ES) in respect of the Proposed Development. Therefore, in accordance with Regulation 6(2)(a) of the EIA Regulations, the Proposed Development is EIA development.
- 1.1.6 Regulation 10(9) of the EIA Regulations requires that before adopting a scoping opinion the Inspectorate must take into account:
- (a) *any information provided about the proposed development;*
 - (b) *the specific characteristics of the development;*
 - (c) *the likely significant effects of the development on the environment; and*
 - (d) *in the case of a subsequent application, the environmental statement submitted with the original application.*
- 1.1.7 This Opinion has taken into account the requirements of the EIA Regulations as well as current best practice towards preparation of an ES.

- 1.1.8 The Inspectorate has consulted on the Applicant's Scoping Report and the responses received from the consultation bodies have been taken into account in adopting this Opinion (see Appendix 2).
- 1.1.9 The points addressed by the Applicant in the Scoping Report have been carefully considered and use has been made of professional judgement and experience in order to adopt this Opinion. It should be noted that when it comes to consider the ES, the Inspectorate will take account of relevant legislation and guidelines. The Inspectorate will not be precluded from requiring additional information if it is considered necessary in connection with the ES submitted with the application for a Development Consent Order (DCO).
- 1.1.10 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the Applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (eg on submission of the application) that any development identified by the Applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or Associated Development or development that does not require development consent.
- 1.1.11 Regulation 10(3) of the EIA Regulations states that a request for a scoping opinion must include:
- (a) *a plan sufficient to identify the land;*
 - (b) *a description of the proposed development, including its location and technical capacity;*
 - (c) *an explanation of the likely significant effects of the development on the environment; and*
 - (d) *such other information or representations as the person making the request may wish to provide or make.*
- 1.1.12 The Inspectorate considers that this has been provided in the Applicant's Scoping Report. The Inspectorate is satisfied that the Scoping Report encompasses the relevant aspects identified in the EIA Regulations.
- 1.1.13 In accordance with Regulation 14(3)(a), where a scoping opinion has been issued in accordance with Regulation 10 an ES accompanying an application for an order granting development consent should be based on '*the most recent scoping opinion adopted (so far as the proposed development remains materially the same as the proposed development which was subject to that opinion)*'.
- 1.1.14 The Inspectorate notes the potential need to carry out an assessment under The Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations). This assessment must be co-ordinated with the EIA in accordance with Regulation 26 of the EIA Regulations. The Applicant's ES should therefore be co-ordinated with any assessment made under the Habitats Regulations.

1.2 The Planning Inspectorate's Consultation

- 1.2.1 In accordance with Regulation 10(6) of the EIA Regulations the Inspectorate has consulted the consultation bodies before adopting a scoping opinion. A list of the consultation bodies formally consulted by the Inspectorate is provided at Appendix 1. The consultation bodies have been notified under Regulation 11(1)(a) of the duty imposed on them by Regulation 11(3) of the EIA Regulations to make information available to the Applicant relevant to the preparation of the ES. The Applicant should note that whilst the list can inform their consultation, it should not be relied upon for that purpose.
- 1.2.2 The list of respondents who replied within the statutory timeframe and whose comments have been taken into account in the preparation of this Opinion is provided, along with copies of their comments, at Appendix 2, to which the Applicant should refer in preparing their ES.
- 1.2.3 The ES submitted by the Applicant should demonstrate consideration of the points raised by the consultation bodies. It is recommended that a table is provided in the ES summarising the scoping responses from the consultation bodies and how they are, or are not, addressed in the ES.
- 1.2.4 Any consultation responses received after the statutory deadline for receipt of comments will not be taken into account within this Opinion. Late responses will be forwarded to the Applicant and will be made available on the Inspectorate's website. The Applicant should also give due consideration to those comments in preparing their ES.

1.3 Article 50 of the Treaty on European Union

- 1.3.1 The European Union (Withdrawal) Act 2018 came in to force on 26 June 2018. This provides that existing EU law will be retained in accordance with s5(2) and s(6) from the point of exit and this opinion is provided on that basis. Relevant EU Directives have been transposed into UK law and those are unchanged until amended by Parliament.

2. THE PROPOSED DEVELOPMENT

2.1 Introduction

2.1.1 The following is a summary of the information on the Proposed Development and its site and surroundings prepared by the Applicant and included in their Scoping Report. The information has not been verified and it has been assumed that the information provided reflects the existing knowledge of the Proposed Development and the potential receptors/ resources.

2.2 Description of the Proposed Development

2.2.1 The Applicant's description of the Proposed Development, its location and technical capacity (where relevant) is provided in Scoping Report at sections 1.2, 1.3 and Chapter 5.

2.2.2 Section 1.2 sets out the location of the existing Gatwick Airport site in West Sussex (between Crawley and Horley) and explains that it's two existing passenger terminals are directly served by the M23 and the London to Brighton mainline railway.

2.2.3 Chapter 4 of the Scoping Report sets out the context of the existing airport operations, including projects that are proposed (by GAL or others) or those that have already been consented.

2.2.4 The Proposed Development is to enable a higher overall number of flights at Gatwick Airport by 'optimising' the use of existing runways. The current airport operates by using a single runway (the 'main runway'). However, there is a further runway (the 'northern runway'), which is available for use when the main runway is closed. A "planning restriction with a planning agreement" has historically prevented the northern runway from being used at the same time as the main runway but this restriction expired in August 2019.

2.2.5 The Proposed Development would involve 'alterations' to the northern runway along with the lifting of the restrictions on its use to enable a 'dual runway operation' in accordance with international standards. This would result in:

- All arriving flights using the existing main runway; and
- Departing flights being split between the existing main runway and the northern runway.

2.2.6 The Applicant predicts that the Proposed Development could enable an increase of 13 million passengers per annum (mppa) by 2038 (from the 61 mppa maximum potential passenger throughput based on existing facilities (with proposed/consented projects) to 74mppa with the Proposed Development).

2.2.7 The key components of the Proposed Development are as follows (with references to relevant paragraphs in Chapter 5 of the Scoping Report where these are discussed):

- Amendments to the existing northern runway – including repositioning of its centreline (paragraphs 5.2.6 – 5.2.7);
- Reconfiguration of taxiways – including new runway exit and ‘end around’ taxiways and spurs and removal of redundant hardstanding (paragraphs 5.2.8 – 5.2.9);
- Pier and stand alterations – including a new pier (‘Pier 7’) and new stands (paragraphs 5.2.10 – 5.2.13);
- Reconfiguration of ‘*other airfield facilities*’ including hangars, cargo facilities, central airfield maintenance and recycling facilities (CARE), internal access routes and fire training ground provisions (paragraphs 5.2.14 – 5.2.36);
- Extensions to the North and South Terminals (departure lounges and baggage handling) (paragraphs 5.2.38 – 5.2.40);
- Provision of additional hotel and office spaces (paragraph 5.2.41);
- Provision of reconfigured car parking, including new surface and multi-storey car parks (MSCP) (paragraphs 5.2.42 – 5.2.43);
- Surface access improvements (including to the North and South terminal highway junctions, rail and Inter-Terminal Transit Systems (ITTS)) (paragraphs 5.2.44 – 5.2.54);
- Reconfiguration of existing utilities, including surface water, foul drainage and power (paragraphs 5.2.55 – 5.2.63); and
- Landscape/ecological planting and environmental mitigation (in accordance with GAL’s sustainability policy goals and objectives) (paragraphs 5.2.67 – 5.2.68).

2.2.8 The Proposed Development is primarily located within Crawley District and West Sussex County Councils. There are also elements within Surrey County Council and the districts of Mole Valley, Reigate and Banstead and Tandridge. The relevant local authority boundaries are shown of Figure 1.2.2 of the Scoping Report.

2.2.9 The Proposed Development includes alterations to the existing northern runway to enable dual runway operations, and corresponding reconfiguration to the taxiway system and parking stands to accommodate more aircraft movements. Along with the other elements listed above the Proposed Development will enable increased capacity so that more passengers can access the airport efficiently, with good levels of customer service and so that environmental effects are mitigated.

2.2.10 Paragraphs 5.2.71 – 5.2.72 explain that the airport would remain operational on a 24-hour, seven days per week basis, and that night-time restrictions between 23.00 to 07.00 in accordance with a DfT Noise Restrictions Notice¹ are “*assumed to remain the case with the Project in place*”.

¹ Although not referenced by the Applicant, the Inspectorate understands the restrictions are those set out in the ‘*Night flight restrictions at Heathrow, Gatwick and Stansted: decision document (2017)*’, to

2.3 The Planning Inspectorate's Comments

Description of the Proposed Development

- 2.3.1 The ES should include a description of:
- The Proposed Development comprising at least the information on the site, design, size and other relevant features of the development; and
 - The location of the development and description of the physical characteristics of the whole development, including any requisite demolition works and the land-use requirements during construction and operation phases
- 2.3.2 Due to the ongoing nature of the design the Proposed Development at this stage, the Scoping Report lacks specific information on the characteristics of elements to the Proposed Development e.g. specific dimensions of proposed structures including layout and design capacities of the terminal extensions, piers, hotels and office blocks, autonomous vehicle routes and the number of parking spaces associated with each plot. These should be specifically set out in the description of the Proposed Development in the ES.
- 2.3.3 The Scoping Report makes reference to the relocation of the CARE facility (as part of the reconfiguration of 'other airfield facilities'), which includes an additional biomass boiler with flue heights of up to approximately 50m above ground level. Limited detailed information is provided as to the specifications of this plant including the type of waste managed, the throughput, methods of processing and relevant outputs. These parameters will need to be fully defined in the ES.
- 2.3.4 Figures 5.2.1(a-g) illustrate the broad location of some of the key elements of the Proposed Development. The Inspectorate would expect to see specific reference in the ES as to how each of these elements are to be delivered within the DCO and to relevant design detail. There is some ambiguity with regards to whether existing airport structures will be removed in order to make way for the Proposed Development or how elements would co-exist. For example, the South Terminal the office site is shown as also being the location for a hotel and a multi-storey car park, while at the North Terminal, the hotel site is also identified as a construction compound, multi-storey car park and a location for underground water storage.
- 2.3.5 The Inspectorate acknowledges that, at this point in the evolution of the Proposed Development, a final description may not yet be confirmed, and that there are currently different options for certain works. However, the Applicant should be aware that the description of the Proposed Development provided in the ES must be sufficiently certain to meet the requirements of the EIA Regulations. The ES must include a detailed description of all components of the

Proposed Development and should include reference to the location, alignments and dimensions of each individual element, including maximum heights, design parameters and Limits of Deviation (LoD) (if required). Where appropriate this information should be accompanied by figures to assist the reader (and cross referred to appropriate DCO works plans).

- 2.3.6 There is limited information in the Scoping Report relevant to the North and South terminal junction access improvements. Solutions “up to and including grade separation” for both junctions (and “other enhancement works” in the case of the North terminal junction) have been assumed for the purposes of the Scoping Report, although both remain subject to detailed assessment work and discussion with Highways England and the local highway authorities. Given the lack of detail in this regard it is difficult for the Inspectorate to provide meaningful comments on the scope of the assessment at this stage.
- 2.3.7 The Scoping Report indicates that the North terminal junction improvements could result in land take from the Riverside Garden Park. The ES should include a quantification of the total temporary and permanent land take affected by the Proposed Development and a description of any proposed mitigation by relevant ES aspect chapter.
- 2.3.8 The Scoping Report refers to a “satellite Airport Fire Service” (AFS) facility but fails to describe where any such a facility will be located. The ES should describe any such facility (if required) and clearly explain its proposed location.
- 2.3.9 Sections 4.3 and 4.4 of the Scoping Report describe the “Proposed/Consented Projects” and “Projects Undertaken by Others”. The description of the Proposed Development in the ES should explain the Proposed Developments relationship to other projects. Further comments in this regard are provided in section 3.3 of this Scoping Opinion (in terms of assessing the Proposed Development against a ‘future baseline’).
- 2.3.10 The Scoping Report identifies the potential need for additional foul water treatment capacity in the form of a new wastewater treatment facility either within the airport boundary or adjacent to the existing Crawley Sewage Treatment Works on land owned by the Applicant (where there is not sufficient capacity within the existing Thames Water Treatment Works or that improvements cannot be made to provide additional capacity). The Scoping Report does not clearly explain if / how any of these options would form part of the Proposed Development. Regardless, the potential significant effects resulting from the development of such facilities should be assessed within the ES where they are necessary for the delivery of the Proposed Development.

Alternatives

- 2.3.11 The EIA Regulations require that the Applicant provide ‘A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects’.

- 2.3.12 The Inspectorate acknowledges the Applicant's intention to consider alternatives within the ES, as set out in Chapter 3 of the Scoping Report. The Inspectorate would expect to see a discrete section in the ES that provides details of the reasonable alternatives studied and the reasoning for the selection of the chosen option(s), including a comparison of the environmental effects. This should specifically address all of the scenarios presented by the Applicant in the Scoping Report.
- 2.3.13 The ES should also give consideration to the prospect of a 'no development' and 'no growth scenario' for comparative purposes and in support of the justification for the Proposed Development in the form that is to be presented in the DCO application.

Flexibility

- 2.3.14 The Inspectorate notes the Applicant's desire to incorporate flexibility into their draft DCO (dDCO) and its intention to apply a Rochdale Envelope approach for this purpose where required (paragraph 6.2.35) and welcomes the reference to Planning Inspectorate Advice Note nine 'Using the 'Rochdale Envelope' in this regard. Where the details of the Proposed Development cannot be defined precisely, the Applicant will apply a worst case scenario.
- 2.3.15 The Applicant should make every attempt to narrow the range of options and explain clearly in the ES which elements of the Proposed Development have yet to be finalised and provide the reasons. At the time of application, any Proposed Development parameters should not be so wide-ranging as to represent effectively different developments. The development parameters will need to be clearly defined in the dDCO and in the accompanying ES. It is a matter for the Applicant, in preparing an ES, to consider whether it is possible to robustly assess a range of impacts resulting from a large number of undecided parameters. The description of the Proposed Development in the ES must not be so wide that it is insufficiently certain to comply with the requirements of Regulation 14 of the EIA Regulations.
- 2.3.16 It should be noted that if the Proposed Development materially changes prior to submission of the DCO application, the Applicant may wish to consider requesting a new scoping opinion.

Airspace Change Process

- 2.3.17 Section 8.7 of the Scoping Report makes reference to an ongoing review of the airspace over London and the south east of England, with an aim to address existing constraints and allow for future growth in air transport through an Airspace Change Process, referred to as the Future Airspace Strategy Implementation (FASI) South (in line with the CAA's airspace change process document (CAP1616²)).

² Civil Aviation Authority (2018) *Airspace Design: Guidance on the regulatory process for changing airspace design including community engagement requirements*. Available from: <https://publicapps.caa.co.uk/cap1616>

- 2.3.18 The Applicant states that the timing of the process is such that any updated flightpaths “*would not be available within the timeframe of the EIA process for the Project*”, and that the assessment will be undertaken based on current flightpath information and information held by the Applicant. The Applicant is also of the view that the FASI South airspace changes lie outside of the scope of the Proposed Development, but that should information become available for the purposes of the assessment, this would be reviewed, and consideration given to how the proposed changes could affect the conclusions in the ES.
- 2.3.19 The Inspectorate also notes the assertion in the Scoping Report that a separate airspace change to enable dual runway operations is “unlikely to be required”, but that they will submit a Statement of Need within the scope of the CAP1616 process “at the appropriate time”.
- 2.3.20 Section 8.7 of the Scoping Report seeks to scope out the Airspace Change Process entirely from the ES. The Inspectorate does not consider that the Airspace Change Process is, in itself, an aspect or matter that can be scoped out from the ES. Instead, the Inspectorate considers that the ES methodology should be compatible with the methodological approaches outlined in the CAA’s CAP 1616 and CAP 1616a³ documents to ensure consistency and continuity between the Proposed Development and Airspace Change process assessments. The ES should explain how the methodologies used for the assessment of the Proposed Development are compatible with the CAP methodologies.

³ Civil Aviation Authority (2018) *Airspace Design: Environmental requirements technical annex*. Available from: <https://publicapps.caa.co.uk/cap1616a>

3. ES APPROACH

3.1 Introduction

- 3.1.1 This section contains the Inspectorate's specific comments on the scope and level of detail of information to be provided in the Applicant's ES. General advice on the presentation of an ES is provided in the Inspectorate's Advice Note Seven 'Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements'⁴ and associated appendices.
- 3.1.2 Aspects/ matters (as defined in Advice Note Seven) are not scoped out unless specifically addressed and justified by the Applicant, and confirmed as being scoped out by the Inspectorate. The ES should be based on the Scoping Opinion in so far as the Proposed Development remains materially the same as the Proposed Development described in the Applicant's Scoping Report.
- 3.1.3 The Inspectorate has set out in this Opinion where it has/ has not agreed to scope out certain aspects/ matters on the basis of the information available at this time. The Inspectorate is content that the receipt of a Scoping Opinion should not prevent the Applicant from subsequently agreeing with the relevant consultees to scope such aspects/ matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects/ matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.
- 3.1.4 Where relevant, the ES should provide reference to how the delivery of measures proposed to prevent/ minimise adverse effects is secured through DCO requirements (or other suitably robust methods) and whether relevant consultees agree on the adequacy of the measures proposed.

3.2 Relevant National Policy Statements (NPSs)

- 3.2.1 Sector-specific NPSs are produced by the relevant Government Departments and set out national policy for NSIPs. They provide the framework within which the Examining Authority (ExA) will make their recommendation to the SoS and include the Government's objectives for the development of NSIPs. The NPSs may include environmental requirements for NSIPs, which Applicants should address within their ES.
- 3.2.2 Section 2.2 of the Applicant's Scoping Report acknowledges that there is no specific NPS for the Proposed Development. On the basis of the current information, the Inspectorate understands that s.105 of the PA2008 would be applicable and that the SoS (in deciding the application) must have regard to any other matters that "*are both important and relevant*" to their decision, which

⁴ Advice Note Seven: Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements and annex. Available from: <https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>

may include the National Planning Policy Framework (NPPF) and relevant local development plans and policies.

3.2.3 However, the Applicant's view is that the Airports NPS⁵ is a relevant consideration for the Proposed Development as, although it sets out the primary policy for decision-making in relation to the proposed new runway at Heathrow Airport. The Airports NPS itself also explains at paragraph 1.12 that it '*will be an important and relevant consideration in respect of applications for new runway capacity and other airport infrastructure in London and the South east of England.*'

3.2.4 Paragraph 1.5.3 of the Scoping Report states that, at this stage the Proposed Development may include works that constitute a Highways NSIP (under s.22 of the PA2008) in their own right. The Applicant therefore also considers that the NPS for National Networks (NPSNN)⁶ is of relevance to the Proposed Development.

3.3 Scope of Assessment

General

3.3.1 The Inspectorate recommends that in order to assist the decision-making process, the Applicant uses tables:

- to demonstrate how the assessment has taken account of this Opinion;
- to identify and collate the residual effects after mitigation for each of the aspect chapters, including the relevant interrelationships and cumulative effects;
- to set out the proposed mitigation and/ or monitoring measures including cross-reference to the means of securing such measures (eg a dDCO requirement);
- to describe any remedial measures that are identified as being necessary following monitoring; and
- to identify where details are contained in the Habitats Regulations Assessment (HRA report) (where relevant), such as descriptions of European sites and their locations, together with any mitigation or compensation measures, are to be found in the ES.

3.3.2 The Inspectorate considers that where a DCO application includes works described as 'Associated Development', that could themselves be defined as an improvement of a highway, the Applicant should ensure that the ES accompanying that application distinguishes between; effects that primarily derive from the integral works which form the proposed (or part of the

⁵ *Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England* (June 2018) <https://www.gov.uk/government/publications/airports-national-policy-statement>

⁶ National policy statement for national networks (December 2014) <https://www.gov.uk/government/publications/national-policy-statement-for-national-networks>

proposed) NSIP and those that primarily derive from the works described as Associated Development. This could be presented in a suitably compiled summary table. This will have the benefit of giving greater confidence to the Inspectorate that what is proposed is not in fact an additional NSIP defined in accordance with s.22 of the PA2008.

Baseline Scenario

- 3.3.3 The ES should include a description of the baseline scenario with and without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.
- 3.3.4 The Inspectorate notes the complexities around the definition of future baseline conditions as set out in Section 6.2 of the Scoping Report and the implications of the assumed opening date of Heathrow's third runway in (currently estimated to be 2026). The various aspect chapters will consider other factors relevant to identification of future baseline conditions in their respective assessments, and the Inspectorate would expect to see the introductory or concluding chapters of the ES to set out a holistic summary of the various scenarios considered.
- 3.3.5 Sections 4.3 and 4.4 of the Scoping Report describe the "Proposed/Consented Projects" and "Projects Undertaken by Others". Some information on the proposed and consented projects that would "proceed in the short term" is provided, but no reference is made to any longer-term actions needed to facilitate the anticipated growth. The description of the Proposed Development in the ES should explain the Proposed Development's spatial and temporal relationship to other projects. The ES should be clear in stating which works have been assessed and whether they form part of the DCO application or whether certain assumptions or reliance is otherwise placed on their delivery. Where these works do not specifically form part of the DCO application, the ES should ensure that they are adequately assessed as part of the baseline (and future baseline) conditions or within the cumulative effects assessment where significant effects are likely to occur.
- 3.3.6 The ES should clearly define the 'future baseline', explaining any assumptions made in relation to the growth in passenger numbers (and the physical airport itself) in the absence of the Proposed Development (paragraphs 3.2.4 – 3.2.6 of the Scoping Report). The extent to which the parameters in Table 4.6.1 are associated with or reliant upon other consents and assumptions are not fully explained. In particular the ES should set out what (if any) additional consents are required to enable this growth since, it is unclear if any specific additional consents (beyond those listed in section 4.3 of the Scoping Report) would be required to allow for increased passenger numbers from 46 mppa to 61 mppa as outlined in table 4.6.1 of the Scoping Report.
- 3.3.7 The Applicant should be careful to ensure that the 'future baseline' is established relevant to suitably robust assumptions and is fully representative of the likely outcomes in the absence of the Proposed Development.

Forecasting Methods or Evidence

- 3.3.8 The ES should present the timescales upon which the surveys which underpin the technical assessments have been based. For clarity, this information should be provided either in the introductory chapters of the ES (with confirmation that these timescales apply to all chapters), or in each aspect chapter.
- 3.3.9 Where relevant, Zones of Influence (ZoI) of the Proposed Development should be described to determine the extent of study areas and receptors which have the potential to be affected. Study areas should be defined with regard to relevant aspect specific guidance and where arbitrary distances or professional judgement is relied upon in defining them, this should be explained, and justification provided (including reference to agreement with relevant consultation bodies).
- 3.3.10 The Inspectorate expects the ES to include a chapter setting out the overarching methodology for the assessment, which clearly distinguishes effects that are 'significant' from 'non-significant' effects (the Scoping Report does not define the level(s) of effect that would be determined as 'significant'). Any departure from that overarching methodology in applying these definitions should be described in the individual aspect assessment chapters as relevant.
- 3.3.11 The Inspectorate is also of the view that the assessment matrix terminology (as presented in table 6.2.3 of the Scoping Report) has the potential to cause confusion with many of the outcomes presented in Table 6.2.3 being "either or" between two descriptors of effect significance despite identical receptor sensitivity and magnitude of change inputs. The aspect chapters will need to carefully present how the reported levels of significance are derived (in a general sense and on a receptor-by-receptor basis) where the matrix based approach leads to a judgement as to the outcome between two potential descriptors.
- 3.3.12 The ES should include details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.
- 3.3.13 Paragraphs 6.2.9 – 6.2.12 of the Scoping Report outline the approach to the "assessment years" covering the construction phase, first full year of opening, interim assessment and 'design year' (completion of the Proposed Development). The extent to which take each of these account for variability in the potential opening date of Heathrow's third runway should be clearly set out and assessed (using sensitivity analysis where relevant).
- 3.3.14 In terms of the phasing of the Proposed Development itself, Table 5.3.1 suggests work on the new pier won't take place until 2032-34, whereas paragraph 7.6.57 suggests that the peak slots on the new runway are likely to have been filled by 2029. The ES should include a detailed phasing plan against which aspect chapters have based their assessment, and it should describe how the predicted rates of growth in air traffic movements (ATMs) fit in with the demand and delivery of the various components of the Proposed Development (and any interdependences in this regard).

- 3.3.15 The propose phasing of construction phasing is presented section 5.3 and table 5.2.1 of the Scoping Report. The Inspectorate understands that construction works could continue for a duration of up to 13 years (inclusive of preliminary works). Having regard to the anticipated length of the construction phase the Applicant should ensure that the ES clearly explains what constitutes a 'temporary' effect. The ES should explain this with regards to the duration of effect and the proposed construction phasing.

Residues and Emissions

- 3.3.16 The EIA Regulations require an estimate, by type and quantity, of expected residues and emissions. Specific reference should be made to water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases, where relevant. This information should be provided in a clear and consistent fashion and may be integrated into the relevant aspect assessments.
- 3.3.17 The Applicant's air quality assessment should take into account any proposals from relevant Environment Act 1995 Directions and how this may affect the Proposed Development during both construction and operation.

Mitigation

- 3.3.18 Any mitigation relied upon for the purposes of the assessment should be explained in detail within the ES. The likely efficacy of the mitigation proposed should be explained with reference to residual effects. The ES should also address how any mitigation proposed is secured, with reference to specific DCO requirements or other legally binding agreements.
- 3.3.19 The Inspectorate notes that the Scoping Report identifies a number of areas defined as "*Potential Environmental Mitigation and Enhancement Areas*", as shown on Figure 5.2.1(g). Figure 5.21(a) also has a feature labelled "*Environmental Bund*" (associated with the existing / consented elements). The specific role and function of identified mitigation measures should be clearly presented within the ES and relevant aspect chapters. The description of mitigation proposed and relied upon in the ES should be specific and should distinguish between mitigation measures proposed to address significant effects from the Proposed Development and any proposed enhancement measures.
- 3.3.20 In particular, it is unclear what is proposed or achievable by way of mitigation and enhancement at Riverside Garden Park, and the ES will need to clearly set this out such that any reliance placed upon conclusions in the ES can be understood (including where 'mitigation' has effectively been incorporated into the design of the Proposed Development).
- 3.3.21 There are other references in the Scoping Report to the preparation of an earthworks strategy, a lighting strategy and surface water drainage strategy and for the avoidance of doubt, these (and other such plans including the Code of Construction Practice (CoCP) should be included as part of the Application documents. Such plans should be sufficiently detailed, and cross referred to as part of the ES such that the reliance placed upon them as mitigation throughout the aspect chapters can be understood.

Risks of Major Accidents and/or Disasters

- 3.3.22 The ES should include a description and assessment (where relevant) of the likely significant effects resulting from accidents and disasters applicable to the Proposed Development. The Applicant should make use of appropriate guidance (e.g. that referenced in the Health and Safety Executives (HSE) Annex to Advice Note 11) to better understand the likelihood of an occurrence and the Proposed Development's susceptibility to potential major accidents and hazards. The description and assessment should consider the vulnerability of the Proposed Development to a potential accident or disaster and also the Proposed Development's potential to cause an accident or disaster. The assessment should specifically assess significant effects resulting from the risks to human health, cultural heritage or the environment. Any measures that will be employed to prevent and control significant effects should be presented in the ES.
- 3.3.23 Relevant information available and obtained through risk assessments pursuant to European Union legislation such as Directive 2012/18/EU of the European Parliament and of the Council or Council Directive 2009/71/Euratom or relevant assessments carried out pursuant to national legislation may be used for this purpose provided that the requirements of this Directive are met. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies.
- 3.3.24 Major accidents and disasters are considered further in section 4.14 of this Scoping Opinion.

Climate and Climate Change

- 3.3.25 The ES should include a description and assessment (where relevant) of the likely significant effects the Proposed Development has on climate (for example having regard to the nature and magnitude of greenhouse gas (GHG) emissions) and the vulnerability of the project to climate change. Where relevant, the ES should describe and assess the adaptive capacity that has been incorporated into the design of the Proposed Development. This may include, for example, alternative measures such as changes in the use of materials or construction and design techniques that will be more resilient to risks from climate change.
- 3.3.26 Further comments on climate change are provided in section 4.9 of this Scoping Opinion.

Transboundary Effects

- 3.3.27 Schedule 4 Part 5 of the EIA Regulations requires a description of the likely significant transboundary effects to be provided in an ES. The Scoping Report has not indicated whether the Proposed Development is likely to have significant impacts on another European Economic Area (EEA) State.
- 3.3.28 Regulation 32 of the EIA Regulations inter alia requires the Inspectorate to publicise a DCO application on behalf of the SoS if it is of the view that the

proposal is likely to have significant effects on the environment of another EEA state, and where relevant, to consult with the EEA state affected.

- 3.3.29 The Inspectorate considers that where Regulation 32 applies, this is likely to have implications for the examination of a DCO application. The Inspectorate recommends that the ES should identify whether the Proposed Development has the potential for significant transboundary impacts and if so, what these are and which EEA States would be affected.
- 3.3.30 Section 7.16 of the Scoping Report (and appendix 7.16), conclude that the Proposed Development is not likely to have significant effects on another European Economic Area (EEA) State and proposes that transboundary effects do not need to be considered within the ES.
- 3.3.31 The Inspectorate notes the Applicant's conclusion in the Scoping Report regarding transboundary effects and recommends that, for the avoidance of doubt, the ES details and justifies this conclusion.

A Reference List

- 3.3.32 A reference list detailing the sources used for the descriptions and assessments must be included in the ES.

3.4 Confidential Information

- 3.4.1 In some circumstances it will be appropriate for information to be kept confidential. In particular, this may relate to information about the presence and locations of rare or sensitive species such as badgers, rare birds and plants where disturbance, damage, persecution or commercial exploitation may result from publication of the information. Where documents are intended to remain confidential the Applicant should provide these as separate paper and electronic documents with their confidential nature clearly indicated in the title, and watermarked as such on each page. The information should not be incorporated within other documents that are intended for publication or which the Inspectorate would be required to disclose under the Environmental Information Regulations 2004.

4. ASPECT BASED SCOPING TABLES

4.1 Historic Environment

(Scoping Report section 7.1)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.1.1	7.1.21, 7.1.28, 7.1.39	Designated heritage assets located within urbanised areas of Horley and Crawley	<p>The Scoping Report does not clearly define which 'urbanised areas' are proposed to be scoped out of the ES. The Inspectorate notes that both Horley and Crawley lie within the 3km study area proposed for heritage assets. Further, this 3km study area seems to conflict with the 5km study area proposed in the landscape assessment without justification as to why these are different. The Inspectorate considers that there may be impacts to the settings of heritage assets from the Proposed Development including those from increases in airborne noise.</p> <p>The Inspectorate does not agree to scope such matters out and expects that the ES should include an assessment of likely significant effects on such receptors particularly where airborne noise would affect the setting. The ES should also assess potential effects associated with the provision of noise insulation or ventilation measures within heritage assets throughout the study area and where this would be required. The Applicant should make effort to agree the relevant receptors for the assessment with relevant consultation bodies.</p>
4.1.2	7.1.40	Effects on buried archaeological remains, operational period	<p>The Inspectorate agrees to scope out and assessment of effects on buried archaeology during the operational period as significant effects are unlikely to occur and the significant effects from groundworks during the construction phase will be assessed.</p>

ID	Ref	Other points	Inspectorate's comments
4.1.3	7.1.2	Guidance Documents	The assessment in the ES should have regard to relevant guidance documents including: Sussex Archaeological Standards (2019), and non-statutory local archaeological standards used in providing development management advice by East Sussex County Council and West Sussex County Council.
4.1.4	7.1.18	Proposed scope of baseline studies	The Inspectorate recommends that the data used to inform the detailed Historic Environment Desk Based Assessment (DBA) should include full summaries of the findings of the two archaeological investigations by the Applicant for the New Pollution Lagoon (Fig. 7.5.1) and Flood Alleviation Reservoir, including the Late Iron Age cremation cemetery, (to the south of Crawley Sewage Works). The Historic Environment DBA should also include an appraisal of the geoarchaeological potential of the site in relation to the Proposed Development.
4.1.5	7.1.26	Study area for archaeological element	The Scoping Report proposes a 1km study area for the archaeological element of the desk-based assessment but does not explain why this is relevant having regard to the extent of the impacts from the Proposed Development. The Inspectorate is concerned this may not be sufficient to address the full extent of impacts likely to result in significant effects. The Inspectorate recommends that the study area is established relevant to the extent of the impacts and that effort is made to agree the approach with relevant consultation bodies.
4.1.6	7.1.27, Figure 7.1.1	Study area for heritage assets	The Scoping Report proposes that the study area for designated heritage assets will be 3km, but that some heritage assets outside of a 3km study area may need to be considered including those with designed views towards the airport, or those which have a particular iconic status. The Applicant should also consider the inclusion of non-designated heritage assets in the assessment.

ID	Ref	Other points	Inspectorate's comments
			<p>The Inspectorate acknowledges the commitment made in the Scoping Report to identifying relevant heritage assets with relevant consultation bodies and recommends that this be agreed at an early stage in the assessment. The Applicant should cross refer to the finalised ZTV of the Proposed Development to assist with the identification of relevant assets.</p> <p>The locations of all heritage assets considered in the assessment should be shown on appropriate figures with cross referencing by number or label to the relevant data in the text or tables. Data sources should be stated.</p>
4.1.7	7.1.28 and 7.1.22	Study area for potential airborne noise impacts on tranquillity of heritage assets	<p>The Applicant should make effort to agree the study area with relevant consultation bodies having regard to the findings of other relevant aspects and matters e.g. the noise assessment and the study area used for the assessment of tranquillity effects in the Landscape, Townscape and Visual Resources assessment.</p> <p>In this regard, the Inspectorate notes that tranquillity mapping produced by the Campaign to Protect Rural England (CPRE) as referred to by the Applicant at paragraph 7.1.22 is not a predictive tool and it's publication dates back to 2007. The extent to which this mapping informs the baseline assessment alongside other methodological guidance should be made clear.</p>
4.1.8	7.1.29, Table 7.1.1	Potential effects to be considered	<p>The assessment of impacts to built heritage and historic areas during the construction phase should also include the assessment of potential significant effects resulting from vibration.</p> <p>The assessment of construction, demolition and operational impacts should include settlement level / conservation area impacts at Charlwood due to its concentration of assets and its proximity to the airport, in particular to the repositioned northern runway. Impacts to the conservation area of Horley should also be considered.</p>

ID	Ref	Other points	Inspectorate's comments
			<p>Effects on the settings of heritage assets should be assessed in accordance with The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Historic England, 2017).</p> <p>Effects from road traffic associated with the Proposed Development on heritage assets should also be included in the assessment.</p>
4.1.9	7.1.31	Potential for buried archaeological remains	<p>The Scoping Report summarises the areas which may require archaeological investigation. The Inspectorate does not regard the summary in the text at 7.1.31 as definitive and expects that the Applicant will make efforts to agree the detailed scope and extent of the proposed investigations with relevant consultation bodies. The Inspectorate notes that in Chapter 5, a number of instances are cited where the Proposed Development may extend significantly below ground level (5.2.18, 5.2.20, 5.2.22, 5.2.28, 5.2.62) and draws attention that even where land is previously disturbed, archaeological investigation may be required if the proposed excavation is below ground levels previously disturbed. Deeper deposits of potential geoarchaeological and palaeoenvironmental significance (e.g. late glacial channel deposits, alluvial deposits) may also survive below areas of previous heavy ground disturbance. The Applicant should make effort to agree the approach to assessing impacts on archaeological deposits with relevant consultation bodies.</p>
4.1.10	7.1.33, 7.1.38	Mitigation measures	<p>The Applicant's intention is that a Written Schemes of Investigation will be agreed in advance with relevant consultation bodies. Where archaeological mitigation measures are proposed to be undertaken following the grant of the DCO, such measures should be appropriately secured. The Applicant should also make effort to agree the approach to the reporting of results and/or publication in relevant journal/s, with relevant consultation bodies.</p>

ID	Ref	Other points	Inspectorate's comments
			The Inspectorate considers that the Applicant's approach to mitigation should emphasise the need to preserve heritage assets in-situ, where possible and appropriate.

4.2 Landscape, Townscape and Visual Resources

(Scoping Report section 7.2)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.2.1	7.2.32, 7.2.33	Extent of study area	<p>The Applicant proposes to limit the assessment of landscape, townscape and visual impacts to those receptors within a 5 km radius of the Project site boundary, with the exception of the assessment of impacts to tranquillity.</p> <p>The Inspectorate notes that there may be a need to prepare a revised ZTV when the description of development is fixed and so determination of a 5km study area at this stage may be premature. (eg to account for a 50m stack associated with the CARE facility at a yet to be defined location).</p> <p>The ES should clearly evidence and justify the final extent of the study area used in the assessment of landscape and visual impacts, having regard to the ZTV. The study area should be sufficient to ensure that all impacts with the potential to result in a likely significant effect on any component of landscape and visual resource should be assessed. The Applicant should make effort to agree the study area with relevant consultation bodies.</p> <p>The visual effects of overflying aircraft may affect visitors to heritage sites and historic parks and gardens, some distance from the Proposed Development, and the Applicant should consider the potential for significant effects to such receptors outside of the study area and notes the inter-relationship between landscape and historic environment aspect chapters in this regard.</p>
4.2.2	7.2.34	Extent of tranquillity study area	The Inspectorate agrees that the extent of the tranquillity study area should be defined according to the guidance in CAA CAP1616 but

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			<p>paragraph B30 of that guidance states that elevated areas will extend the study area as account must be taken of the elevation (height) of the specific surface level involved when developing airspace change proposals the height of the terrain directly beneath airspace may be higher than mean sea level, thereby resulting in aircraft being less than 7,000 feet above that particular geographic area. The Inspectorate expects that the Applicant will confirm that this requirement has been reflected in the assessment and provide details of any geographic areas where such adjustment has been necessary, including in respect of any locally or nationally designated landscape areas.</p>
4.2.3	7.2.35	Seascape effects	<p>The Inspectorate agrees that seascape effects may be scoped out of the assessment as significant effects are unlikely having regard to the distance from coast of the Proposed Development.</p>

ID	Ref	Other points	Inspectorate's comments
4.2.4	7.2.2	Guidance documents	<p>The Applicant's assessment should make use of relevant guidance documents including: Landscape Institute Technical Guidance Note 06/19, Visual Representation of Development Proposals; 'An Approach to Landscape Character Assessment' (Christine Tudor, Natural England, October 2014).</p>
4.2.5	7.2.4	ZTV	<p>The ZTV presented in the ES should be established relevant to the maximum parameters of all elements of the Proposed Development, including any flue for the biomass boiler. A clear methodology and statement of any assumptions made should be provided for the production of the proposed ZTV. The Applicant should seek to agree</p>

ID	Ref	Other points	Inspectorate's comments
			the methodology for preparing the ZTV with relevant consultation bodies.
4.2.6	7.2.2, 7.2.28, 7.2.29	Methodology	The Inspectorate notes that the assessment will be undertaken with reference to published guidance including the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition. The Applicant should ensure that the ES clearly explains the approach and methodology adopted for the assessment. The assessment methodology should be based on clearly defined criteria to enable full justification of the judgements made in respect of sensitivity, magnitude and significance of effects.
4.2.7	7.2.11 – 7.2.17	Baseline studies	The ES should clearly describe that studies and surveys undertaken to inform the final baseline information, including the timing of any site visit and how / if professional judgement has been applied. The Applicant should make effort to agree its approach with the relevant consultation bodies.
4.2.8	7.2.16	Representative viewpoints and visualisations	<p>The Inspectorate agrees that representative viewpoints in the ES should include both close and distant views. The ES should include relevant representative viewpoints from within the High Weald AONB, which lies approximately 3km to the south east of the Proposed Development, and relevant viewpoints within the North Downs/Surrey Hills AONB. Impacts on other important viewpoints including those identified in relevant local policies should be assessed e.g. Policy CH8 of the adopted Crawley Borough Local Plan; from Tilgate Park, Junction 11 with A23/A264 and Target Hill. The Applicant should confirm the relevance of designated landscapes and viewpoints identified in local plan through site visits.</p> <p>The ES should include photographic visualisations of both the baseline view and the view incorporating the Proposed Development, which should be numbered and cross-referenced to accurately plotted</p>

ID	Ref	Other points	Inspectorate's comments
			locations on an OS map of appropriate scale, which should also show the angles of the views.
4.2.9	7.2.22	Tranquillity study area	<p>The spatial extent of the tranquillity study area should be shown in relation to nationally designated landscape areas and defined with regard to orientation and frequency of aircraft movements associated with the Proposed Development.</p> <p>The Inspectorate expects that the assessment of effects on tranquillity should include the likely effects on users of public rights of way and residents, both in daytime and night-time, including in the South Downs National Park International Dark Skies Reserve, and visitors to heritage assets and historic parks and gardens.</p>
4.2.10	7.2.24, Table 7.2.1	Potential effects	<p>The Scoping Report indicates that the design of the Proposed Development is not yet fixed and therefore the potential effects outlined at Table 7.2.1 cannot be regarded as determinative at this stage. The Applicant should ensure that the ES assesses all the relevant impacts likely to result in significant effects from the Proposed Development. accurately identifies a</p> <p>The Applicant should confirm whether any elements of the proposed development would give rise to visible plumes, and if so, include an assessment of any likely significant effects associated.</p> <p>If the Applicant intends to prepare a Residential Visual Amenity Assessment the Inspectorate expects that it should form part of the landscape and visual impact assessment aspect chapter in the ES. The Inspectorate draws attention to Landscape Institute Technical Guidance Note 02/2019 on Residential Visual Amenity Assessment published in March 2019. Where no such assessment is proposed, the ES should set out clearly why it is not deemed to be necessary.</p>

ID	Ref	Other points	Inspectorate's comments
4.2.11	7.2.26, 7.2.28, 7.2.31	Assessment years and mitigation	<p>The Scoping Report defines the assessment years as; construction, 2022-2034; airfield first full year of opening, 2026; interim assessment year, 2029 and the design year, 2038. The ES should clearly describe the mitigation measures proposed to be implemented in conjunction with the assessment years. Appropriate period or periods of establishment for phases or elements of mitigation planting should be taken into account in the assessment of residual effects, and the years adopted for the assessment of residual effects for each phase of development should be clearly stated. Assumptions made on the height that mitigation planting will reach at each assessment year should be stated and reflected in the visualisations produced. Measures for the implementation and phasing of mitigation planting, including any advance planting, and the retention of existing planting, should be secured through the DCO.</p>
4.2.12	7.2.27, 7.11.55	Lighting	<p>The Inspectorate notes the Applicant's proposed approach to the assessment of lighting impact and considers that the assessment should demonstrate the regard given to with The Guidance Notes for the Reduction of Obtrusive Light, Institution of Lighting Professionals (2011).</p>

4.3 Ecology and Nature Conservation

(Scoping Report section 7.3)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.3.1	7.3.4 to 7.3.24	Wintering Birds, amphibians and terrestrial mammals	The Scoping Report includes no evidence relating to wintering birds, amphibians and terrestrial mammals. For the avoidance of doubt the ES should assess the impacts to these ecological receptors where a likely significant effect could occur.
4.3.2	7.3.46	Effects of dust or changes in water quality at European Designated sites	The Scoping Report does not provide information demonstrating an absence of hydrological pathways from the Proposed Development to European Designated sites. In absence of such information the Inspectorate cannot agree to scope this matter out. The ES should include an assessment of the impacts from dust or changes in water quality at European Designated sites where significant effects are likely to occur.
4.3.3	7.3.33	Biodiversity Opportunity Areas (BOAs) and Sites of Nature Conservation Importance (SNCIs)	BOAs and SNCIs are not listed as locally designated sites to be included in the ES assessment. The ES should include these sites as potential ecological receptors in the assessment of significant effects.
4.3.4	Table 7.3.1	Impacts from changing flows of watercourses and drainage	The ES should include an assessment of the potential impacts to ecology from changes in watercourse flows and drainage systems during the construction and operation of the Proposed Development. The Inspectorate recognises the degree of overlap between the ecological and hydrological assessment in this regard and therefore that there will need to be a degree of overlap and cross referencing between these aspects.
4.3.5	7.3.24 and 7.3.34	Effects on fish species	It remains unclear whether fish species are scoped in or out of the ES as the Scoping Report determines that fish surveys are only to be

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			undertaken should the Proposed Development warrant direct works or changes to watercourses. The ES should scope fish species in to the assessment and assess both indirect impacts and direct impacts on such species; this should cross refer to other assessments in the ES such as the Water Environment.
4.3.6	7.3.33, Figures 5.2.1e and 7.3.2	Ancient and Veteran trees and ancient woodland	<p>The Scoping Report omits ancient and veteran trees as sensitive habitats that should be assessed. However, the Scoping Report does not provide evidence to suggest they are not present within the study area.</p> <p>Figures 5.2.1(e and f) indicate potential areas for flood compensation and construction compounds respectively adjacent to ancient woodland areas as identified by the Forestry Commission. The ES should consider the potential impacts and disturbance within the buffer zone of the ancient woodland, and consider appropriate mitigation). Site investigations should be carried out to determine whether they are present within the study area of the Proposed Development and if so, impacts to ancient and veteran trees and ancient woodland should be assessed where significant effects are likely to occur and mitigation measures proposed where necessary.</p>

ID	Ref	Other points	Inspectorate's comments
4.3.7	7.3.2	Updated CIEEM Guidance (2019)	The assessment of ecological effects in the ES should be undertaken in accordance with the new, updated CIEEM Ecological Impact Assessment Guidelines published in September 2019.
4.3.8	7.3.15, 7.3.29, 7.3.43	Priority Habitats	The definitions of notable and species and habitats should be refined in the ES and include 'priority' species and habitats in line with the NERC Act 2006. Additionally, any mitigation and monitoring measures

ID	Ref	Other points	Inspectorate's comments
			considered should account for the identified priority habitats and species where appropriate.
4.3.9	7.3.26, 7.3.29 and 7.3.30	Zone of Influence and Study Areas	The Scoping Report doesn't explain in detail how the Proposed Development's Zone of Influence (ZoI) has been determined and how it relates to the study areas applied in the ecological assessments (2km for protected species, 500m up and downstream for aquatic fauna). Potential impacts to the Thames Basin Heaths SPA have also apparently been omitted. The Applicant should ensure that any assessments in the ES relate to the extent of the ZoI and ensure that all potential impacts with a likely significant effect on sensitive receptors is assessed.
4.3.10	7.3.28	Significant increases in traffic flows and subsequent impacts outside the scoping boundary	The Scoping Report proposes that anticipated change in traffic flows on routes serving the site, will be an indicator of impacts for the purposes of the assessment. Ecologically designated sites within 200m of these routes will be included within the study area. In the ES assessment, this should also include habitats and protected species.
4.3.11	Paragraph 7.3.30	Survey area for mobile species	The ES should explain which species are regarded as being 'mobile' for the purposes of the assessment. Surveys are proposed for bats, aquatic mammals and potentially fish but surveys for other relevant mobile species should be undertaken, particularly in relation to birds located within the Proposed Development's ZOI.
4.3.12	7.3.42 to 7.3.45	Proposed Mitigation	The Scoping Report provides sparse detail on the mitigation proposed and uses vague wording such as 'may' meaning it remains unclear what mitigation is proposed where. The ES should clearly present the mitigation required to address significant effects and ensure this is secured appropriately e.g. as part of a landscaping and ecological management plan to be secured by requirements in the DCO. Draft or finalised management plans should be provided with the ES.

ID	Ref	Other points	Inspectorate's comments
4.3.13	7.3.42 to 7.3.45	Mitigation and enhancement – bird collision risk	Impacts resulting from implementation of proposed mitigation should be assessed where significant effects may occur. This is particularly relevant to proposed bird mitigation measures and the potential for collision risk. The Applicant should make effort to ensure that mitigation areas do not result in increased hazards to air traffic.
4.3.14	7.3.45 and 7.3.22	Impacts from nitrogen deposition	Monitoring of the effects of nitrogen deposition should be included in the proposed/ongoing surveys to inform the assessment of likely significant effects and any subsequent remedial measures for the ES, particularly for receptors sensitive to such changes including (but not limited to) Ashdown Forest SAC and SPA, Mole Gap and Reigate escarpment SAC, botanical receptors and areas of ancient woodland/notable trees.

4.4 Geology and Ground Conditions

(Scoping Report section 7.4)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.4.1	Table 7.4.2 and 7.4.26 to 7.4.28	Effects on soils	<p>The Scoping Report omits potential impacts in terms of loss, destruction and excavation/storage of soils during construction of the Proposed Development.</p> <p>The ES should include an assessment of such impacts where significant effects are likely to occur.</p>
4.4.2	Table 7.4.2	Effects from the removal of any potential contaminants from the site	<p>The ES should include an assessment of the likely significant effects on nearby sensitive receptors including the public from the removal of any potential contaminants from the site, and quantification of the potential volumes involved (making worst case assumptions where required).</p> <p>This should also be framed in the context of the potential location and capacity of waste disposal infrastructure to handle such wastes, and cross reference will need to be made to relevant assumptions in relation to traffic generation and any consequential effects</p>

4.5 Water Environment

(Scoping Report section 7.5)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.5.1	Table 7.5.2 and 7.5.31	Impacts to Baldhorns Brook, Ifield Brook and Stanford Brook and Mole	The Scoping Report proposes to scope out the Baldhorns Brook, Ifield Brook and Stanford Brook and Mole (Hersham to River Thames confluence at East Molesey) due to their distance and location upstream from the Proposed Development. However, this is not based on a reference to the Proposed Development's ZoI nor is there evidence of agreement with relevant consultation bodies. The ES should assess impacts to these receptors where significant effects are likely to occur.
4.5.2	Table 7.5.6	Impacts due to increased flows on watercourses from impermeable areas	The ES should include an assessment of the potential impacts from increased flows on watercourses due to an increase in hardstanding/impermeable areas. There are also water quality effects from potential increases in pollutant runoff and sedimentation loads, particularly during operation due to an increase in aircraft and ground vehicles. Appropriate cross reference to impacts on other aspects (such as ecology) should be made.

ID	Ref	Other points	Inspectorate's comments
4.5.3	7.5.16 to 7.5.18 and 7.5.26	Quantifying baselines	The Scoping Report does not quantify the inputs and outputs of the balancing ponds located within the Scoping Boundary and it is repeatedly stated that Pond D receives the bulk of contaminated and clean water from runway runoff. The ES should quantify the baseline of such inputs/outputs in order to account for any changes and subsequent impacts and effects.

ID	Ref	Other points	Inspectorate's comments
4.5.4	Section 7.5	Cross reference	The water assessment has potential to inform other assessments such as Ecology and geology and ground conditions; where this is applicable, any assessments should be cross referenced in the ES (section 7.15 of the Scoping Report is noted in this regard).
4.5.5	7.5.52 to 7.5.54 and 7.5.82	Mitigation	The Scoping Report indicates the extent to which the Code of Construction Practice will be relevant to the assessment. The ES should include sufficient detail regarding mitigation measures during construction and operation and explain how this will be secured.
4.5.6	7.5.86	Wastewater capacity	<p>The Scoping Report is somewhat contradictory in terms of wastewater capacity stating in paragraph 7.5.46 that there is indicated stress on some systems and in paragraph 7.5.14 that sewer flood risk is considered likely to be low.</p> <p>The ES should assess impacts to the existing drainage regime and its associated infrastructure the Applicant should undertake consultation with relevant consultation bodies regarding the capacity of wastewater treatment infrastructure.</p>
4.5.7	Table 7.5.6	Management of pluvial and fluvial flows	The ES must describe how pluvial and fluvial flows will be managed during the construction phase and assess any significant effects associated with impacts from the Proposed Development. Any mitigation measures relied upon to reduce/avoid significant effects must be described and appropriately secured (eg through the CoCP or other measures).
4.5.8	7.5.87	Cumulative impacts on water supplies	The Proposed Development is located in an area of existing high-water stress and has the potential to increase such stress. Mitigation beyond what is proposed in the Scoping Report should be considered, specifically, to reduce consumption and to increase water recycling.

ID	Ref	Other points	Inspectorate's comments
4.5.9	7.5.52 to 7.5.54	Flood Risk Assessment	The assessment of flood risk in the ES should take into account the potential impacts of climate change using the latest UK Climate Projections (UKCP) available at the time of preparation (including new local (2.2km) climate projections). The Inspectorate is aware that updates to the UKCP18 climate change projection data are being released on an ad-hoc basis.
4.5.10	Section 7.5	Water Cycle Study	The assessment in the ES should, as appropriate, have regard to information being prepared by, Crawley Borough Council, Reigate and Banstead Borough Council and Mid Sussex District Council for their water cycle study.
4.5.11	7.5.81	Water Framework Directive (WFD) Assessment consultation	The Scoping Report determines that in producing a Flood Risk Assessment, the EA and LLFA and other relevant stakeholders will be consulted on, however, this is not specified for the WFD. The Applicant is advised to review the Inspectorate's Advice Note eighteen when determining the scope and methodology of the WFD assessment.

4.6 Traffic and Transport

(Scoping Report section 7.6)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.6.1	7.6.49, 7.6.68	Traffic effects on users of public rights of way, air quality and noise.	<p>The Inspectorate notes that assessment of effects on users of public rights of way will be provided within the Land Use and Recreation chapter ES, and that air quality and noise effects of traffic will be considered separately in the ES. Paragraphs 7.6.24 and 7.6.27 refer to "walking and cycling" as part of the baseline conditions and proposed scope of the assessment, and 7.6.64 to maintenance and improvement of cycling and walking facilities being an <i>"important part of the airport surface access strategy"</i>.</p> <p>The Inspectorate agrees that these matters need not be duplicated within the scope of the Traffic and Transport chapter, but requests that appropriate cross references are made between the relevant aspect chapters in the ES to improve understanding of the interrelated effects.</p>

ID	Ref	Other points	Inspectorate's comments
4.6.2	7.6.2-3, 7.6.51	Significance of effect	<p>The Scoping Report explains that the assessment will follow the (generic) approach set with regard to identification of receptor sensitivity, impact magnitude and significance of effects, reference is also made to guidance within DMRB and IEMA guidance. For the avoidance of doubt, the ES should explain the specific criteria used in the assessment and every effort should be made to agree such criteria with relevant statutory consultees and other relevant stakeholders.</p>

ID	Ref	Other points	Inspectorate's comments
4.6.3	7.6.5 , 7.6.28	Data currency	<p>The Scoping Report refers to 2016 traffic counts and employee surveys as well as other data previously used to inform the Airports Commission process.</p> <p>However, the Scoping Report also refers to further additional data to be collated at paragraph 7.6.28, to supplement existing data. The ES should clearly present the periods over which data has been collected and where previous sources are being relied upon, justification should be provided to demonstrate the suitability of such data.</p>
4.6.4	7.7.6	Existing Baseline Conditions - Rail and Public Transport	<p>The Applicant aims to increase public transport mode share for passengers from 44% to 48% by 2022. Any such assumptions which influence the definition of future baseline conditions (passenger and employee modal shares) should be clearly presented in the ES and be subject to sensitivity testing where applicable such that consideration is given to different mode share scenarios in assessing a worst case scenario (eg the continuation of current staff travel pattern and modal shares). In this regard, the Inspectorate notes that the Proposed Development would result in 3,000 on-airport jobs more indirect employment. This also ties in to the comments in 4.6.6 below in respect of the Airport Surface Access Strategy (ASAS).</p> <p>The Scoping Report makes no reference to the provision of travel plans associated with the Proposed Development (for example in relation to staff travel). The ES should explain the need for / absence of such plans in delivering mitigation measures in order to achieve the predicted and assessed modal shares.</p>
4.6.5	7.6.12	Baseline rail services	<p>Paragraph 7.6.12 explains that improvements to train capacity provides "sufficient overall capacity for Gatwick to continue to grow its rail mode share over the next decade". The anticipated delivery timescale for the Proposed Development extends beyond this period (ie to 2038). The ES should assess the impacts to the rail network</p>

ID	Ref	Other points	Inspectorate's comments
			<p>taking into account the anticipated capacity and projected growth from increased passenger and employee movements (as well as non-airport user increases as a result of the Proposed Development). Cumulative impacts with planned and necessary developments to achieve this anticipated growth should also be assessed in demonstrating the validity of capacity assumptions set out in the ES.</p>
4.6.6	7.6.26, 7.6.61	Transport Assessment (TA)	<p>The traffic and transport chapter will be supported by a TA. The Applicant should ensure that the relationship between the TA and the scope of the traffic and transport assessment is fully explained and justified within the ES. The Applicant should make effort to agree the scope of the assessment with the relevant consultation bodies.</p> <p>Reference is also made to the TA including an ASAS, which will set targets for the mode share of passengers and staff by sustainable modes and the packages of measures required to deliver this. The ES should explain how any such measures will be secured. The ES should explain how the ASAS relates to the assessment of likely significant effects and what reliance is placed on it in this regard. If information contained in the ASAS is necessary to support understanding of the likely significant effects, it should be included in the ES.</p>
4.6.7	7.6.40, Diagram 7.6.1	Study areas and traffic model architecture	<p>Diagram 7.6.1 splits airport-related highway demand into passenger and employee trips, but does not set out how trips by airport supplier goods delivery trips and visitors to the airport (people using the airport hotels without being air passengers or visitors to on-airport businesses) will be accounted for in the modelling. The ES and TA should clearly present how such trips have been quantified and assessed as part of the wider traffic modelling.</p>
4.6.8	7.6.40, 7.6.61-63	Stakeholder engagement	<p>It is clear that significant engagement is planned and ongoing with the relevant consultation bodies (particularly as part of the surface access topic working group).</p>

ID	Ref	Other points	Inspectorate's comments
	(and 2.3.6-2.3.15)		Agreements reached with consultation bodies on the Applicant's methodological approach to the assessment (as part of the topic working group) should be documented in the ES where relevant, for example in recording agreement of strategic and local highway network detailed modelling areas.
4.6.9	7.6.50-60	Approach to Assessment of Effects	<p>The assessment should demonstrate how the worst-case construction and operational assessment scenarios and assumptions are considered with regard to trip generation and modal splits.</p> <p>The assessment years should be consistent between the traffic and transport, air quality and noise assessments where relevant and effort should be made to be agree the approach with the relevant consultation bodies.</p> <p>The construction and operational assessment should clearly set out how impacts associated with closures or delays on the M23, M25 or the A217 have been considered. In particular, the potential for increased traffic on the villages of Hookwood and Charlwood should be specifically considered given anticipated duration of the proposed construction works to the north and south terminal junctions and the impacts on these villages in the event of a closure(s) during operation.</p>
4.6.10	7.6.50	Operational effects	Assumptions around the increased movements of freight "to and from the airport by rail, public transport, road, cycling and walking" during operation should be explained and ideally quantified. A worst case assessment should be adopted to account for uncertainty in the assumptions and particularly in respect of movements by road and rail over baseline and future baseline conditions.
4.6.11	7.6.63	Approach to Mitigation and Monitoring	The Inspectorate is unclear what is meant by the creation of an "integrated travel application for passengers and staff...facilitating

ID	Ref	Other points	Inspectorate's comments
			<p>Mobility-as-a-Service". This will need to be further explained as part of the ES, including how any such measures would be secured.</p>
4.6.12	7.6.63	Operational mitigation and monitoring	<p>The ES should explain the relevant provisions for the Applicant to monitor surface access impacts "as required by Highways England, Network Rail and the Department for Transport to demonstrate the successful mitigation of the effects of the Project". No further information is provided as to the metrics of such monitoring, how "success" will be determined and what remedial actions (if any) could be involved (eg physical, operational or behavioural). The ES should describe these matters where relevant.</p>
4.6.13	7.6.65	Mitigation during construction	<p>The Scoping Report proposes that a Construction Traffic Management Strategy (CTMS), will be implemented to deliver mitigation measures to "ensure the transport of construction materials and waste is managed as sustainably as possible", eg through use of rail facilities close to the airport as "appropriate and feasible". Any assumptions made in this regard should be set out in the ES, which should reflect a worst case scenario in the absence of such commitments being guaranteed.</p> <p>In particular, the description of the Proposed Development in the ES should explain the extent to which existing infrastructure would allow for such deliveries by rail.</p>
4.6.14	7.6.65	Construction effects	<p>Paragraphs 5.3.14 to 5.3.16 of the Scoping Report explains that there is some uncertainty around the need for and location of a Construction Logistics Consolidation Centre. Where such a facility is required, volumes of trips between this compound and main construction locations should be presented. Where uncertainty exists a worst case should be assumed with respect to additional traffic generation on the local and strategic highway networks. The</p>

ID	Ref	Other points	Inspectorate's comments
			Applicant should have regard to Transport for London's GAL Construction and Logistics Plan (CLP) guidance in this respect.

4.7 Air Quality

(Scoping Report section 7.7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.7.1	7.7.40	Consideration of pollutants listed in the Air Quality Standards Regulations 2010 (other than NO _x , NO ₂ , PM ₁₀ and PM _{2.5}) ⁷	<p>On the basis of the Defra TG16 guidance notes (the only relevant pollutants for road traffic and airports are NO₂ and particulate matter) and the local authority review and assessments (other regulated pollutants are very unlikely to be significant and are not identified as being likely to exceed their respective air quality standards), the Applicant seeks to scope all other pollutant species listed in the Air Quality Standards Regulations 2010 out of the assessment.</p> <p>Paragraph 7.7.28 of the Scoping Report also refers to "<i>Other airport sources, such as energy and heating plant</i>" as being relevant to the assessment.</p> <p>On the basis of the uncertainty regarding the specification of any energy and heating plant and aircraft auxiliary power units (APUs), and the fact that SO₂ is considered as a "relevant combustion product" for aviation projects by the CAA, the Inspectorate considers that assessment of these pollutants cannot be scoped out at present.</p> <p>The Applicant should demonstrate that it is unlikely to give rise to significant air quality effects from these pollutants through the provision of a detailed screening assessment where relevant (particularly in respect of SO₂).</p>

⁷ In addition to NO_x, NO₂ and particulate matter, The Air Quality Standards Regulations 2010 defines 'pollutants' as: sulphur dioxide, lead, benzene, carbon monoxide, arsenic, cadmium, mercury, nickel, benzo(a)pyrene or other polycyclic aromatic hydrocarbons and ozone. The Inspectorate therefore considers that it is all of these pollutants that the Applicant is seeking to scope out of the assessment.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			<p>The ES should include an assessment of the impacts associated with activities involving other pollutants, where they are likely to give rise to significant effects.</p>
4.7.2	7.7.41	<p>Assessment of odorous materials during the construction phase</p>	<p>Paragraphs 7.4.17 and 7.4.18 in relation to geology and ground conditions explain that a desk based Phase 1 Preliminary Risk Assessment will be undertaken to include an assessment of potential sources of contamination at the site (from historical and current land uses) both on site and in the surrounding area, and that this will be used to determine the requirement for any additional intrusive investigation at the site.</p> <p>At present there remains a degree of uncertainty regarding the potential for odorous contaminated material to be disturbed by the Proposed Development. Accordingly the Inspectorate is not in a position to agree to scope these matters from the assessment. The ES should (with reference to the phase 1 ground investigation studies) assess impacts from odorous material during construction where significant effects are likely to occur.</p> <p>The assessment of odorous materials should cross refer to other relevant aspects and matters in the ES to ensure that a robust assessment has been undertaken.</p>
4.7.3	7.7.42	<p>Jettisoning of fuel</p>	<p>The Inspectorate agrees that the jettisoning of fuel from aircraft can be scoped out of the air quality assessment on the basis that:</p> <ul style="list-style-type: none"> • It is an infrequent occurrence, only used in emergency situations; and • If required, it would be at a high altitude (to vaporise the fuel and facilitate dispersion).

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			<p>The Inspectorate agrees that there is no potential for significant air quality effects from this activity. The Inspectorate also assumes that operational safety procedures are in place for such situations in connection with the existing operations at Gatwick.</p>

ID	Ref	Other points	Inspectorate's comments
4.7.4	7.7.2, 7.7.25-27 and 7.7.39	Construction dust	<p>The Scoping Report refers to the IAQM guidance 'Assessment of dust from demolition and construction', and states that monitoring during construction will be included as part of the CoCP (if required).</p> <p>The need for monitoring during construction should be considered in accordance with the IAQM 'Air Quality Monitoring in the Vicinity of Demolition and Construction Sites'.</p> <p>In particular, the CoCP described at paragraphs 5.3.9 – 5.3.11 should be clear as to how the need for monitoring has been determined, how the construction air quality assessment relies on delivery of such monitoring.</p> <p>Specific consideration of construction dust effects to the adjacent Riverside Garden Park will also need to be presented as part of the assessment (having regard to its proximity to the proposed North and South terminal junction works).</p>
4.7.5	7.7.3, 7.7.13, 7.7.22-23 and Table 7.7.3	Air Quality Standards and effects proposed to be Assessed	<p>The Applicant acknowledges that SO₂ may contribute to acid and nutrient nitrogen deposition at natural ecosystems, but Table 7.7.3 only refers to "<i>harm to ecological receptors due to increased NO_x concentrations and nitrogen deposition</i>".</p> <p>The Inspectorate considers that the assessment of air quality impacts on ecological receptors should be extended to consider SO₂.</p>

ID	Ref	Other points	Inspectorate's comments
			(See also item 4.7.1 above)
4.7.6	7.7.9	AQMA's	<p>Air Quality Management Areas (AQMA's) are presented in the Scoping Report with reference to the existing baseline conditions, but they are not specifically referenced further in terms of the proposed scope of the assessment.</p> <p>The Applicant sets out that the assessment of air quality effects will be informed by relevant transport modelling and this should be used to define an appropriate study area for the assessment of effects. Any impacts to AQMA's identified within the transport models should be assessed. For example, the A23 Hooley AQMA may experience impacts given that a large proportion of the airport's passenger traffic comes from London and is likely to access the airport via the A23/ M23 alongside relevant AQMA's on the M25. The impacts on the Hazelwick Roundabout AQMA should also be specifically considered during construction and operation given the works associated with the North and South terminal junctions and the increased airport passenger and employee trip generation that is likely to affect this AQMA in particular.</p>
4.7.7	7.7.15-16	Proposed Scope of baseline studies	<p>The Inspectorate notes that there are five continuous monitoring sites within 1 km of Gatwick Airport and a "wide network of diffusion tubes" from which to consider baseline data.</p> <p>The Scoping Report explains that an air quality diffusion tube survey along the A23 Brighton Road and in the vicinity of the Hazelwick roundabout is ongoing. There are no other references to the need for additional project-specific monitoring to inform the determination of baseline conditions.</p> <p>The ES should clearly set out all studies and surveys undertaken to inform the final baseline information, including the timing of any site visits and how/if professional judgement has been applied. The</p>

ID	Ref	Other points	Inspectorate's comments
			Applicant should make effort to agree its approach with the relevant consultation bodies.
4.7.8	7.7.17	Future baseline conditions	The ES should clearly set out assumptions made around predictions of future background pollutant concentrations, including details as to how the predicted growth of passenger throughput in the absence of the Proposed Development ("scenario 1" as presented in Chapter 3 of the Scoping Report) influences the future baseline.
4.7.9	7.2.21	Study area for operational effects	<p>The Applicant proposes to predict pollutant concentrations across a gridded area "<i>likely to be 11 km by 10 km centred on the airport</i>", (subject to amendment if required to ensure all significant effects are captured), and including discrete sensitive human and ecological receptors which may be beyond the contour grid area.</p> <p>This process should be clearly set out in the ES, including reasons why discrete receptors outside of any defined contour grid area need not warrant an extension to that grid area.</p> <p>The ES should have regard to the Air Navigation Guidance 2017 with respect to the parameters for assessment of aviation emissions on local air quality.</p> <p>The Inspectorate agrees that the study area is not appropriately defined by an 'arbitrary limit' and instead should be defined by the area over which significant air quality effects could arise.</p>
4.7.10	7.7.18-21	ADMS Roads and ADMS Airports	The ES should explain how modelled outputs across gridded areas (or at modelled receptors) will be considered together such that combined concentrations associated with road traffic and aircraft emissions can be predicted (where applicable).
4.7.11	7.7.22	Ultrafine Particles	In undertaking an assessment of PM ₁₀ and PM _{2.5} , the Applicant should be aware of the recommendations of the Government's air quality

ID	Ref	Other points	Inspectorate's comments
			expert group publication 'Ultrafine Particles (UFP) in the UK' report, and the Government's draft aviation 2050 strategy around UFP and take into account emerging policy and legislative change in this regard.
4.7.12	7.7.23	Sensitive receptors	The sensitive receptors in the ES should include airport passengers, users of associated facilities (eg hotels and offices) and employees where relevant.
4.7.13	7.7.29 – 7.7.32	Aircraft engine emissions and assessment scenarios	<p>As part of the detailed emissions inventory, the ES should present the anticipated level of aircraft emissions having regard to air traffic projections at each of the assessment scenario intervals. Any assumptions made in respect to fleet composition, engine standards, and growth rates (or ranges) should be explained and justified.</p> <p>The Applicant explains that the modelling "<i>can allow for variations of each of the emission sources with time</i>", and the ES should explain how these variations could affect the assessment of significant effects though sensitivity analysis or otherwise. These assumptions should also be framed in the context of the "key parameters" as set out in table 5.4.1 (in particular around additional passenger air transport movements).</p>
4.7.14	7.7.38	Operational odour effects	The potential need for, specification and location of water treatment works is not yet defined (as set out in paragraphs 5.2.58 – 5.2.60). The air quality assessment should address the potential impacts of any proposed treatment works on nearby sensitive receptors in accordance with the IAQM odour guidance, and consider the need for mitigation measures where appropriate. In accordance with that guidance, the ES should set out how a multi-tool approach has been applied to determine the need for impact screening, sampling and dispersion modelling in order to assess effects at relevant sensitive receptors.

ID	Ref	Other points	Inspectorate's comments
4.7.15	7.7.39	Mitigation	<p>The ES should clearly set out the criteria against which the need for operational mitigation measures will be determined, and the suite of measures that have been considered. In doing so, the Applicant should demonstrate regard given to the Sussex Air Partnership's <i>Air Quality and Emissions Mitigation Guidance for Sussex</i> (2019) in assessing air quality impacts and deriving necessary mitigation measures as well as the Defra '<i>Air quality damage cost guidance</i>'.</p>

4.8 Noise and Vibration

(Scoping Report section 7.8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.8.1	7.8.56	Consideration of "quiet areas"	<p>The Scoping Report attests that the "<i>study area for noise and vibration effects...cannot be determined until noise levels resulting from the Project have been modelled</i>". Therefore the Inspectorate cannot agree that impacts to 'Quiet Areas' (as designated within Local Plans or Neighbourhood Development Plans or areas identified as Quiet Areas through the Environmental Noise (England) Regulations 2006)) can be scoped out of the ES.</p> <p>The assessment should assess impacts on these areas, where significant effects are likely to occur.</p>
4.8.2	7.8.57	Consideration of aircraft auxiliary power units (APUs)	<p>The Applicant seeks to scope out consideration of APUs on the basis that previous ground noise studies and operational reports demonstrate that the need for APUs is rare (as ground power is generally available) and that the sound power of a taxiing jet aircraft exceeds that of an APU such that increases to the overall sound power (when APU noise is combined) are 'inconsequential'.</p> <p>The Inspectorate does not consider that the Applicant has provided sufficient information to justify scoping this matter out. The ES should assess impacts associated with noise from APUs where significant effects are likely to occur.</p>
4.8.3	7.8.58	Vibration associated with construction works and operation of the Proposed Development within the airport.	<p>Construction and operational vibration within the airport are sought to be scoped out on the basis that such these activities will be sufficiently distant from noise sensitive receptors such that significant vibration effects are unlikely.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			<p>The Scoping Report contains limited information with regards to potential sources of construction or operational vibration and the Inspectorate is therefore unable to scope this matter out. The ES should include an assessment of operational vibration, where likely significant effects could occur.</p>
4.8.4	7.8.59	Vibration from operational road traffic	<p>The Scoping Report provides very little information on the type and nature of road traffic and the junction designs necessary to support the statement that "<i>vibration from operational road traffic...is expected to be below the scoping thresholds</i>". Accordingly the Inspectorate does not agree to scope this matter out.</p> <p>The Inspectorate considers that an assessment of vibration effects arising from construction vehicles on the existing road network should be provided as part of the ES, in line with the methodological approach established in the Design Manual for Roads and Bridges (DMRB).</p> <p>It is unclear whether the Applicant also proposes to scope out vibration from construction traffic, but for the avoidance of doubt, the Inspectorate's comments above apply equally in the context of construction traffic (noting the additional relevance of BS:5228 'Code of practice for noise and vibration control on construction and open sites' in this regard).</p>

ID	Ref	Other points	Inspectorate's comments
4.8.5	7.8.1, 7.8.37 – 7.8.41	Air noise and Ground noise	<p>The assessment should provide a clear description to distinguish between where "air noise" and "ground noise" begin and end. The description should have regards to the activities such as landing and taxiing planes. For example, once a plane lands and is off the runway,</p>

ID	Ref	Other points	Inspectorate's comments
			<p>at what point does it become part of the "ground noise". Particular consideration will also need to be given to the provisions of the 'end-around' taxiways and new holding spurs in this regard as they bring taxiing aircraft closer to existing sensitive receptors.</p> <p>The ground noise assessment should also be clear as to how other 'key components' of the project have been factored in (including substations, heating plant, engine testing and the north and south terminal extensions) in terms of any additional contributions over aircraft ground noise at sensitive receptors.</p>
4.8.6	7.8.6 – 7.8.7	Airspace change and baseline and future baseline usage of the Northern runway	<p>The Applicant explains that the project does require the routings of aircraft "close to the airport" to be changed, which would appear to contradict the later assertion that "any noise impacts of the Project will be the result of increases in noise due to the increased number of flights on the northern runway, rather than new noise impacts over areas previously unaffected".</p> <p>The ES should assess the likely significant effects associated with these changes and assess effects on additional affected noise receptors.</p> <p>The ES should also assess the extent to which the Proposed Development would result in an increased capacity on the main runway (potentially) allowing for additional movements by larger, noisier aircraft which could generate further increases in noise on the main runway compared to current operation.</p> <p>The baseline and future baseline assumptions in terms of usage of the northern runway should also be clearly set out so as to understand the number of additional movements being modelled in predicting significance of effect.</p>

ID	Ref	Other points	Inspectorate's comments
4.8.7	7.8.6 – 7.8.7	Airspace change process	<p>The Scoping Report states that the EIA will be undertaken based on existing flight path data, and that the CAP1616 guidance on noise assessment processes and metrics will be taken into account as part of the assessment in the ES.</p> <p>The Airports NPS states that the assessment of aircraft noise should be undertaken in accordance with the developing indicative airspace design, which may involve the use of appropriate design parameters and scenarios based on indicative flight paths.</p> <p>The ES should ensure that it presents an assessment of the realistic worse-case scenarios for the Proposed Development, including consideration of any airspace change implications for the noise assessment and the introduction of performance-based navigation.</p> <p>The assumed Air Traffic Movements (ATM) should be clearly stated for all assessment scenarios. Furthermore, a WebTAG analysis to value and compare the noise impact of these options should be provided consistent with the requirements of the Air Navigation Guidance 2017 (as cited by the Applicant at 7.14.7 of the Scoping Report).</p> <p>When considering the introduction of quieter aircraft each year against growth in ATMs, the ES should clearly identify the worst case scenarios in terms of noise effects (against CAA's latest estimates as set out at paragraph 7.8.30 of the Scoping Report).</p>
4.8.8	7.8.9 – 7.8.10	Baseline data	<p>The Applicant explains that the baseline for the air noise assessment will be the 2018 summer season. There is also reference to 15 Gatwick Airport Noise and Track Keeping (NTK) sites being "<i>live with others at various stages of planning and installation</i>". Reference is then made to additional baseline noise level measurements were conducted in August 2016 at locations shown in Figure 7.8.1).</p>

ID	Ref	Other points	Inspectorate's comments
			<p>The ES should clearly describe how the monitoring locations have been selected and the extent to which they are agreed with the relevant consultation bodies.</p> <p>The methodology used for the baseline noise surveys should be described in the ES and/or accompanying technical appendices.</p> <p>The Inspectorate recognises the importance of establishing an accurate and current baseline in order to determine the need for noise mitigation measures. The ES should demonstrate regard to the Airports NPS in this respect.</p>
4.8.9	7.8.24 and 7.8.28	Study area and AONBs	<p>The Inspectorate notes the study area for the aircraft noise assessment is yet to be defined. The Inspectorate considers that the study area should include receptors beneath flight paths within the High Weald AONB, Surrey Hills AONB, Kent Downs AONB and South Downs National Park, including the potential for cumulative noise impacts with other development (including airports). This should also extend to the consideration of noise effects at heritage sites and historic parks and gardens that may be subject to adverse noise effects.</p> <p>Paragraphs 7.2.9 and 7.8.28 explain that the Applicant intends to consider such matters as part of the LVIA chapter, but the noise chapter should assess the potential for interrelated effects in this regard.</p>
4.8.10	7.8.24 (and 7.15)	Study area	<p>The definition of the study area for the noise assessment should also assess noise effects of the Proposed Development on future residential amenity of existing allocations under the relevant local plan proposals where significant effects are likely to occur (with reference to the study area as informed by the noise modelling results).</p>

ID	Ref	Other points	Inspectorate's comments
4.8.11	7.8.25-28	Effects Proposed to be Assessed (Sensitive noise receptors)	There is no reference to any consideration of noise sensitive ecological receptors in addition to human receptors. The ES should clearly identify the sensitive receptors considered in the impact assessment and include cross-referencing between aspect chapters, as appropriate.
4.8.12	7.8.29	Assessment years	Reference is made to the assessment years of 2026, 2029 and 2038. The ES should explain and assess the "maximum effect" in terms of noise generation which may not coincide precisely with the assessment years presented in the Scoping Report.
4.8.13	7.8.31-36	Approach to the assessment of effects	<p>The terms NOEL, LOAEL, and SOAEL are defined in the glossary in section 12 of the Scoping Report, and considered further as part of Scoping Report Appendix 7.8.1 (Aircraft Noise Policy Summary).</p> <p>NOEL, LOAEL and SOAEL are not defined in the main body of the Scoping Report in terms of the approach to the assessment, and no definition is provided anywhere in the Scoping Report for an Unacceptable Adverse Effect Level (UEAL). The ES should use and define these for the purposes of the assessment in line with the requirements of the NPSE.</p> <p>The Applicant has acknowledged the World Health Organisation (Environmental Noise Guidelines for the European Region (2018)) at paragraph 7.8.2 of the Scoping Report. The Inspectorate notes that this publication recommends adverse effects from aircraft noise can begin at lower levels than the corresponding figures in The Environmental Noise (England) Regulations 2006.</p> <p>The Applicant should specifically address how this and other relevant guidance has been factored in to the defined NOEL, LOAEL, SOEAL and UEALS.</p>

ID	Ref	Other points	Inspectorate's comments
4.8.14	7.8.31-36	Approach to the assessment of effects – aborted landings.	The ES should factor in relevant assumptions in relation to aborted landings based on actual statistics held by the Applicant. The Inspectorate considers that where the number of arrivals increase then the number of aborted landings will increase proportionally which could cause a higher than normal level of effect on noise sensitive receptors due to the low altitude and displaced location of the aircraft.
4.8.15	7.8.31-36	Approach to the assessment of effects	<p>The Inspectorate understands that future growth on a single runway operation will be achieved by 'peak spreading' as set out in section 4.5 of the Scoping Report and that this is also the case for the dual-runway operation (off peak periods are expected to experience a greater increase in ATMs than peak periods (paragraph 4.5.1, and as shown on diagram 4.5.1 of the Scoping Report). As such, although the summer months may still represent peak activity, the magnitude of change as a result of the Proposed Development is greater outside of these peak periods. Therefore, the ES should clearly set out how the use of the 'summer contours' accounts for the full impact of 'peak spreading'.</p> <p>The assessment should also include L_{den} and L_{night} contours (in line with the Air Navigation Guidance 2017, CAP1616, and the Airports Commission noise 'scorecard') that are based on flights year round (therefore also accounting for flights outside the busy summer period).</p>
4.8.16	7.8.31-44	Approach to the assessment of effects - Construction noise	<p>Paragraphs 7.8.31-44 do not specifically outline the approach in relation to construction noise, other than a brief statement in paragraph 7.8.44 that effects of construction noise will be predicted and assessed using BS 5228.</p> <p>Assumptions around noise generating construction activities and plant should be clearly presented in the ES to support understanding of the</p>

ID	Ref	Other points	Inspectorate's comments
			<p>modelled assessment years and scenarios. The construction noise assessment should include criteria for the assessment of noise effects during weekends and night time hours where such works are proposed or not otherwise restricted. In particular paragraph 5.3.18 of the Scoping Report explains that much of the construction work will take place overnight to reduce impact on the operation of the airport, and access roads. The outline CoCP should detail specific mitigation measures to address effects from such works where significant effects are likely.</p> <p>Impacts associated with the potential increased use of Crawley Goods Yard during the construction phase should be addressed as part of the assessment as such activities may also occur overnight.</p>
4.8.17	7.8.37-41	Ground Noise	<p>The ES should assess on-site noise emissions from fixed plant relating to the Proposed Development where likely significant effects could occur. Static sources should be assessed using BS4142: 2014 Methods for rating and assessing industrial and commercial sound.</p> <p>The ES should also include an assessment of groundborne noise from increased rail movements associated with the Proposed Development and any other relevant sources.</p>
4.8.18	7.8.44	Construction and construction traffic noise	<p>The peak period of construction traffic flows used to inform the assessment should be explained with reference to the schedule of construction activity. Given the spatial extent of the works, the assessment should also consider whether peak periods of activity may vary by receptor or groups of receptors.</p> <p>Table 5.4.1 of the Scoping Report explains that the construction of the Proposed Development is due to commence in 2022 with completion of the work between 2028-2034, thereby a construction phase of up to 12 years. The approach to the assessment of</p>

ID	Ref	Other points	Inspectorate's comments
			<p>construction traffic should therefore ensure that it is suitably representative of such a duration.</p> <p>Paragraph 7.8.44 also states that "<i>the assessment of construction traffic noise will be based on a period of peak traffic flow</i>" whereas paragraphs 5.3.17 – 5.3.18 imply that the construction will be scheduled at night to minimise disruption (ie outside of peak traffic flows). The ES should define the worst case scenario in this respect or present both peak construction activity and peak traffic flow scenarios as part of the assessment of effects.</p>
4.8.19	7.8.51	Mitigation measures	<p>The ES should explain how the Proposed Development interacts with the existing Noise Insulation Scheme prepared in accordance with the Noise Action Plan 2019-2024. If the assessment establishes that the action plan needs to be "<i>enhanced as part of a package of noise mitigation measures</i>" in order to mitigate adverse effects of the Proposed Development then the ES should explain how this will be achieved.</p> <p>The full package of potential mitigation measures will need to be presented as part of the ES and options explained in terms of a mitigation hierarchy as the Inspectorate considers noise insulation to be a 'last resort'.</p> <p>Where noise insulation is proposed, the ES should describe what forms of ventilation are proposed eg acoustic louvres and / or mechanical ventilation.</p> <p>The Inspectorate notes that there is no reference to a defined 'noise envelope' as referred to in paragraph 5.60 of the Airports NPS, and the Applicant should make efforts to agree the need for such provisions with relevant consultation bodies as a mechanism to manage noise effects.</p>

4.9 Climate Change and Carbon

(Scoping Report section 7.9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.9.1	7.9.86	Climate change resilience – sea level rise	The Inspectorate agrees that the vulnerability of the Proposed Development to sea level rise can be scoped out of the assessment on the basis that the application site is not at risk of coastal flooding resulting from climate change.
4.9.2	Table 7.9.5 and 7.9.87-7.9.89	GHG – Inward and outward flights	The Applicant's Scoping Report includes details of the GHG emissions sources it proposes to include or exclude from the assessment. The Scoping Report refers to the consistency with the United Nations Framework Convention on Climate Change approach to allocate aviation emissions to the country of departure. The Inspectorate recommends that the ES assesses the impact on arriving flights to the extent that the new airspace design affects the arriving traffic consistent with the CAP1616a requirements.
4.9.3	7.9.67	Cumulative assessment of GHG	The Scoping Report considers GHG to be inherently cumulative and does not propose a separate cumulative assessment. The Inspectorate considers that a cumulative assessment should be undertaken, to take into consideration other plans or projects which could result in significant cumulative GHG emissions.

ID	Ref	Other points	Inspectorate's comments
4.9.4	7.9.16	Climate change resilience baseline	The Inspectorate acknowledges that the resilience to climate change of the existing airport has been previously assessed by GAL through its Adaptation Reporting to Defra under the Climate Change Act 2008. However, it is unclear from the Scoping Report whether the Applicant

ID	Ref	Other points	Inspectorate's comments
			intends to present this information within the ES. For the avoidance of doubt, the Inspectorate considers that the baseline should be presented within the ES, with appropriate referencing to the existing reports.
4.9.5	7.9.16	Gatwick's existing approach to climate change adaptation and resilience	The Scoping Report refers to the existing airport's current approach to climate change adaptation and resilience and refers to the existing Adverse Weather Plan and Flood Management Plan. The ES should explain the applicability of these plans to the assessment of likely significant effects from the Proposed Development and how adherence will be secured.
4.9.6	7.9.21	Future climate conditions	<p>The Inspectorate welcomes the Applicant's intention to source projections for future climate changes from UKCP18 climate change projections. The Inspectorate is aware that updates to UKCP18 data are being released on an ad-hoc basis, (including new local (2.2km) climate projections released in September 2019). The Applicant should ensure that it uses the most up to date information available and should set out the assumptions and uncertainties in all future projections.</p> <p>The ES should explain how future climate conditions have influenced the design of the Proposed Development.</p>
4.9.7	Table 7.9.2	Baseline GHG emissions	The ES should provide a clear definition for each of the different 'scopes' of emissions reported.
4.9.8	Table 7.9.4 and 7.9.52 to 7.9.65	Predicting GHG emissions	<p>Paragraph 7.9.52 states that CO₂ emissions from flights will be reported in line with guidance from the Committee on Climate Change and the Department for Transport, however the specific guidance is not named.</p> <p>The methodology for calculating airplane emissions should be clearly explained within the ES. The Inspectorate acknowledges that</p>

ID	Ref	Other points	Inspectorate's comments
			<p>technological advances of aircraft, and thus changes to emissions, are difficult to predict with confidence. The Inspectorate welcomes the intention to adopt pessimistic, best practice and central projections for future aviation improvements. The Applicant should ensure that the assumptions made in all GHG calculations (for both construction and operational phases) are clearly set out in the ES.</p>
4.9.9	7.9.49-7.9.50	Approach to assessing climate change resilience	<p>The ES should explain how climate change risks relate to the assessment of likely significant effects.</p> <p>Any design commitments that are relied upon to ensure no high risks to the Proposed Development should be appropriately described and secured.</p>
4.9.10	7.9.52	GHG emissions	<p>The Scoping Report states that CO₂ emissions will be reported; no consideration has been given to other GHGs in aviation emissions, including radiative emissions. However, the Scoping Report also explains that all other emissions sources in the GHG emissions assessment will be reported as tonnes of carbon dioxide equivalent (tCO₂e) (in line with IEMA guidance) to present a single metric to reflect the seven GHGs included in the Kyoto protocol.</p> <p>The ES should assess all types of GHGs which have the potential to contribute to a likely significant effect on climate, and clearly set out the conversion methodology and assumptions where tCO₂e metrics are used.</p>
4.9.11	7.9.60	"Worst case" GHG emissions year	<p>Reference is made to a "worst case" GHG emissions year, but not if / how that fits in with the assessment years stated in paragraphs 7.9.55 – 7.9.58. The Inspectorate would expect to see the 'worst case' year presented as a separate assessment scenario which should be considered against a do-nothing scenario for that same year.</p>

ID	Ref	Other points	Inspectorate's comments
4.9.12	7.9.66-7.9.79	Assessment of significance: GHG emissions	<p>The Scoping Report explains that all increases/reductions of GHG are considered significant. This would appear to support the Inspectorate's comments above the need for GHG's to be assessed, and the approach to the assessment explained around tCO2e metrics.</p> <p>Therefore, the difference in GHG emissions from the 'do-nothing' and 'do-something' scenarios will be calculated and will be compared against relevant carbon budgets. The ES should assess the likely significant effects associated with any increase in GHG emissions as a result of the Proposed Development and with reference to relevant legislation and sector specific carbon budgets.</p>
4.9.13	n/a	Mitigation	<p>The Inspectorate acknowledges that mitigation is yet to be determined at this stage but welcomes the identification of potential measures under consideration. The ES should quantify the GHG impacts before and after mitigation to show the anticipated effectiveness of the proposed mitigation.</p> <p>Any mitigation relied upon to reduce the significance of effect should be demonstrably secured.</p>
4.9.14	n/a	Consultation	<p>The Scoping Report does not explain whether any consultation is proposed in relation to this aspect. The Applicant should ensure that consultation bodies with statutory responsibilities for assessment aspects (eg biodiversity and flood risk), such as Natural England and the Environment Agency, are consulted regarding the potential for climate change effects to influence the effectiveness of any proposed mitigation measures.</p>

4.10 Socio-economic Effects

(Scoping Report section 7.10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.10.1	7.10.24	Effects of the Proposed Development on the population during construction and operation	<p>The Scoping Report states that no residential development is proposed, therefore it is not anticipated that there would be any changes to population levels within the assessment area. It further states that future labour demand would be distributed across a wide labour catchment so no significant effects on population levels or housing and community infrastructure needs are expected.</p> <p>The Inspectorate does not consider that sufficient information has been provided to demonstrate that an increase in worker numbers, during both construction and operation, would not affect the demand for housing and community infrastructure.</p> <p>The Inspectorate therefore does not agree that effects on population (including impacts on the housing supply) can be scoped out of the assessment.</p>
4.10.2	7.10.24	Effects of the Proposed Development on Foreign Direct Investment (FDI) and Trade	<p>The Scoping Report explains that there is potentially a positive relationship between investment in transport infrastructure and FDI and trade. However, Government guidance (Department for Transport, 2016) notes that there is not sufficient evidence to quantify the impact of FDI, and as such does not currently provide guidance for the analysis of such impacts. However, the Proposed Development would potentially open up new trading links and bring FDI into the local economy. The proposed methodology for the assessment includes consideration of policy positions and socio-economic objectives of local and regional authorities. The Scoping Report does not explain the extent to which effects on FDI and trade account for the objectives at a local and regional authority level. On</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			this basis, the Inspectorate considers that these matters should be assessed where relevant to that methodology.
4.10.3	7.10.24	Effects of the Proposed Development on property value	<p>The Inspectorate notes that the Applicant considers that property value is affected by multiple drivers and that the Proposed Development is not likely to directly impact on residential or commercial properties outside of the application site and as there would be no changes in flight path therefore the potential for effects to arise is limited.</p> <p>However, the Inspectorate assumes there must be some deviation of existing flight paths from flights departing the northern runway before they join existing routes. In addition, there will be an increase in the frequencies of flights along the existing flight paths. For this reason, the Inspectorate does not agree that effects on property value can be scoped out of the assessment. The ES should assess any likely significant effects associated with the Proposed Development in relation to this matter.</p>

ID	Ref	Other points	Inspectorate's comments
4.10.4	7.10.5	Local study area	The local study area is stated to include areas falling within six local authorities. It is depicted on Figure 7.10.1, however it is unclear if the local study area covers the entirety of these authorities. The local study area should be spatially defined and justified in greater detail in the ES.
4.10.5	7.10.12	Temporal scope	The temporal scope of the assessment is not explicitly set out in the Scoping Report. This should be clearly identified within the ES and made relevant to the assessment years.

ID	Ref	Other points	Inspectorate's comments
4.10.6	7.10.3	Scope of baseline studies	Table 7.10.2 confirms that economic effects would be assessed across the following study areas: local; labour market and five authority areas. The data collected to date and presented in the Scoping Report represent the local study area only. The Applicant should ensure that baseline characteristics of the wider socio-economic area are recorded to enable an assessment of effects to these areas.
4.10.7	7.10.12	Future baseline – economics	The ES should set out details of economic projections applicable to the Proposed Development, which will inform the assessment as well as any assumptions or limitations with the projections and show how these relate to relevant projections for demographic and population change.
4.10.8	Table 7.10.2	Impacts on local labour market	<p>Employment at the airport could exacerbate a shortage of lower skilled workers in the local area and have negative consequences on non-airport related employment sectors. This impact should be assessed within the ES.</p> <p>The ES should provide a breakdown of the numbers and types of jobs that would be created during both construction and operation.</p>
4.10.9	7.10.19	Receptor sensitivity	The Scoping Report states that receptor sensitivity will be based upon the criteria set out in Chapter 6. The definitions of receptor sensitivity set out in Table 6.2.1 are fairly generic and describe receptor importance, rarity, scale and the potential for substitution. It should be clear in the ES how these categories have been applied to socio-economic receptors.
4.10.10	n/a	Effects on GVA	Effects on Gross Value Added (GVA) generated by additional jobs and additional local spend should be assessed in the ES where significant effects are likely to occur.

ID	Ref	Other points	Inspectorate's comments
4.10.11	n/a	Indirect and induced effects	The Applicant should have regard to indirect and induced impacts e.g. to existing supply chains and employee expenditure. The ES should assess these impacts where a likely significant effect is anticipated to occur.

4.11 Health and Wellbeing

(Scoping Report section 7.11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.11.1	7.11.41	Effects on local health care capacity during operational phase	<p>The Scoping Report states that the majority of the operational workforce would originate from within the region, with no material change in demography or associated health care requirements.</p> <p>As noted in Table 4.11 of this Opinion, the Inspectorate does not agree to scope out population impacts during construction or operation; as such and for similar reasons we do not consider that health effects arising from population change should be scoped out of the ES.</p>
4.11.2	7.11.42	Electric and magnetic fields	<p>The Inspectorate notes the Department for Energy and Climate Change (DECC 2012) Voluntary Code of Practice for assessing EMF from electricity distribution infrastructure, concludes that overhead power lines or underground cables operating at ≤ 132 kV are compliant by design with guideline exposure levels set to protect public health. On the basis that any electricity supply infrastructure for the Proposed Development is < 132 kV, the Inspectorate agrees that EMF risk is unlikely to result in significant effects and can be scoped out of the ES.</p> <p>The Inspectorate welcomes that notwithstanding this, the Applicant has committed to address EMF concerns should they be raised during consultation.</p>
4.11.3	7.11.43	Climate change	<p>The Inspectorate agrees that the effects of climate change can be scoped out of the health assessment as they will be addressed within the Climate Change and Carbon chapter of the ES, but would expect</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			to see adequate cross-referencing and signposting to the matter within the health chapter of the ES.
4.11.4	7.11.44 to 7.11.48	Extended operational hazards	<p>The Inspectorate is content that any effects on construction and operational works from major accidents will be considered as part of the assessment of Major Accidents and Disasters and can be scoped out of the health and wellbeing assessment.</p> <p>The Inspectorate is also content that the risk of transmission of communicable diseases is managed through International Health Regulations and can be scoped out of the health assessment. However, the Inspectorate advises that the ES provides an explanation of how the risk is to be controlled.</p> <p>Paragraph 7.11.44 of the Scoping Report states that the impacts of changes to Public Safety Zones will be addressed in the section on Major Accidents and Disasters. However, there is no reference to assessing such changes in section 7.14. As such, the Inspectorate does not agree that risks from changes to public safety zones can be scoped out of the ES.</p>
4.11.5	7.11.49 to 7.11.54	Health risk from pests	<p>The Scoping Report states that all components of the Proposed Development would include pest prevention and control design features and that the CoCP will feature committed actions to prevent and deter pests at construction locations. Once operational, the Proposed Development would be maintained alongside existing pest control programmes and initiatives. The Inspectorate agrees that the Applicants commitments to ensuring controls are in place should be sufficient to ensure significant effects on public health are unlikely and further health assessment of risks from pests can be scoped out.</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			<p>However, given the proposal to include measures within the CoCP, the Inspectorate advises the ES contains a summary of this matter and an explanation of the measures to be provided in the CoCP.</p>
4.11.6	7.11.55 to 7.11.57	Health effects from light	<p>The Scoping Reports states that the lighting strategy will seek to balance lighting to ensure the health and safety of staff and facilitate environmentally sound operations at the site, whilst limiting the impact of light pollution. However, on the basis that the scale and location of any requisite lighting has not yet been determined, the Inspectorate does not consider it possible to rule out any likely significant effects at this stage and therefore does not agree that this can be scoped out.</p>
4.11.7	7.11.58 to 7.11.59	Health and wellbeing of the workforce	<p>The Inspectorate agrees that operational effects on staff wellbeing can be scoped out of the ES as this will be managed in accordance with existing procedures and would be regulated by the Health and Safety at Work Act. However, the Inspectorate advises that the ES contains a summary of this matter along with details on the existing procedures, in order to provide assurances there would be no likely significant effect.</p> <p>The Inspectorate is content that any effects on construction and operational works from major accidents and disasters will be considered as part of the assessment of Major Accidents and Disasters and can be scoped out of the health and wellbeing assessment.</p>

ID	Ref	Other points	Inspectorate's comments
4.11.8	7.11.3	Assessment methodology	<p>The Scoping Report states that in the absence of any explicit guidance relating to the assessment of health and wellbeing in EIA,</p>

ID	Ref	Other points	Inspectorate's comments
			<p>the proposed approach is to apply recognised Health Impact Assessment guidance and combine this with the regulatory requirements for EIA. A number of guidance documents are identified in paragraph 7.11.5. The Inspectorate advises that the assessment methodology is discussed and agreed with relevant consultation bodies prior to the commencement of the assessment.</p>
4.11.9	7.11.17	Study area	<p>The Inspectorate acknowledges that the study area will vary depending on the issue being explored (eg air quality or surface transport). Study areas should be sufficiently broad to account for the transient nature of noise, air, water and vehicle movements. The Applicant is advised to make effort to agree study areas for these different issues with relevant consultation bodies. It should be clear in the text of the ES which study area is being applied to each determinant and effect in the assessment of health impacts. This should include a clear cross reference to the relevant sections of other chapters and, where relevant, the supporting plans in order to assist the reader.</p>
4.11.10	7.11.21 and 7.11.29	Transport related health effects	<p>The ES should consider not only the effects of safety and community connectivity, but also the any likely significant health effects on non-motorised users (for example through losses or changes to Public Rights of Way, open space and the existing road network) and on community severance.</p>
4.11.11	7.11.23	Impacts on water quality, flood risk and ground contamination	<p>Paragraph 7.11.23 proposes to consider the health implications of impacts to water quality, flood risk and ground conditions, where appropriate, however this effect is omitted from Table 7.11.3. For the avoidance of doubt, the Inspectorate considers these impacts should be assessed in the health and wellbeing chapter, where significant effects are likely.</p>

ID	Ref	Other points	Inspectorate's comments
4.11.12	n/a	Sensitive receptors	<p>Whilst the Scoping Report has identified the potential effects to be assessed, it has not identified potential sensitive receptors. These should be identified in the ES, with consideration given to vulnerable groups who might be disproportionately affected by the Proposed Development.</p> <p>The Scoping Report states that receptor sensitivity will be based upon the criteria set out in Chapter 6. It should be clear in the ES how these receptor sensitivity categories in Table 6.2.1 have been applied to socio-economic receptors.</p>
4.11.13	n/a	Additional passenger movements	<p>The ES should assess the impact on local primary health care, acute services and emergency responders from additional passenger movements, where these are likely to result in significant effects.</p>

4.12 Agricultural Land Use and Recreation

(Scoping Report section 7.12)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.12.1	Table 7.12.3	Impacts on the nature and character of recreational resources	Potential impacts from the Proposed Development on the nature and character of recreational resources through disturbance during construction and operation is omitted in the Scoping Report and should be assessed in the ES.

ID	Ref	Other points	Inspectorate's comments
4.12.2	7.12.4 and 7.12.5	Reference dates	The ES should provide the date of when the data that has been used to inform the baseline and assessment was last updated to ensure that the information being used is current.
4.12.3	7.12.14	Referencing	It is unclear from the Scoping Report whether some of the information referred to is provided as a document or figure with the report; this should be made clear through appropriate referencing in the ES and any information deriving from other sources should be appropriately referenced to support credibility of the information provided.
4.12.4	7.12.17	Agricultural Land Classification	Any agricultural land classification should be supported by guidance and accurate, current data and professional judgement in the ES to determine sensitivity of receptors and the degree to which any land temporarily or permanently affected/lost could be considered significant.
4.12.5	7.12.33 and 7.12.6	Additional surveys to be undertaken	Whilst the Scoping Report mentions additional surveys to confirm the initial desk-based data collection including defining the characteristics

ID	Ref	Other points	Inspectorate's comments
			of agricultural land and soil, the scope of user surveys – which should include peak and shoulder periods – and the 'characteristics' of agricultural land and soil structure should be clearly defined in relation to baseline conditions and application of sensitivity of receptors.
4.12.6	7.12.36	Study area	The Scoping Report does not explicitly define the study area and is vague in its description relating to agricultural land stating that the study area will incorporate ' <i>agricultural land located within the project site along with the wider agricultural land holding</i> '. The ES should clearly define a study area based on the ZoI of the Proposed Development with reference to relevant and up to date guidance.
4.12.7	7.12.42 to 7.12.45	Cross Referencing to appropriate Chapters	Where soil excavated for the Proposed Development is to be stored and / or reused, cross reference should be made to other relevant aspect Chapters and the assessment of likely significant effects. For example, climate change in terms of carbon release and landscape and visual in relation to screening from bunds.
4.12.8	Table 7.12.2	Presenting baseline data	Statistics for agricultural land use in 2016 appears to have been grouped for Crawley and Mid Sussex and Reigate and Banstead and Epsom and Ewell when DEFRA provide statistics on a local authority basis. The ES should present data in a clear way to allow for accurate assessment of the likely significant effects and to avoid unintended bias in reporting.

4.13 Waste

(Scoping Report section 7.13)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.13.1	N/A	Waste arising from the extraction, processing and manufacture of the construction materials and components	The Inspectorate agrees that this matter can be scoped out of the assessment. This is on the basis that such matters cannot be accurately predicted and assessed in the ES as they relate to procurement decisions that cannot be assured; however, the Inspectorate notes that the Applicant would implement sustainable procurement practices in line with the relevant principles and requirements of BREEAM (to be detailed within the Sustainability Strategy that will accompany the Application).

ID	Ref	Other points	Inspectorate's comments
4.13.2	7.13.4 to 7.13.6	Baseline	The baseline in the ES should include the current levels of waste being produced by the current airport operation and how such waste is being managed as well as the current levels of waste being managed by individual facilities.
4.13.3	7.13.10	Cross referencing	The Scoping Report identifies that impacts of breaking up concrete will need to be cross referenced to the Air Quality assessment. The ES should also cross reference other relevant aspect Chapters such as ecology and noise and vibration.
4.13.4	7.13.11	Relocation of the CARE facility	Since the CARE facility processes airport waste, the ES should set out how waste would be managed during the relocation of the CARE facility and assess any potential impacts and effects arising from this.

ID	Ref	Other points	Inspectorate's comments
4.13.5	7.13.15	Management Plans	<p>The Scoping Report states that management plans will be provided with the ES. Where the ES relies upon mitigation measures that would be secured through these plans, it should be clear how each measure is secured. The ES should set out the measures necessary to mitigate effects required in the management plans.</p>

4.14 Major Accidents and Disasters

(Scoping Report section 7.14)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.14.1	7.11.44	Public Safety Zones (PSZ)	<p>As discussed in section 4.12 of this Scoping Opinion, the Applicant seeks to scope out health and wellbeing implications on PSZ on the basis that such matters will be considered as part of the assessment of major accidents and disasters. The Inspectorate notes that section 7.14 of the Scoping Report and Appendix 7.14.1 do not expressly mention PSZ.</p> <p>Where significant effects are likely to occur, this should be specifically assessed in the ES with cross reference between aspect chapters of the ES where relevant.</p>
4.14.2	Appendix 7.14.1	Scoping Outcomes for Potential Major Accident and Disaster Events	<p>Appendix 7.14.1 presents a list of all major accidents and disasters considered by the Applicant during construction and operation of the Proposed Development and the sequential 4-staged approach that has been followed. Where the Applicant has sought to scope out certain matters, these are considered in the following rows.</p>
4.14.3	Appendix 7.14.1	Events with no source-pathway-receptor linkages	<p>The Inspectorate is content that the effects associated with the following matters are unlikely to represent significant major accident and disaster events and can be scoped out of the assessment:</p> <ul style="list-style-type: none"> • Flooding (coastal and tidal); • Tsunami; • Storm surge; • Volcanic eruption; • Dam failure; and

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			<ul style="list-style-type: none"> Displaced population.
4.14.4	Appendix 7.14.1	Events not classified as major accidents or hazards	Damage to important artefacts and aircraft wake vortex have been scoped out by the Applicant on the basis that they do not fall under the definition of 'major accidents and disasters' and the Inspectorate agrees with this conclusion and that these matters can be scoped out.
4.14.5	Appendix 7.14.1	No increase to risks compared to existing situation (scoping test 3)	<p>The Applicant seeks to scope out the following on the basis that there is no increase to risks compared to existing situation</p> <ul style="list-style-type: none"> Lightning strikes (the Inspectorate agrees that it should be scoped in for operational effects, but that this conclusion should also be applied in respect of construction effects); Infectious diseases (human and animal epidemics and pandemics); Drought; Famine and food security; Severe space weather; Terrorism and malicious biological and chemical attacks (including sabotage and vandalism); Industrial action; Widespread public disorder; Cyber-attacks; Explosion / structural collapse / excavation failure at neighbouring sites;

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			<ul style="list-style-type: none"> • Rail accidents (the Inspectorate agrees that it should be scoped in for construction effects, but that this conclusion should also be applied in respect of operational effects); and • Occupational hazards. <p>The Inspectorate does not consider that sufficient consideration or detail has been given to the impacts of the Proposed Development in order to definitively conclude that all of the above matters will be 'no worse' than the existing situation. The Inspectorate therefore does not agree to scope these matters out.</p> <p>The ES should include details of the current systems in place to address impacts for these matters and describe any changes required to account for the Proposed Development. Where significant effects are likely to occur, this should be assessed in the ES.</p>
4.14.6	Appendix 7.14.1	Adequate protocols or measures already in place to mitigate risks (scoping test 4)	<p>The Applicant seeks to scope out the following on the basis that adequate protocols or measures already in place to mitigate risks:</p> <ul style="list-style-type: none"> • Extreme heat and cold (including snow, ice and hail) <ul style="list-style-type: none"> - Instrument failure - Cold embrittlement - Runway excursion - Impairment of major accident emergency services • Damage to aircraft during extreme storms • Ash clouds • Aircraft accidents on the runway • Aircraft accidents (airbourne)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			<p>The Inspectorate does not consider that sufficient information regarding the existing protocols being relied upon has been provided. It is also not explained at this stage what (if any) changes would be required to the protocols in light of the changes during construction and operation associated with the Proposed Development.</p> <p>The Inspectorate also notes comments in respect of the airspace change in this regard, and that consideration of major accidents would need to reflect such changes to any existing protocols that are being relied upon (particularly around aircraft accidents).</p> <p>The ES should include a definition of the current systems in place to address impacts for these matters (and explain any changes that may be required to those current systems). Where significant effects are likely to occur, this should be assessed in the ES.</p>
4.14.7	Appendix 7.14.1	Scoping out of major accidents and disasters of the basis of scoping tests 3 and 4	<p>The Applicant explains that the scoping tests are 'sequential', and yet the following are listed in Appendix 7.14.1 as not meeting scoping tests 3 or 4. The Inspectorate understood that where test 3 was not met there would be no need to consider test 4.</p> <ul style="list-style-type: none"> • Drones and lasers; • External objects (bird strike, fireworks, sky lanterns and wind turbines); • Deficient emergency planning; • Loss of utilities (operation); • Loss of essential air safety or airside systems; and • Deficient security provisions. <p>The Inspectorate does not agree that these matters can be scoped out at this stage for the same reasons given in 4.14.4 and 4.14.5</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			above. Those reasons are that insufficient information regarding the existing protocols being relied upon has been provided (and what (if any) changes would be required to the protocols in light of the Proposed Development), and that it cannot be definitively concluded at this stage that all of the above matters will be 'no worse' than the existing situation.
4.14.8	Appendix 7.14.1	Unexploded ordnance	The Inspectorate agrees that unexploded ordnance during operation can be scoped out of the assessment, given that such matters will be assessed and, where applicable, assessed and managed during the construction phase.

ID	Ref	Other points	Inspectorate's comments
4.14.9	List the comments in order.	Major accidents and disaster study areas	<p>Whilst the Inspectorate notes there is currently, no well-established guidance or standard for assessment of major accidents and disasters within EIA, there is little justification for the study areas selected (10 km for "wider events" related to airspace and 1 km for ground-based/on-site events) beyond the use of expert judgement.</p> <p>The Applicant also states that the study areas may need to be amended should such a need be highlighted during the assessment process. The ES should clearly evidence and justify the final extent of the study area(s) used in the assessment of this aspect. Based on the description of some of the identified 'events', the Inspectorate does not consider arbitrary distances should be applied. The study area should be sufficient to encompass the extent of the anticipated impacts and the likely significant effects of the Proposed Development from the perspective of major accidents and disasters. The Applicant</p>

ID	Ref	Other points	Inspectorate's comments
			should make effort to agree the approach with relevant consultation bodies.

4.15 Cumulative Effects and Inter-relationships

(Scoping Report section 7.15)

ID	Ref	Other points	Inspectorate's comments
4.15.1	7.15.12	ZoIs	<p>The Inspectorate recognises that a number of the ES aspect chapter study areas are yet to be fully defined for the purposes of the assessment (and by extension, the cumulative assessment).</p> <p>Table 7.15.2 defines specific ZoIs for each aspect, using "<i>used industry specific guidance along with professional judgement and knowledge of the local area</i>". The ES should specifically justify the definition of each of these ZoIs, particularly where subjective judgements are made based on local knowledge (which should be fully explained in each case).</p> <p>For example, the ZoI for European designations will need to be established in light of transport and air quality modelling work which may require it to be extended beyond the 20km currently stated.</p>
4.15.2	n/a	Heathrow expansion	<p>The Inspectorate notes the Applicant's references to the relevance of Heathrow in terms of predicted future changes in passenger and cargo movements at the Proposed Development (eg section 4.5 of the Scoping Report). The implications of Heathrow's expansion should be fully identified and explored in terms of potential for significant cumulative effects across relevant aspect chapters.</p> <p>Although the project at Heathrow is outside of the 15km 'Zone of Influence' (as defined in table 7.15.3), the Inspectorate considers that an increase in night flights associated with the Proposed Development (combined with Heathrow expansion and any airspace change) could impact residential amenity (and other aspects) of communities and other receptors adjacent to Gatwick Airport. The Inspectorate also expects there will be a degree of overlap in the</p>

ID	Ref	Other points	Inspectorate's comments
			<p>strategic level transport modelling for both projects which will also need to be addressed within the ES.</p> <p>The Inspectorate also considers, based on the information presented in Section 5.3 of the Scoping Report, that there could be a temporal and spatial overlap between construction phases at both airports which could result increase in cumulative increases in HGV movements on the strategic road network and knock on effects to noise and air quality.</p> <p>The Inspectorate expects the consideration of cumulative effects between the Proposed Development and Heathrow expansion to include consideration of the construction as well as operational phases.</p>
4.15.3	7.5.18	Finalisation of the list of cumulative developments	<p>As set out in the AN17, where new 'other development' comes forward following the Applicant's stated assessment cut-off date (3 months prior to submission), the Examining Authority may request additional information during the Examination in relation to effects arising from such development. The Applicant should be aware of the potential need to conduct further assessments and provide more information.</p>
4.15.4	Appendix 7.15.1	Cumulative Long List	<p>Crawley Borough Council and West Sussex County Council have highlighted the need for the Homes England "West of Ifield" development (10,000 homes) to be considered as part of the cumulative assessment, and the Inspectorate agrees that this should be specifically considered both as a receptor of and a contributor towards potential cumulative effects of the Proposed Development.</p>
4.15.5	Appendix 7.15.1	Cumulative Long List	<p>Surrey County Council highlight a number of recently permitted minerals developments and allocated minerals sites (which would qualify as 'major development' against the Applicant's criteria). The</p>

ID	Ref	Other points	Inspectorate's comments
			Applicant should consider inclusion of these developments in the 'long list' of cumulative schemes or otherwise justify their exclusion.
4.15.6	Appendix 7.15.1	Cumulative Long List - Horley Employment Park -	<p>Appendix 7.15.1 identifies the Horley Employment Park as a "tier 3" scheme. The comments of Reigate and Banstead Borough Council refer to the Development Management Plan DMP (and strategic business park land allocation) having been formally adopted on 26 September 2019, and that the Applicant's position throughout the examination of the DMP was that <i>"there was a requirement for a grade separated junction to accommodate the business park growth irrespective of any additional growth proposed at the airport"</i>.</p> <p>The ES should consider the potential for cumulative effects of the scheme as well as any influence of the Employment Park scheme on the design of the Proposed Development, with particular regard to assessment assumptions around:</p> <ul style="list-style-type: none"> • Proposed end uses of the site (in the absence of a masterplan for the Employment Park); and • Construction phasing (given that construction is estimated to take place over a twenty-year period).

4.16 Matters Proposed to be Scoped Out

(Scoping Report Chapter 8)

ID	Ref	Applicant's proposed aspect to scope out	Inspectorate's comments
4.16.1	6.4.3	Sustainability Chapter of the ES	<p>A Sustainability Statement will be provided as a separate report to accompany the application, and relevant information from that document will be included within the ES. Aspect chapter assessments from the ES will inform the sustainability strategy as required.</p> <p>The Inspectorate agrees that a separate sustainability chapter of the ES is not required on the basis that 'sustainability' is not an aspect specifically identified or required by the EIA Regulations.</p>
4.16.2	8.3	Material Assets	<p>The Inspectorate agrees that a separate assessment of Material assets can be scoped out of the assessment on the basis that relevant matters in relation to this aspect are proposed to be assessed in other relevant aspect chapters within an ES (eg geology and ground conditions, waste, socio-economic and historic environment chapters).</p>
4.16.3	8.4	Radiation and Heat	<p>Although radiation is used within airports (as part of the security screening process), these are subject to separate regulation and the Proposed Development would not introduce any new sources of radiation or include any sources of radiation not already in use at the airport. The Inspectorate agrees that a standalone assessment of radiation effects is not required as significant effects are unlikely to occur and where relevant, such matters are to be addressed by the assessment of major accidents and disasters.</p> <p>In terms of heat, the Inspectorate notes that the Proposed Development would include some changes to the provision of power within the site. No reference is given to thermal emissions from</p>

ID	Ref	Applicant's proposed aspect to scope out	Inspectorate's comments
			<p>increased ATMs as part of the justification for heat effects being scoped out.</p> <p>Given that the parameters and specification of additional heating and power plant that may be required are yet to be defined, and that modelling of ATMs is ongoing (with limited reference to potential thermal effects), the Inspectorate does not agree to scope this matter out. The ES should assess impacts from increased heat (including 'heat island' effects) where significant effects are likely to occur.</p>
4.16.4	8.5	Daylight, Sunlight and Microclimate	<p>The Inspectorate agrees that the Proposed Development is not likely to have significant effects in relation to daylight and sunlight.</p> <p>The operational air quality assessment findings are unknown at this stage (in particular effects of the increased ATMs, road traffic and biomass boiler on local air quality), and as a result the Inspectorate does not agree that microclimatic effects can be scoped out. Where significant effects are likely to occur (as may be demonstrated by the emerging air quality assessment), microclimatic effects should be assessed within the ES.</p> <p>It is also noted that the effects of the Proposed Development on climate change will be assessed separately in a Climate Change and Carbon chapter of the ES, as described in Section 7.9</p>
4.16.5	8.6	Decommissioning Effects	<p>Having regard to the nature and characteristics of the Proposed Development the Inspectorate agrees that decommissioning can be scoped out of the ES on the basis that, once operational, it would form part of a permanent airport and no activities are proposed that would require decommissioning. Paragraph 7.15.27 of the Scoping Report describes that consideration will be given to inter-related effects during decommissioning, but it is assumed that this is an erroneous reference.</p>

ID	Ref	Applicant's proposed aspect to scope out	Inspectorate's comments
			<p>However, the Inspectorate does consider that the ES should assess impact from decommissioning of infrastructure elements predicted to be have a shorter life expectancy and that may be subject to continued maintenance / replacement as part of the management of the airport and where significant effects are anticipated to occur. The ES should assess the potential for likely significant effects to arise in relation to these elements.</p>
4.16.6	8.7	Airspace Change Process	<p>This is considered separately in section 2.3 of this Scoping Opinion.</p> <p>For the avoidance of doubt the Inspectorate does not agree that the Airspace Change process (FASI-S and / or airspace change to enable dual runway operations) can be scoped out of the assessment at this stage.</p> <p>The Inspectorate understands that the current timeframe for the FASI-S airspace change will be to implement change from 2024/25 (prior to the introduction of the dual runway operations of the Proposed Development). Whilst the outcomes and timescales of such a process remain uncertain, it cannot be scoped out of the ES given that changes to airspace use and flight paths will have a direct influence on the assessment of effects in relation to the Proposed Development.</p> <p>The Inspectorate also notes the consultation response of the CAA whose preliminary view is that there may be no need for a full airspace change process for reconfiguration of the northern runway, but that a Statement of Need in that regard would be required independent of any requirement under FASI-S arrangements.</p> <p>Given that the proposed dual runway operation could result in a planned and permanent redistribution of traffic or airspace change process, the Inspectorate expects that the metrics and analysis used</p>

ID	Ref	Applicant's proposed aspect to scope out	Inspectorate's comments
			to inform the assessment process are consistent with that set out under CAP1616 guidance.

5. INFORMATION SOURCES

5.0.1 The Inspectorate's National Infrastructure Planning website includes links to a range of advice regarding the making of applications and environmental procedures, these include:

- Pre-application prospectus⁸
- Planning Inspectorate advice notes⁹:
 - Advice Note Three: EIA Notification and Consultation;
 - Advice Note Four: Section 52: Obtaining information about interests in land (Planning Act 2008);
 - Advice Note Five: Section 53: Rights of Entry (Planning Act 2008);
 - Advice Note Seven: Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements;
 - Advice Note Nine: Using the 'Rochdale Envelope';
 - Advice Note Ten: Habitat Regulations Assessment relevant to nationally significant infrastructure projects (includes discussion of Evidence Plan process);
 - Advice Note Twelve: Transboundary Impacts;
 - Advice Note Seventeen: Cumulative Effects Assessment; and
 - Advice Note Eighteen: The Water Framework Directive.

5.0.2 Applicants are also advised to review the list of information required to be submitted within an application for Development as set out in The Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009.

⁸ The Planning Inspectorate's pre-application services for applicants. Available from: <https://infrastructure.planninginspectorate.gov.uk/application-process/pre-application-service-for-applicants/>

⁹ The Planning Inspectorate's series of advice notes in relation to the Planning Act 2008 process. Available from: <https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES¹⁰

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Health and Safety Executive	Health and Safety Executive
The National Health Service Commissioning Board	NHS England
The relevant Clinical Commissioning Group	NHS East Surrey Clinical Commissioning Group
	NHS Surrey Downs Clinical Commissioning Group
	NHS Crawley Clinical Commissioning Group
Natural England	Natural England
The Historic Buildings and Monuments Commission for England	Historic England
The relevant fire and rescue authority	Surrey Fire and Rescue
	West Sussex Fire & Rescue Service
The relevant police and crime commissioner	Surrey Police and Crime Commissioner
	Sussex Police & Crime Commissioner
The relevant parish council(s) or, where the application relates to land [in] Wales or Scotland, the relevant community council	Burstow Parish Council
	Horley Town Council
	Charlwood Parish Council
The Environment Agency	The Environment Agency
The Civil Aviation Authority	Civil Aviation Authority
The Relevant Highways Authority	West Sussex County Council

¹⁰ Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the 'APFP Regulations')

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Surrey County Council
The relevant strategic highways company	Highways England
Transport for London	Transport for London
Public Health England, an executive agency of the Department of Health	Public Health England
The Crown Estate Commissioners	The Crown Estate
The Forestry Commission	The Forestry Commission for South East & London
The Secretary of State for Defence	Ministry of Defence

TABLE A2: RELEVANT STATUTORY UNDERTAKERS¹¹

STATUTORY UNDERTAKER	ORGANISATION
The relevant Clinical Commissioning Group	NHS East Surrey Clinical Commissioning Group
	NHS Surrey Downs Clinical Commissioning Group
	NHS Crawley Clinical Commissioning Group
The National Health Service Commissioning Board	NHS England
The relevant NHS Foundation Trust	South East Coast Ambulance Service NHS Foundation Trust
Railways	Network Rail Infrastructure Ltd
	Highways England Historical Railways Estate
Road Transport	Transport for London

¹¹ 'Statutory Undertaker' is defined in the APFP Regulations as having the same meaning as in Section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
Civil Aviation Authority	Civil Aviation Authority
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes England
The relevant Environment Agency	The Environment Agency
The relevant water and sewage undertaker	Sutton and East Surrey Water (SES Water)
	Thames Water
	Thames Water Commercial Services
The relevant public gas transporter	Cadent Gas Limited
	Energetics Gas Limited
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	ESP Networks Ltd
	ESP Pipelines Ltd
	ESP Connections Ltd
	Fulcrum Pipelines Limited
	Harlaxton Gas Networks Limited
	GTC Pipelines Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Murphy Gas Networks limited
	Quadrant Pipelines Limited
National Grid Gas Plc	
Scotland Gas Networks Plc	

STATUTORY UNDERTAKER	ORGANISATION
	Southern Gas Networks Plc
The relevant electricity distributor with CPO Powers	Eclipse Power Network Limited
	Energetics Electricity Limited
	Energy Assets Networks Limited
	Energy Assets Power Networks Limited
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited
	Harlaxton Energy Networks Limited
	Independent Power Networks Limited
	Leep Electricity Networks Limited
	Murphy Power Distribution Limited
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Vattenfall Networks Limited
	London Power Networks Plc
South Eastern Power Networks Plc	
UK Power Networks Limited	
National Grid Electricity Transmission Plc	

TABLE A3: SECTION 43 CONSULTEES (FOR THE PURPOSES OF SECTION 42(1)(B))¹²

¹² Sections 43 and 42(B) of the PA2008

LOCAL AUTHORITY¹³
Bracknell Forest Council
Brighton and Hove City Council
Crawley Borough Council
East Sussex County Council
Elmbridge Borough Council
Epsom & Ewell Borough Council
Guildford Borough Council
Hampshire County Council
Horsham District Council
Kent County Council
London Borough of Bromley
London Borough of Croydon
London Borough of Hillingdon
London Borough of Hounslow
London Borough of Richmond upon Thames
Mid Sussex District Council
Mole Valley District Council
Reigate and Banstead Borough Council
Sevenoaks District Council
Slough Borough Council
South Downs National Park Authority
Surrey County Council
Sutton Council

¹³ As defined in Section 43(3) of the PA2008

LOCAL AUTHORITY¹³

Tandridge District Council

The Royal Borough of Kingston upon Thames

The Royal Borough of Windsor & Maidenhead

Waverley Borough Council

Wealden District Council

West Sussex County Council

THE GREATER LONDON AUTHORITY

ORGANISATION

The Greater London Authority

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Burstow Parish Council
Civil Aviation Authority
Charlwood Parish Council
Crawley Borough Council
London Borough of Croydon
East Essex County Council
Elmbridge Borough Council
Environment Agency
Epsom & Ewell Borough Council
Forestry Commission
Harlaxton Gas Networks Limited (and Harlaxton Energy Networks Limited)
Highways England
Historic England
Horley Town Council
Horsham District Council
Health and Safety Executive
Kent County Council
Mid Sussex District Council
Mole Valley District Council
National Grid Electricity Transmission Plc (and National Grid Gas Plc)
NATS En-Route Plc
Public Health England

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Reigate and Banstead Borough Council
South Downs National Park Authority
Surrey County Council
Tandridge District Council
Transport for London
Thames Water
Waverly Borough Council
Wealden District Council
West Sussex County Council

BURSTOW PARISH COUNCIL

www.burstowparishcouncil.org.uk

Centenary Hall, Wheelers Lane, Smallfield, Surrey RH6 9PT 01342 841880

Chairman
Ian Wates

Clerk to the Council
Jeannie Ryan
burstowpc@btconnect.com

28th September 2019

Dear Sir,

GATWICK AIRPORT NORTHERN RUNWAY SCOPING OPINION

INTRODUCTION

1. Burstow Parish Council welcomes the opportunity to comment on the Gatwick Airport Northern Runway proposed development scoping opinion consultation. Before referring to the possible individual impacts it needs to be understood what area is covered by the Parish Council.
2. Relevant to the east of the airport, the Parish starts from the edge of Copthorne village and, going due north, passes across Keepers Corner into Redehall Road and so to the centre of Smallfield. The current flightpath passes across the southern end of Redehall Road and above Burstow Parish Church, less than 2 miles from touchdown.
3. However, with the Northern Runway in use on a regular basis, many more residents would be subjected to noise over a much larger area of Smallfield. This is an unsatisfactory situation as there are far less homes affected currently as none have been built under the flightpath since the airport became a commercial enterprise.
4. What is even worse is that more noise complaints are received by Gatwick Airport these days due to the number of movements even though aircraft are decidedly quieter. With the prediction of Gatwick Airport Limited that the number of ATMs will increase from 280,700 in 2017/18 to 300,000 in 2022/23, an increase of 6.9% is not very welcome for the residents close to the airport. It is to be hoped that the Department for Transport do not allow any increase in night movements.
5. Because of the types of aircraft that use Gatwick, there are likely to be more of those that are suitable for a shorter runway so the difference of a maximum 53mppa for one runway versus 61mppa by using both is likely to exceed the difference of 8mppa on the northern runway. This figure will be much greater if the 2032 figure of 68-70mppa is achieved.
6. The residents of our Parish have been very consistent with their acceptance of the airport and its benefits and disbenefits even though they are affected by both arrivals and departures. To put an extra burden on more residents who did move into their current homes with knowledge of where the aircraft were likely to continue flying is asking for complaints to commence from a new quarter. I am not sure that even mitigation would be acceptable with this scenario but, at least, this should be offered in some form.
7. Burstow Parish Council believes there is a need to consider the knock on effects that using the Northern runway will bring with new housing. Under the Tandridge Local Plan proposals, more housing is likely to be located in Smallfield and might conceivably be built under the flightpath of the northern runway.
8. It is assumed that an airspace change process under CAP1616 will be necessary if the emergency runway is brought into scheduled operation as Routes 3 and 4 will surely follow a different SID than the aircraft using the main runway. If this is the case, more people than those living in the Parishes directly east and west of the short runway will be affected with the wraparound turns.
9. It is accepted that Gatwick Airport is economically very important to this area of the south east and long may it continue to serve business, jobs and customers alike but it would appear to us that the proposed increased use of the Northern runway is not a viable proposition for either Burstow Parish Council to the east or Charlwood Parish Council to the west.
10. Although not being considered in this environmental assessment, as the land to the south is being safeguarded for the possible full length second (southern) runway, it would seem more sensible to be pursuing this course of action, even though it was not recommended by either the Davies'

Commission or the Government. It is apparent that another main runway will be required very soon, and before the new Heathrow third runway is completed, if the number of airline customers continues to rise.

11. Whilst the economic benefits of an expanding airport are understood, it cannot be taken in isolation. The general surface transport infrastructure gives cause for alarm as both the rail and road links are already over-crowded. The M23 Smart motorway is being constructed for today's traffic because so much congestion already occurs so will be inadequate for the proposed expansion despite the protestations to the contrary that there will only be a 1% increase per year over the next 10 years (Para. 4.4 31 in Gatwick Master Plan).
12. Network Rail have tried to squeeze every drop of timetable utilization out of the main London-Brighton line that has included losing most of the dedicated 'premium' services of the Gatwick Express since extending many of the train services to Brighton. This service must be allowed to return to a dedicated service in any expansion. Reference to the premium Gatwick Express (para.4.4.24 in Gatwick Master Plan) is therefore very much in dispute.
13. Some joined-up thinking will be necessary with government departments in order to improve the surface access infrastructure mentioned above. Both the A22 and A23 roads need upgrading to dual carriageways in many places in order to help avoid the massively increased use of country lanes that is already being experienced.
14. A further concern for this proposed development regards major accidents and disaster events. These concerns are laid out below and include a reason why Burstow Parish Council is raising this issue.
15. In summary, Burstow Parish Council wishes to comment more fully on the three issues of noise, road infrastructure and potential accidents.

NOISE OVER MORE RESIDENTS WITHIN THE PARISH

As mentioned in the Introduction, relevant to the east of the airport, the Parish starts from the edge of Cophorne village and, going due north, passes across Keepers Corner into Redehall Road and so to the centre of Smallfield. The current flightpath passes across the southern end of Redehall Road and above Burstow Parish Church, less than 2 miles from touchdown.

However, with the Northern Runway in use on a regular basis, many more residents will be subject to noise over a much larger area of Smallfield. This is an unsatisfactory situation as there are far less homes affected currently as none have been built under the one runway flightpath since the airport became a commercial enterprise.

What is even worse is that more noise complaints are received by Gatwick Airport these days due to the number of movements even though aircraft are decidedly quieter. The airport's prediction is that the number of ATMs will increase from 280,700 in 2017/18 to 300,000 in 2022/23, an increase of 6.9% so that is not very welcome for the residents close to the airport. Furthermore, they anticipate reaching 375,000 to 390,000 ATMs by 2032/33 with 68 to 70 mppa. This would be an enormous increase of passengers from today of up to 38.9%. It is to be hoped that the Department for Transport do not allow any increase in night movements

The residents of our Parish have been very consistent with their acceptance of the airport and its benefits and disbenefits even though they are affected by both arrivals and departures. To put an extra burden on more residents who did move into their current homes with knowledge of where the aircraft were likely to continue flying is asking for complaints to commence from a new quarter. We are not sure that even mitigation would be acceptable with this scenario but, at least, this should be offered in some form due to the loss in value of properties.

ROAD AND RAIL INFRASTRUCTURE

Whilst Gatwick Airport provide huge economic benefits to the region there is a lack of infrastructure investment to support it. There is one main railway line between London and Brighton that runs via the airport and must be the busiest line in the country with London bound commuters as well as the airport passengers and staff. Gatwick have been working hard to meet their environmental objectives of achieving a high rate of public transport usage so the airport plays an important role in this. We are encouraged to finally see an investment of £150million in the airport station which has been badly needed for several years and is a poor advertisement to many foreign passengers seeing the United Kingdom for the first time. Of this investment, GAL is providing £40million. However, the incentive of using the dedicated Gatwick Express service has been removed for much of the 24 hour period since many of the trains now travel between London and Brighton and deny airport passengers the comfort they deserve when paying premium fares.

With all the housing construction taking place all around and nearby the airport, even more passengers will want to use the overcrowded trains. The regulatory Body should be considering how to increase the number of lines through an alternative route for flexibility purposes as well as catering for the extra passengers.

The road infrastructure needs a radical overhaul as it is not fit for purpose for this area. Little or no infrastructure investment is being provided by central government in probably the most economic productive area of the UK. Great play has been made of the M23 motorway being upgraded to a SMART motorway but that is long overdue for current requirements, let alone with another 20 million passengers passing through the airport in the next decade together with residents in all the new homes being constructed.

Burstow Parish Council are very concerned already with the increasing number of vehicles passing through the village along B and C class roads – and that includes large lorries trying to avoid hold-ups on other A roads. Apart from the M23 there are only two north to south A-class roads (A22 and A23) neither of which is substantial and both are heavily utilised, so traffic understandably looks for alternative routes. These A roads need to be upgraded to dual carriageways and certainly, the A22 will have very much more traffic if the new village at South Godstone is approved under the Tandridge District Council Local Plan.

TRANSPORT ACCIDENT AIRBORNE AND GROUND

It might seem strange that Burstow Parish Council should be considering this issue but it will be seen that there is some logic why it should be raised by us.

The scoping document does cover the decision making process in diagram 7.14.1 and the Safety Risk Assessment Matrix in diagram 7.14.2 within the main document.

Regarding the possible accidents on the ground (i.e. runway, taxiway and apron), this is declared as being covered by various regulatory documents but there is some concern about exit taxiways from the main runway heading towards the northern runway when an aircraft maybe departing on it as surely there will be insufficient separation from arriving and departing aircraft?

It is believed that departing aircraft from the northern runway will veer onto the main runway departure path when flying on the routes 3 and 4 in order to complete the turn on the established NPRs, otherwise they would be flying north of the current NPR in order to achieve the turn. Under normal operational conditions this will not be a problem as aircraft would not be departing on both runways at the same time but arriving aircraft would be slowing to exit the runway. For various operational reasons, landing aircraft on the main runway may need to go-around so could be overflying the runway just as an aircraft is departing from the northern runway on a route 4. Surely this could be a scenario for a collision or near-miss. A similar scenario could occur with an aircraft arriving from the west on the northerly runway having to go-around when an aircraft is departing on the main runway.

Either of these scenarios could respectively affect either Charlwood to the west or Burstow to the east with disastrous consequences.

Having said all this, we feel sure that the regulatory Bodies like the Department of Transport (Aviation) and the Civil Aviation Authority will be looking into this potential situation.

Yours faithfully,

Alan Jones
Burstow Parish Council
(GATCOM & NATMAG Representative)

Mr R Kent
Senior EIA and Land Rights Advisor
The Planning Inspectorate
Major Casework Directorate
Temple Quay House
2 The Square
Bristol BS1 6PN

Civil Aviation Authority's response to Gatwick Airport Limited's Environmental Impact Assessment Scoping Report

30 September 2019

Introduction

1. The CAA is the UK's specialist aviation regulator. We work so that:
 - the aviation industry meets the highest safety standards. We regulate the safety of airport design against UK, European and international safety criteria.
 - consumers have choice, value for money, are protected and treated fairly when they fly. We regulate (currently through a set of 'commitments' which expire in March 2021) the costs of operating Gatwick airport and certain service quality targets.
 - airspace is well managed. We make decisions on proposals to change airspace design, which we do against the background of Directions¹ and environmental guidance from the Secretary of State.
 - the aviation industry manages security risks effectively.
2. We also provide the government, and third parties on a commercial basis, with environmental advice as requested, including information about the noise effects of aviation operations. In general, it is for government to determine environmental policy and for the CAA, where required, to implement such policy as it relates to our functions.
3. We welcome the opportunity to respond to Gatwick Airport Limited's (GAL) Environmental Impact Assessment (EIA) scoping report in our capacity as a prescribed statutory consultee in the planning process.
4. By way of general introductory comment, in paragraphs 6 to 17 we provide a high-level overview of our regulatory roles and how they relate to the Development Consent Order (DCO) process. In paragraphs 18 to 21 we explain how we approached our consideration of GAL's EIA scoping report. In paragraphs 22 to 39 we provide such comments as we have at this stage on those chapters of GAL's EIA scoping report that relate to the CAA's regulatory roles.
5. For further information about the CAA's responsibilities or on any of our comments in this paper, please contact us at DCO.Coordination@caa.co.uk.

The DCO and CAA's Regulatory Processes

6. In addition to obtaining a DCO, GAL will also be required to obtain a number of regulatory approvals from the CAA in order for the northern runway to be used as proposed. The CAA's regulatory approval processes will continue throughout the planning and construction phases. The environmental statement that will form part of GAL's DCO application will contain topics which are relevant to the CAA's regulatory processes. The most significant regulatory areas are as follows.

¹ The Civil Aviation Authority (Air Navigation) Directions 2017 (as amended by The Civil Aviation Authority (Air Navigation) (Amendment) Directions 2018)

Economic Regulation

7. The CAA is the economic regulator of GAL. In carrying out our economic regulation the CAA's primary duty, as set out in s. 1(1) of the Civil Aviation Act 2012 (the CAA12), is to carry out its functions "in a manner which it considers will further the interests of users of air transport services regarding the range, availability, continuity, cost and quality of airport operation services". The other matters to which we must have regard are set out in s.1(3) of the CAA12, including (in S.1.(3)(d)) that we should have regard to the need to secure that GAL can take reasonable measures to reduce, control or mitigate the adverse environmental effects of the airport and associated facilities.

Safety Regulation

8. The CAA has a number of safety oversight responsibilities in the UK. The CAA oversees the safety of aircraft and air navigation, the control of air traffic, air traffic services personnel, the licensing of aerodromes and air crew.
9. The CAA is the national supervisory authority for the certification of air navigation services (ANS) providers covering the requirements of Regulation (EU) No. 1035/2011. Those requirements include technical and operational competence and capability, specific requirements for the provision of air traffic services, meteorological services, aeronautical information services and communication, navigation or surveillance services.
10. The CAA is also the designated competent authority for the licencing of aerodromes under Regulation (EU) No. 139/2014. The licensing process ensures continuous oversight of safety standards at civil aerodromes. Since this regulation came into force in 2014, Gatwick Airport's aerodrome licence has been converted to an EASA compliant licence.
11. Safety assurance of proposed changes can only be provided if the proposer submits to the approving authority a fully detailed concept of operations for how it intends to achieve an acceptable level of safety.
12. It might not be possible to issue some approvals without trialling the operation first. In such circumstances, permission to operate a trial may sometimes be given so that the operator can demonstrate that the concept works as intended (potentially with further mitigating action required to ensure the concept meets all requirements).

Airspace Change

13. The CAA is responsible for making decisions on proposals to change airspace design. As part of that decision-making role, we take into account a range of factors including safety, efficiency and guidance on environmental objectives from the Secretary of State. The evidence we use to consider those factors, and how it should be prepared, is set out in our regulatory process 'Airspace Design: Guidance on the regulatory process for changing airspace design including community engagement requirements' (CAP1616).
14. As set out in the Government's Airports National Policy Statement (ANPS), we expect any airspace changes associated with the northern runway proposals to follow the CAA's airspace change process as set out in our guidance in CAP1616. Our guidance specifies the evidence we need from the organisation sponsoring an airspace change, including the relevant environmental data and the methodologies for producing it.
15. The CAA also has a decision-making role for changes to air traffic control (ATC) operational procedures (which could have similar noise effects to airspace change proposals). Such planned and permanent redistributions of air traffic (PPRs) essentially

concern changes in the way existing airspace is used, rather than changes in the airspace design itself. Only certain PPR proposals (known as ‘relevant PPRs’), which are likely to have a potential noise impact on the ground, will need to go through the approval process. The CAA recently consulted² on the decision-making process it will use for PPRs, with the aim of having it in place by 1 November 2019. The CAA’s proposal is to use a process similar to that in CAP 1616.

Noise

16. The CAA has three key roles concerning aviation noise:
 - Deciding whether or not the design of airspace can be changed (in accordance with government, law and noise policy);
 - Provide technical advice in relation to noise around the London designated airports and publishing information about noise levels and noise exposure;
 - Collaborating on and reviewing research into the effects of noise and how they can be reduced and offering advice to Government on these effects.
17. The CAA also has a duty to publish information on adverse environmental effects of aviation.

CAA’s response to GAL’s EIA Scoping Report

18. To a significant extent, the CAA’s regulatory processes will run in parallel with the DCO process, but not conclude until after the DCO application has been submitted. Accordingly, the CAA may be asked by the Planning Inspectorate (“PINS”) and the Secretary of State to provide an interim opinion regarding the viability of GAL’s scheme.
19. It would therefore be prudent for the EIA scope and methodology to be consistent with the requirements of the CAA’s regulatory processes in order to avoid duplication and aid clarity for stakeholders. Where this is not possible, we suggest that GAL explains its choice of methodology with great care and sets out the difference between the methodology used for EIA purposes and that to be used for the purposes of any submissions seeking CAA approval.
20. We have considered GAL’s EIA scoping report on that basis, and we are using this response to inform PINS of the information we consider should be provided in GAL’s environmental statement. In particular, we have considered GAL’s proposed scope and methodology to assess and mitigate the environmental effects of the project. We have only commented on relevant EIA topics.
21. Our response below contains comments on those aspects of GAL’s EIA Scoping Report that relate to our regulatory roles.

Economic Regulation

22. Our current approach to the economic regulation of GAL is based on relatively light touch arrangements, with airlines and GAL negotiating a set of contractual ‘commitments’ that encompass price and quality of service levels. The evidence that we have at present,

² See <https://consultations.caa.co.uk/policy-development/ppr-decision-making-process/>

including the relative level of competitive pressures on Gatwick and the steps it has taken and is taking to expand capacity suggest that this is a reasonable and proportionate approach.

23. The commitments cover, among other things, the maximum level of airport charges that GAL can levy and a system of rebates if GAL misses certain service quality targets. The current commitments expire in March 2021, and GAL and its airline customers are discussing a proposed new set of commitments that are currently anticipated to last until 2024 or 2025. If agreement can be reached we will check whether the deal makes sense for consumers and look to implement it as conditions of GAL's economic licence (issued by us under s.15 of the CAA12). However, if the airlines and airport cannot reach agreement or we need to take additional steps to protect consumers then we would need to consider making further regulatory interventions.
24. Consistent with our primary duty to protect consumers we consider that GAL should be mindful of, among other things:
 - the efficiency of the costs of GAL's environmental mitigations (which we interpret broadly to include that there is a clear statutory driver on GAL to incur the costs, that GAL has identified the most efficient option and that its costs of delivering such options are efficient);
 - levels of service quality and resilience, both during the construction period and when the northern runway is operational. When we reviewed the impact of GAL's commitments framework in 2016 we identified some potential concerns, including relatively poor levels of on-time performance and GAL's possible slowness in expanding airfield capacity in response to stronger than expected traffic growth.
25. In our role as a Statutory Consultee for GAL's DCO we will need to consider issues relating to economic regulation. We would expect GAL to demonstrate an overall business case for its plans showing how its proposals are in the interests of consumers and are affordable for airlines and financeable. In addition, if GAL is able to bring the present round of negotiations with airlines to a successful conclusion, this will support the existing light touch approach to economic regulation at Gatwick Airport.
26. On a more specific issue, the "indicative phasing" in Table 5.3.1 suggests that work on the new pier (Pier 7) won't take place until 2032-34. However, paragraph 7.6.57 suggests that the peak slots on the new runway are likely to have been filled by 2029. GAL should indicate how it intends to accommodate the increased number of air traffic movements (ATMs) before the new pier is available, and whether there will be any consequential effects on any of the topics considered in the EIA.

Safety Regulation

27. Air travel, as with all other forms of transport, presents safety risks to consumers on board aircraft and the public (third parties).

Safety on board the aircraft (in flight or at the aerodrome)

28. The CAA has the following comments on the aspects of the EIA scoping report relating to safety on board aircraft:

Para No.	Comment
General	At some places throughout the scoping report and its appendices the documents refer to CAP 168: Licensing of Aerodromes (Civil Aviation Authority, 2019) and Articles 211 and 212 of the Air Navigation order, in relation to aerodrome licensing. Gatwick Airport certification is conducted against the requirements of the EU Basic Regulation and its supporting

	regulations, notably EU Regulation 139/2014 (the Aerodrome Regulation). EU regulations are issued by the European Aviation Safety Agency (EASA). CAP 168 is no longer applicable and should be referred to only for guidance should there be no material covering a subject in the EASA issued documents.
4.2.6	The use of existing taxiway Juliet has an aircraft wingspan restriction during present northern runway operations.
5.2.6	The reference to "...a separation distance of 210 metres between it and the main runway, the distance required to meet European Aviation Safety Agency standards for closely spaced parallel runways" is not fully correct. This distance refers to parallel non-instrument runways. The distance for parallel instrument runways is 1036m. EASA does not specify a distance where one runway is instrument and one is non-instrument, as is the situation at Gatwick.
5.2.28	Reference is made to the maximum building height of 9m in the proposed re-provided fire training ground. The existing fire training rig (an aircraft mock-up) has a fin height of 20m. It is suggested that reference be made whether the existing training rig would be repositioned or a new one provided.
7.8.7	The para states that "Only smaller 'Code C' aircraft (ie <36 m wingspan (not Boeing 767 and larger)) would use the northern runway". This should refer to B757 aircraft rather than 767.
7.8.47	The start of the take-off roll for the northern runway in the predominately west direction is over 600m further west than the main runway and de-rated take-off thrust would normally be used so the accuracy of the following statement needs to be challenged: "During routine operations, only departures would use the northern runway. The majority of these would be above 1,000 ft before they leave the airfield".
7.14.7	The list of guidance documents could usefully also include the EU Aerodrome Regulation (139/2014).
Appendices: Transport accident (airborne)	The appendix states "A new Runway End Safety Area (RESA) is proposed to be established for the proposed northern runway usage which would reduce the risk to a tolerable level. Any intolerable risk under Department of Transport guidelines would therefore be designed out". The CAA supports the proposal to implement a new RESA and for that RESA to be of the distance recommended in the EU Regulation 139/2014 (the Aerodrome Regulation).

Public Safety

29. Public or third-party risks are often described as individual or societal risk. In the context of the DCO process, the responsibility for judging the tolerability of public safety lies with the relevant decision maker who is able to weigh the benefits of a proposal against the safety risks. This would include PINS and the Secretary of State in considering the DCO application.
30. The CAA has no specific policy or regulatory role regarding the tolerability of third-party safety risks. The CAA can provide support to aid the assessment or decision maker, such as provision of accident statistics or mandatory occurrence reporting data.
31. In Appendix 7.14.1, the entry for Transport Accident (airborne) justifies scoping out this risk because of the existing CAA/EASA safety requirements, the introduction of a RESA, and because "the proposals would not result in a change to airspace". However, as noted above, the CAA has no regulatory role regarding the tolerability of third-party

safety risks, and so some further evidence should be presented to justify scoping out such risks.

Airspace Change

32. GAL asserts at various points in its EIA Scoping Report that its planned alterations to the northern runway will not require it to submit an airspace change proposal (ACP): for example, paragraph 3.2.10, describing the preferred development scenario, states:

“the airport would remain a two terminal operation [...] and would not require changes to flight paths from the current arrangements.”

However, paragraph 7.8.46 states that:

“the Project does not require changes to the existing flight paths to or from the airport, other than the adjusting of the flightpath to and from the northern runway 12 metres further north. A formal ‘airspace change process’ is unlikely to be required to enable the dual runway operation.”

33. We understand from this that, in GAL’s view, the proposals would not be a change in airspace design since the conventional SIDs for the standby runway, which are already notified, would continue to be used under GAL’s proposed plans.

34. Paragraph 8.7.4 states that:

“Whilst it is considered that an airspace change to enable dual runway operations is unlikely to be required, GAL will submit a Statement of Need within the scope of the CAP1616 process at the appropriate time to the CAA.”

However, it is not clear from the text preceding this paragraph whether the Statement of Need is to be related to FASI- S, or to the application for dual runway operations. This should be clarified by GAL.

35. Based on our current understanding of GAL’s proposals (which has been informed by meetings with GAL as well as the EIA Scoping Report), our preliminary view is that GAL are correct to assume that there may be no need to go through the full airspace change process for reconfiguration of the northern runway. However, we would expect GAL to submit a Statement of Need in that regard, which will trigger the formal process to determine which parts, if any, of the airspace change process in CAP1616 it will need to follow. This Statement of Need is independent of any requirement under FASI-S arrangements.
36. Even if no ACP is required by GAL to implement its proposed dual runway operations, it may qualify as a PPR. GAL should mention this possibility in its scoping document, as if it does qualify, then there will be a process to be followed in which the CAA is a decision-maker. As noted above, the CAA recently consulted on its proposed PPR decision-making process with the intention of having that process in place by 1 November 2019. That process includes a review of environmental impacts similar to that described in CAP 1616. Based on our current understanding of GAL’s proposals (which has been informed by meetings with GAL as well as the EIA Scoping Report), our preliminary view is that the proposed dual runway operations are unlikely to fall within the full PPR process.
37. Airports and ANSPs are expected to inform and engage overflowed communities about aircraft operational change and change to aircraft movements when such changes could have a noise impact on communities. The Air Navigation Guidance 2017 and direction 15 of the Airspace Directions given to the CAA requires us to produce guidance on transparency and engagement for such operational changes to airspace usage not covered by ACPs or PPRs. This guidance is described in detail from page 97 of CAP

1616. Although the CAA has no decision-making role concerning such changes, we would expect GAL to publish this information where it is relevant to its proposed dual runway operations.

38. Since there is a chance that GAL’s proposed dual runway operation will result in an ACP or PPR application, the CAA would recommend that the environmental metrics and analysis used in the EIA to be consistent with that required for ACP and/or PPR submissions. In respect of airspace change, CAP 1616 and CAP 1616a³ provide the relevant methodologies for use in environmental assessments to assist those preparing airspace change proposals. However, it appears to the CAA that those aspects of the EIA which are also part of the ACP process have been defined sufficiently closely that the data and methodologies are consistent, subject to the comments in this response.

Noise

39. The CAA has the following comments on the aspects of the EIA Scoping Report relating to the assessment of noise and emissions:

Para No.	Comment
2.2.9	Consider the following documents: <ul style="list-style-type: none"> - The Climate Change Act 2008 (2050 Target Amendment) Order 2019 - HMRC Technical note - Carbon Emissions Tax, 29 March 2019 - Net Zero - The UK's contribution to stopping global warming, Committee on Climate Change, May 2019
4.5.4	It would be beneficial to add ATMs and number of passengers should be given on a yearly basis for baseline year and forecast years
6.2.3	Terminology differs from established EIA practice, refers to major and substantial rather than significant. Not clear whether both major adverse and substantial adverse effects are classed as significant, or only the latter?
6.29	Assessment years do not mention or refer to year of maximum effect – only GHG emissions refers to a worst case scenario in para 7.8.29, but this needs also to be considered for noise and local air quality emissions – the year of maximum effect may be different for each
7.1.1	Consider the following document <ul style="list-style-type: none"> - The Climate Change Act 2008 (2050 Target Amendment) Order 2019
7.1.2	Consider the following documents <ul style="list-style-type: none"> - HMRC Technical note - Carbon Emissions Tax, 29 March 2019 - Net Zero - The UK's contribution to stopping global warming, Committee on Climate Change, May 2019
7.7.29	“The assessment will follow the guidance of the airport air quality manual (International Civil Aviation Authority, 2011)”. Replace ‘Authority’ with ‘Organisation’.
7.8.2	Consider the following documents <ul style="list-style-type: none"> - Department for Transport, Aviation Policy Framework, March 2013 (DfT, 2013) - Consultation response on UK airspace policy: a framework for balanced decisions on the design and use of airspace, 2017

³ CAP 1616a is the CAA publication ‘Airspace Design: Environmental requirements technical annex’

7.8.2	What time period is this data for? If it is to be assessed for day, evening and night, data should be provided for the three time periods, not 24h
7.8.3	Consider the following documents <ul style="list-style-type: none"> - Air Navigation Guidance 2017 (ANG), DfT, October 2017 - ICAO Annex 16 noise certification standards - ECAC/CEAC Document 29 4th Edition, 2016: Report on Standard Method of Computing. Noise Contours around Civil Airports.
7.8.7	'...using the same flight paths'. Since most southern runway SIDs are RNAV, but the northern runway SIDs are conventional, the dispersion of aircraft around the SID may be different for the two runways. See also comment on para 7.8.36
7.8.29	Mentions worst case year of maximum effect, but then defines assessment years as 2026, 2029 and 2038. Year of maximum effect must also be identified and assessed
7.8.31	Consider including noise contour areas, population counts and Noise Quota Counts in the assessment reports
7.8.36	Since GAL explicitly state they do not require an airspace change, we do not believe it is correct to state that 'within the turn, the flight paths will not be distinguishable'. The northern runway SIDs are conventional SIDs, whereas the current runway SIDs are RNAV, so there will be differences in flight track dispersion in the turns on both easterly and westerly operation. If GAL is separating this DCO proposal from future FASI(S) airspace changes, then the DCO assessment needs to reflect that the northern runway's conventional SIDs will likely result in flight path differences around the first turn, compared with the existing main runway RNAV SIDs.
7.8.39	What does the second bullet 'Type 2: Comparison against absolute noise level benchmarks' mean? Is this a future do-nothing scenario or something else?
7.8.57	Insufficient evidence presented to justify scoping out use of APUs from ground noise assessment. What are the 'operational reports' that 'demonstrate that it is rare for an aircraft to use the APU whilst on any of the stands as ground power is generally available'?
7.9	Consider covering Adaptation/climate change and GHG emissions separately for clarity
7.9.59	Consider adding the following information in the assessment: <ul style="list-style-type: none"> - GHG emissions from flights leaving UK, - Emissions covered by CORSIA, - Impact of CORSIA ending in 2035
7.9.60	Mentions that worst GHG emissions year will be identified, but not if it will be assessed and how, if do-nothing scenarios will be included only for 2026 and 2038
7.11	Consider including WebTAG, QALY or another health and wellbeing noise metric in the analysis.

CHARLWOOD PARISH COUNCIL

Serving the communities of Charlwood, Hookwood and Norwood Hill

www.charlwoodparishcouncil.gov.uk

e-mail: clerk@charlwoodparishcouncil.gov.uk

Application by Gatwick Airport Ltd (GAL) for Development Consent for the Northern Runway: Scoping Consultation.

The community of Charlwood Parish would be more affected by the proposed use of the Northern runway than any other community. In this response we start with comments on the local impact but also include some comments on general issues.

Local issues

Charlwood Parish includes the historic village of Charlwood with a fine Grade 1 Norman church and over 80 listed buildings, and the community of Hookwood lying to the north of the airport also potentially affected by the regular use of the Northern runway. Despite the fact that Gatwick Airport Ltd (GAL) share our parish boundary on the whole northern side, Charlwood remains essentially a rural community surrounded by fields and woods with a thriving community.

Representatives of the Parish Council, as one of three local councils with boundaries abutting the airport, attended a GAL / Technical Officer Group meeting at Gatwick on 3 September to discuss the proposed Environmental Impact Assessment, and we wish to make the following comments.

The published Master Plan plans produced by GAL show the airport extending outside the existing airport boundary by including a field adjacent to the Aviation Museum in our Parish. The present airport boundary was established in 1973 and since then we have had the reassurance that there has been no question of moving it along the northern boundary. This new extension not only brings the airport into our parish, it also brings it into Mole Valley District Council, into Surrey, and into the Green Belt.

We are concerned that the plans produced by GAL give virtually no details about the proposed uses of the land at the north-west end of the development, including the field in our parish. It is difficult to comment on an environmental impact assessment without knowing what type of development is proposed.

We are told that it is proposed to construct a new around-end taxiway and new holding areas. But it is difficult to make proper assessment without knowing the extent of these developments and whether it is proposed to construct new earth bunds, such as have been constructed around all the northern side of the airport, in order to shield our communities from noise and visual intrusion.

GAL presented plans at the GAL Scoping meeting which indicate in addition, a large area on the north west of the new development marked as a potential mitigation area outside the current airport boundary. This area happens to coincide with the fields which are at present part of Brook Farm. It would bring the boundary of the airport virtually up to the edge of Charlwood village. We are, of course, in favour of suitable mitigation but before we can sensibly comment on the scope of the environmental impact assessment, we need details of what mitigation is proposed on this land. It would make a big difference to the Assessment if this area were to be planted with trees and the site of new earth bunds. We have grave concerns that there would be a huge temptation for the airport at some stage in the future to use this land for car parking or other ancillary use. We will be requesting a legal agreement that this land is not to be included in operational airport land, or used for car parking or any other airport associated use at any time in the future.

We are very concerned that regular use of the Northern runway will mean more noise for the communities of Charlwood and Hookwood. For many years we have been promised that quieter aircraft will reduce the noise we suffer. We will be very disappointed if the Assessment merely concludes that the noise will be no worse than at present. It has been Government policy that the benefits of quieter aircraft should be shared between the aviation industry and local communities.

Regular use of the Northern runway would especially mean extra noise, both air noise and ground noise, especially for houses in Ifield Road and Russ Hill. Local

residents already complain when the Northern runway is used. The holding areas and the new round-the-end taxiway will be used by large aircraft and will obviously seriously increase ground noise for local residents and this needs to be included in the assessment. We ask that a site at the southern end of Ifield Road to be included in the specific locations to be assessed, in addition to Charlwood Primary (not Infant) School.

We are also concerned that there will be a temptation for air traffic controllers on some occasions, or for go-arounds, to instruct aircraft after take-off to turn sharp right over Charlwood - currently they are not permitted to do so. We will be seeking a legal agreement to prevent this.

The forecast 34% increase in traffic and freight will mean more cars, white vans and more HGVs. An increasing proportion of Gatwick road traffic passes through Charlwood as result of Satnavs or smart phones indicating that this is the shortest route to and from the north west. We also suffer an increase in traffic when Satnavs automatically divert traffic when the M23 or M25 are blocked, or when there is a traffic jam on the A217 through Reigate. This could get much worse. The Assessment should include an impact of increased traffic on our villages of Hookwood and Charlwood.

At the consultation stage CPC will be requesting various mitigation measures - a legal agreement to prohibit flying over Charlwood; that no spoil suitable for bunding should be removed from the airport; the construction of large earth bund/bunds around north-west corner of the airport; tougher controls on the Povey Cross barrier designed to prevent our villages becoming rat-runs; no use of the grass runway at the Aviation Museum; and (as mentioned above) legal restrictions of use of Brook Farm land. We understand, however, that the Impact Assessment has to be done without taking mitigation measures into account.

General issues

There has not been a thorough planning scrutiny process and settlement in relation to Gatwick airport since the agreement between West Sussex County Council and British Airports Authority was entered into in August 1979.

Since then Gatwick has grown from under 9 MPPA and 115,000 air traffic movements (ATMs) to 45.7 MPPA and 280,790 ATMs in 2017/18.

This growth has had benefits in terms of local employment and the choices available to those wishing to travel. But it has also had profound impacts on local communities and infrastructure, on communities under flight paths and on the local environment. And it has facilitated substantial growth in aviation's greenhouse gas emissions, making a significant contribution to climate change.

Gatwick's Scoping Report is concerned solely with the airport's 'emergency' runway project. It takes the view that the growth proposed to be achieved by making more intensive use of the airport's main runway, from 45.7 MPPA in 2017/18 to 61 MPPA in 2032/33, does not need to be addressed in its EIA and ES because, in Gatwick's view, this project does not require a Development Consent Order (DCO).

We do not believe this is a credible or sustainable position for Gatwick to take, or that it is consistent with government policy. We make the following observations in relation to it:

1. Alterations to airports in England fall under the Planning Act 2008 (and therefore require a Development Consent Order (DCO)) where the alteration would increase by at least 10 million per year the number of passengers for whom the airport is capable of providing air passenger transport services
2. Gatwick's plans for the intensification of usage of its main runway would increase the number of passengers by substantially over 10 MPPA
3. GAL appears to believe that its main runway growth plans do not require a DCO because the works comprised in that project do not constitute an "Alteration" for the purposes of the Planning Act
4. GAL's Master Plan does not provide any information on the planning or other permissions or processes that its main runway growth plans will be subject to. Its intention appears to be to obtain any required permissions on a piecemeal basis without their collective impacts at any stage being subject to an over-arching planning or other accountable public process.

5. This would result in the perverse position where the smaller aspect of Gatwick's growth plans - regular use of its emergency runway - would be subject to thorough scrutiny and assessment through a DCO process but the larger aspect - more intensive use of its main runway - would not be scrutinised or assessed.

6. It would also mean that the DCO assessment of Gatwick's proposals to make routine use of its emergency runway would be distorted because they would use baselines that assume main runway growth had already taken place.

We do not believe it is right for the airport to be able to implement its very significant main runway growth plans by clever manipulation of the planning regulations and without thorough assessment and scrutiny of their full impacts, including full public consultation.

We note that the government's policy on airports making best use of existing runways says "Applications to increase caps by 10mppa or more or deemed nationally significant would be considered as Nationally Significant Infrastructure Projects (NSIPs) under the Planning Act 2008 and as such would be considered on a case by case basis by the Secretary of State."

We therefore urge you to consider rejecting the limited scope proposed in Gatwick's Scoping Report and instead to insist that the full extent of growth proposed in Gatwick's Master Plan, both on the emergency and main runways, is subject to proper scrutiny and assessment.

Alternatives

PINS Advice Note 7 requires Scoping Reports to include "an outline of the reasonable alternatives considered and the reasons for selecting the preferred option". In our view Section 3.2 of the Scoping Report does not adequately assess alternatives to the project Gatwick is proposing.

The Scoping Report does no more than restate the development options set out in Gatwick's Master Plan. It does not consider the benefits and costs of do-nothing options. It does not consider the potential option of limiting demand for Gatwick's services so as to achieve over-riding environmental objectives. And it does not

consider the option of meeting any additional sustainable demand by sharing growth more equitably across all of the UK's airports.

In this context we note particularly the letter from the Chair of the Committee on Climate Change to the Secretary of State dated 12 February 2019 in which the Chair states "Achieving aviation emissions at or below 2005 levels in 2050 ... will also require steps to limit growth in demand. In the absence of true zero-carbon aircraft, demand cannot continue to grow unfettered over the long-term."

Gatwick's Scoping Report appears to assume that demand will grow unfettered over the long term and fails to consider any alternative in which that is not the case.

Noise

We suggest that the study uses the WHO (Europe) aircraft noise limit guidelines and therefore addresses comprehensively all areas impacted by noise down to 45 dB Lden. in the day, since aircraft noise above this level is associated with adverse health effects, and 40 dB Lnight for the night period, since night-time aircraft noise above this level is associated with adverse effects on sleep.

The Scoping Report also says in paragraph 7.8.33 that "Leq 16 hour day and 8 hour night will be used as the primary metrics to quantify impacts in terms of the areas and population within the various 3 dB noise contour bands in the ranges above." It proposes that noise event frequency metrics should be secondary metrics only and it seeks to give the impression in paragraph 7.8.20 that this has been agreed with the Noise Management Board. That is not the case.

In our view noise event frequency is as important to many people as average noise levels. We therefore believe frequency metrics should be primary metrics and accorded the same weight as Leq metrics.

Proposed scope of assessment: impact on property prices

The Scoping Report proposes in paragraph 7.10.24 that the effect of the Project on property values should be scoped out because "It is not considered that there are likely to be direct impacts on residential or commercial properties outside the

Project site boundary and there would be no change in flight paths and therefore the potential for effects to arise is limited.”

We do not agree. We believe that the increase in flight numbers that would arise as a result of the project and their concentration in areas that already suffer aircraft noise would be very likely to cause reductions in the value of homes and other assets. All potential value impacts should be fully quantified and, should the project proceed, fully compensated for.

Proposed scope of assessment: health impacts

The Scoping Report says in paragraph 7.11.18 that health “data collection will focus on the local authority districts of Crawley and Reigate & Banstead, with data for areas within the surrounding counties of West Sussex and Surrey (where appropriate) ...”. Charlwood Parish is in neither Crawley nor Reigate and Banstead.

It also says, in paragraphs 7.11.28 and 7.11.34, that *“Where possible, the health assessment will quantitatively assess changes in noise exposure for a range of potential health outcomes, including annoyance, hypertension, sleep disturbance and academic performance in schools”* and *“The assessment approach will be quantitative where the evidence base allows, and the relative change is sufficient. With regard to the more subjective and intangible aspects of health and features important to wellbeing, a qualitative approach supported by an appropriate evidence base will be applied.”*

In our view these proposals are insufficiently clear and might not result in the thorough health impact assessment that is required. We believe there must be a specific, quantified, assessment of the health impacts on people under flight paths who would suffer the effects of significant increases in aircraft numbers. We also believe there needs to be a thorough assessment of the health effects of expansion on air quality taking account the additional traffic forecast to be generated.

Misrepresentations

In our view the scoping report contains a number of statements that misrepresent government policy, as set out below.

3.1.6 “Within these objectives, the framework sets out that a key priority in the short term is to make the best use of existing capacity of UK airports.”

3.2.8 “Scenario 2 proposes that a strip of additional pavement is laid to the northern edge of the existing northern runway, so as to allow the corresponding adjustment of its centreline north of its current position. This would allow the dual operation of the main runway and northern runway together to achieve higher throughput overall. This is in accordance with Government policy of making best use of existing runways.”

Neither of these are accurate statements of government policy, it is GAL’s intention to relocate the existing ‘emergency’ runway 12m. north, it is therefore important that the government’s full policy position is taken into account.

Yours

Penny Shoubridge

Chair - Charlwood Parish Council

30/9/19

ECONOMY AND PLANNING SERVICES



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Our Ref: CR/2019/3004/EIA
Email: development.control@crawley.gov.uk
Date: 30 September 2019

Gatwick Airport Ltd
c/o Mr Richard Kent
Major Casework Directorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

Dear Sir

PINS REFERENCE : TR020005-000008

PROPOSAL: RESPONSE TO CONSULTATION FROM THE PLANNING INSPECTORATE UNDER REGULATION 10 OF THE INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 FOR COMMENTS ON THE SCOPING REPORT.

APPLICATION BY GATWICK AIRPORT LIMITED FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE GATWICK AIRPORT NORTHERN RUNWAY.

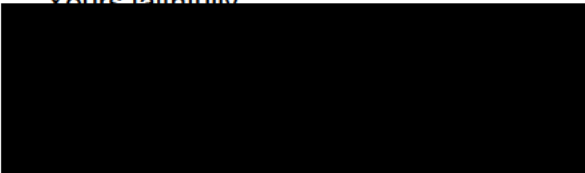
I write with reference to your letter dated 3rd September 2019 seeking the views of Crawley Borough Council (CBC) on the information to be included in the Environmental Statement (ES) that will be submitted by Gatwick Airport Limited as part of the application for a Development Consent Order (DCO) for the northern runway. CBC is a 'host authority' in relation to this development with the majority of the land falling within its administrative boundary.

The Borough Council has reviewed the information submitted in the Environmental Impact Assessment Scoping Report (EIASR) dated September 2019 and has a number of comments and recommendations to make in respect of the proposed scope of the proposed Environment Statement (ES) to be prepared to accompany the Project.

The Borough Council has focussed its detailed comments on those topics which impact most directly on the Borough (with the exception of noise which cover impacts on the wider area) and on its areas of regulatory responsibility in respect of planning and environmental health with more general observations have been made on other areas such as transport where the technical expertise rests with other authorities such as West Sussex County Council.

The attached response is structured under the Headings used in the EIA Scoping Report.

Yours faithfully,


Clem Smith
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Part 1 - Introduction

- 1.1 The overarching concern of CBC is that there is lack of clarity on the extent of the works that would be subject to the DCO and EIA process. This ambiguity impacts upon the elements of the EIASR provided by GAL and affects the ability of CBC to respond robustly to the Scoping Report.
- 1.2 Part 1 of the EIASR references a Project boundary shown on figures 1.2.1 and 1.3.1 which appears tightly drawn around the airport itself and seemingly fails to identify other areas of land that may be required elsewhere for environmental mitigation or infrastructure improvements. CBC is therefore concerned that the Project boundary is too tightly drawn for the purpose of the ES.
- 1.3 CBC has other key concerns with the approach taken in the EIASR in respect to the baseline assumptions made about airport capacity and expansion which in turn underpin the assumptions in the DCO project. For example, para 1.3.3 states that the maximum potential capacity of the airport could increase to 61mppa by 2038 based on existing facilities but then outlines in Section 4 of the report that some new facilities would be required to support this assumed increased passenger number, but not when they would need to be delivered. Further points on this aspect are set out under part 4.
- 1.4 Nowhere in the EIASR is there a clear project description of the DCO works, CBC are therefore concerned about the lack of clarity on what precisely comprises the proposed development. It is considered that there also needs to be a much clearer understanding of the phasing and infrastructure needed as the airport expands, as the report appears to contradict itself concerning operational timings, development requirements and car parking provision. These points are expanded under part 5.
- 1.5 In para 1.3.1 the 'northern runway' is also referenced as the 'standby runway'. For the avoidance of any doubt this runway is currently known as the "Emergency Runway" under condition 3 of the relevant planning permission CR/129/1979 (not reference in the EIASR) and in the 1979 legal agreement which is referenced. It would be beneficial if the ES used the same reference in its report to avoid any confusion. It should also be noted that while reference to the restriction on the emergency runway in the legal agreement may have expired in August 2019, the planning condition still remains in force and would need to be varied through the DCO process. In the absence of the lifting of this planning condition, the runway can still only be used as an 'emergency runway'.

Part 2 – Consenting Process

- 2.1 In respect of Local Policy, Table 2.2.1 should have the Crawley 2035 (Draft Crawley Borough Local Plan) in the emerging policy box for Crawley Borough Council, not West Sussex County Council.
- 2.2 CBC welcomes engagement from GAL with the ten local authorities in the Gatwick Diamond, and recognition of the need for support from GAL for ongoing engagement throughout the DCO process. A joint Planning Performance Agreement is being discussed.
- 2.3 In respect of diagram 2.3.1 CBC consider it would be beneficial if the Government agencies such as the Environment Agency, Natural England, Highways England and Network Rail were directly involved with the local authorities and attended the Topic Working Groups and

Coordination Group when appropriate in order that all the local authorities can benefit from their expertise and advice and in order that all parties are informed of the issues raised.

Part 3 – Need and Alternatives Considered

- 3.1 Notwithstanding the case put forward by GAL in the EIASR it is considered that further assessment should be undertaken to justify the need for the significant increase in capacity at Gatwick through the Project. This is considered necessary particularly in the light of the Government's commitment to achieving an emissions' reduction target of 100% by 2050, (as set out in the Climate Change Act 2008 (2050 Target Amendment) Order 2019), and information in the Heathrow Expansion Consultation Document, June 2019, that Heathrow R3 will not be at full capacity until 2050.

Part 4 – Existing Site and Operation

- 4.1 This section of the EIASR is intended to provide an overview of the existing airport, its operations and the key changes that are proposed in the current do minimum scenario (para 4.1.1)
- 4.2 CBC is unclear what the Gatwick Airport boundary drawn in figure 4.2.1 is based upon and this requires some qualification as it does not match with the airport policy boundary set out in the Crawley Borough Local Plan Policy GAT1, nor with airport operational land, nor with the boundary plan contained within the current Gatwick 106 Agreement.
- 4.3 With regard to the existing situation at Gatwick set out in the chapter, CBC consider that the description of the existing site and operations requires further clarification. This information must be verified if it is to be used in any baseline assumptions for the ES. For example, it is not clear if the office floorspace figures includes space that is currently used by non-airport users on a temporary basis (which would become available for airport related use during the DCO period) nor whether the cargo sheds are all used by on-airport activities. It is also not clear when some of the proposed /consented projects set out in section 4.3 are to come forward. This could be after the Project start date, as the report sets out that the maximum capacity on a single runway is not reached until 2038. It is also not understood what capacity would be reached on the existing runway at the start date of the Project in 2026. Without accurate data in the baseline it is impossible to understand the airport's needs going forward or gauge any understanding of the assumptions and modelling that inform the ES/DCO. Similarly, further evidence will need to be provided as baseline information in order to verify the assumptions made about car parking capacity, hotel rooms and predicted changes in passenger numbers and cargo transport / throughput.
- 4.4 Within part 4 of the report there are many assumptions about the completion or implementation of projects by others, such as the smart motorway or the station improvements. Some other projects are known to be in the pipeline however, others listed such as the BLOC hotel extension have not been subject to any formal consultation or planning permission. Other assumptions include an increase in the provision of parking spaces through robotic car parking the success of which is unknown as it was only trialled for a limited period this summer (CBC reference -CR/2018/0935/CON). The list of projects also appears to be incomplete as it does not include all proposals such as the Rapid Exit Taxiway which is expected to improve the operational efficiency of the main runway and was the subject of a Part 8 of the GPDO consultation this summer (CBC reference - CR/2019/0448/CON). It is therefore recommended

that GAL work with CBC and others in order to establish and agree an accurate baseline on which to progress the ES forward.

- 4.5 In summary, CBC request further evidence in the ES to underpin the key parameters set out in the EIASR in Table 4.6.1 of the report to ensure these have been fully demonstrated as, at this point in time these are not considered a sound basis on which to prepare the EIA.

Part 5 – Project Description

- 5.1 As previously stated, the extent of the project is unclear. While some aspects of the development seem well defined and are clearly represented on figure 5.2.1a, other elements seem vague with a lack of quantum or even a definitive location. A comprehensive plan is needed showing all elements of the proposal together and for greater clarity on where all development elements will be sited in order to assess the impacts.
- 5.2 It would appear that some parts of the site have alternative options or multiple uses. For example, at South Terminal the office site is stated as also being the location for a hotel and a multi-storey car park, while at North Terminal, the hotel site is also identified as a construction compound, multi-storey car park and a location for underground water storage. Other elements of the Project which may have significant impacts have alternative locations shown, for example, one of the potential locations for the water treatment works is south of the current sewage treatment works which would be close to existing residents in Radford Road. The potential impact of which is not identified at all in the chapter on air quality. There is also uncertainty about the rationale for the delivery timing of certain elements of the Project. For example, surface water drainage measures appear to be phased last in the project (table 5.3.1) so CBC would wish to ensure that environmental impacts such as flood risk are not increased at any point during the implementation period. Without any clarity on the extent of the infrastructure proposed and their respective locations, it is impossible to assess the environmental impact or the adequacy of the methodology for measuring impacts. In the absence of a clear layout, there is therefore a real risk that important potential environmental impacts will be missed.
- 5.3 The description of many of the infrastructure works are considered to be too vague for example, the new piers and stands described give no indication of capacity. New cargo facilities, airfield surface transport facilities and a satellite fire station are not identified on any plan. Boundary treatments including noise walls and bunding are not clear and such structures and their associated uses have potential to impact sensitive receptors to a much greater degree given their proximity closer to the airport boundary in terms of noise and visual impact. How can the ES adequately scope the impacts of these when their location and scale is yet to be defined? There is a risk that the detailed elements of the DCO project would change considerably prior to the application which could result in another scoping exercise being necessary.
- 5.4 The proposed development has significant engineering operations that are just being simply described such as works to forecourts (para 5.2.41), surface water drainage (para 5.2.55) and additional car parking (para 5.4.42/43) described as decked car parking up to a height of 27m. The exact locations of these car parks and how many are to be decked is unclear but the net increase is very significant at 17,500 spaces.
- 5.5 There is also concern about the level of uncertainty around proposed surface access improvements as set out in para 5.2.44. It would appear that a road traffic assessment has not been undertaken and there is an acknowledgement that potential solutions may need to be designed. The extent of the EIASR scoping boundary is very limited which falsely implies that

there would be limited impacts outside of the airport development area. The impacts on surface access must therefore be extended from the limited boundaries drawn by the EIASR.

- 5.6 CBC question the assumption in para 5.2.45 that the increase in traffic volumes is likely to be greatest at the South and North Terminal junctions which appear to necessitate the scoping option of an 8m tall flyover at both junctions. Both these junctions are fed from the M23 Junction 9 spur which is not identified as being impacted and it not even wholly with the Project scoping boundary (see figure 5.2.1d). The impacts on this junction as a minimum must be fully scoped in. CBC is also concerned that the only other road capacity issue identified is at the Longbridge Roundabout (para 5.2.50) and there is little consideration of the impacts upon the wider road network. With the transport modelling not finalised the scope of impact on the highway network cannot be defined and the report is therefore incomplete.
- 5.7 Increased impacts will be experienced on Crawley's local roads such as the A2011/A2004 Hazelwick Roundabout which is an AQMA, and routes such as the A23 to the airport which will experience increased traffic from new employees and passengers. Until initial highway modelling has been undertaken, following consultation with all local authorities, an accurate scope of impact on the highway network, and additional mitigation which may be required as part of the Project cannot be established.
- 5.8 In respect to the rail network the report para 5.2.52 assumes that no further rail improvements are required. It is considered that this assumption is incorrect as the report also states that "*studies will be undertaken to explore the need for further improvement to the rail station*". In addition, assessment should be made of the capacity of the rail network itself. The option to further improve rail capacity and encourage this sustainable form of travel must be included as part of the ES.
- 5.9 There is no reference at all in part 5 of the EIASR to improvements to bus services and facilities or other sustainable travel modes such as cycles. This is a major omission that must be included as an integral part of the project and part of the ES.
- 5.10 CBC considers there should be further clarity and understanding on the phasing and detail of the project and questions the key parameters set out in Table 5.4.1 that are proposed to inform the ES. This ties back to the lack of a comprehensive plan showing the likely land uses and the seemingly multiple uses of some sites.

Part 6 - Approach to EIA

ES Assessment years

- 6.1 The ES assessment years chosen are not explicit in the EIASR although the years under consideration seem to be 2026 (runway opening), 2029 (interim design year) and 2038 (all elements). The timing and delivery of Heathrow is identified as a key variable which will influence the growth of and environmental impacts at Gatwick (para 6.2.10 and 6.2.11).
- 6.2 The implications for Gatwick in relation to the timings at Heathrow were discussed with the Local Authorities in much greater depth than is presented in the EIASR at the topic working group meetings held in the week prior to the submission of the scoping report to PINS. It was clear that any delay to Heathrow would have very significant impacts as passenger growth at Gatwick will grow much faster prior to Heathrow becoming operational and then slow once Heathrow R3 opens. The Report states that the ES will assess a later opening date for Heathrow, but does not set out when this date would be. This could change the impacts arising from the project. .

- 6.3 CBC is also concerned that in a scenario where the Heathrow third runway is delayed beyond the 2038 date when maximum capacity is envisaged with the Project, or is not built at all, that Gatwick's growth would be likely to take place at a much faster rate and has potential to reach capacity before 2038. CBC requests that this scenario should be modelled as a Worst Case scenario for the ES.

Project parameters

- 6.4 Paragraph 6.2.34 suggests that later elements of the construction project will be operated by third parties. CBC questions whether the inclusion of facilities such as three hotels and construction of new office blocks (particularly as it is not clear whether the end occupier could be a non-airport related user) is directly linked and required to facilitate the airport expansion. CBC consider these uses are functionally separate and are not necessarily essential on-airport to cater for the increase in passenger numbers resulting from the alteration of the runway and these elements should be deleted from the project.
- 6.5 Furthermore, the justification for the inclusion of these elements is also not evidenced within the EIASR when considered alongside the key parameters listed in section 4 of the report. For example, in table 4.6.1 which states the Scenario 1 parameters, with a passenger throughput of 61mppa (an increase of 15mppa on 2018) the airport would have 3,250 hotel rooms (an increase of 250 on current numbers) and 31,770 sq m of office space (no increase). However, for the further increase to 74mppa (an additional 13mppa) the project Scenario 2 assumes a requirement of 3 hotels (800 plus bedrooms) and 8,920 sq m of office space. CBC consider that this increase in provision does not appear to correlate logically with the further increase in passenger numbers over the Scenario 1 position. This further suggests that these elements are functionally separate and should be deleted from the project.

Part 7 - Proposed Scope of the Assessment

7.1 Historic Environment (Section 7.1)

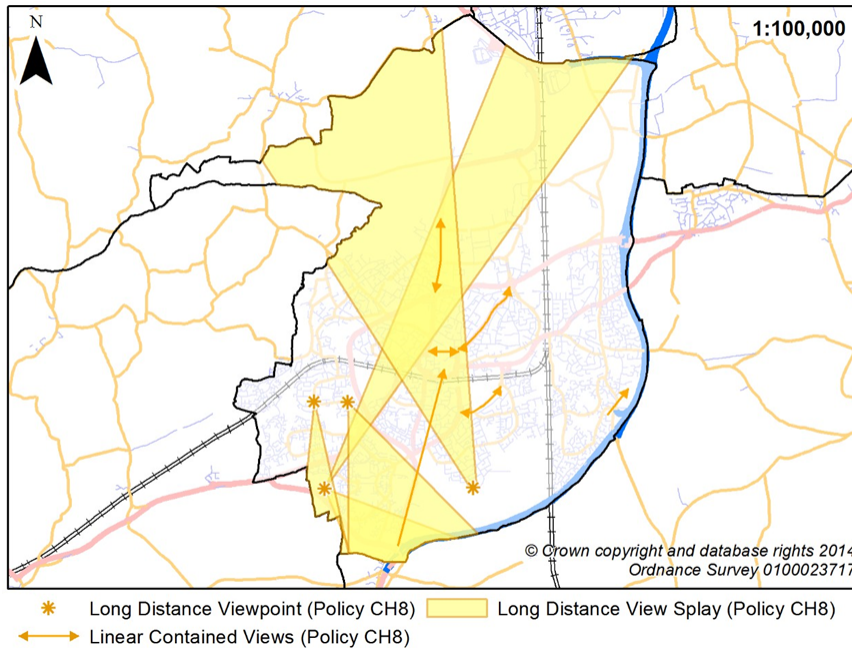
- 7.1.1 The physical impacts on historic listed and locally listed buildings of any potential noise mitigation (eg additional glazing, insulation or mechanical ventilation) that could be required in noise affected locations should be scoped in and considered as part of the ES. Section 7.8 in the EIASR makes clear that noise mitigation is likely to include noise insulation as a main mitigation measure (para 7.8.49)
- 7.1.2 It is unclear what para 7.1.39 considers as "the more urbanised areas of Horley and Crawley" in respect of the impact on settings and what is assumed to be scoped out. CBC would like more certainty on the scope of the assessment and would recommend that the assets are listed within the ES in order to ensure that no important assets are excluded.

7.2 Landscape, Townscape and Visual Resources (Section 7.2)

- 7.2.1 In paragraph 7.2.1, the relevant legislation to be considered should also include the following:
- Crawley Landscape Character Assessment (2012) CBC
 - A Strategy for the West Sussex Landscape (2005) WSCC
 - West Sussex Landscape Character Assessment (Land Management Guidelines (2003)
- 7.2.2 In paragraph 7.2.4, there is a reference to inclusion of "main buildings" referred to as part of the ZTV model. It is not clear whether the CARE centre with its 50 m tall chimney, the hotels (as

these are functionally separate from the airfield) and the grade separated junctions are included as part of this model, CBC would wish to ensure that all elements of the Project are included.

7.2.3 CBC consider that the ZTV identified in paragraph 7.2.4 is not extensive enough to capture the key views of the airport from within the Borough Boundary as identified in policy CH8 of the adopted Crawley Borough Local Plan. The study area should be extended to capture the long distance views identified in the policy from Tilgate Park, Junction 11 with A23/A264 and Target Hill.



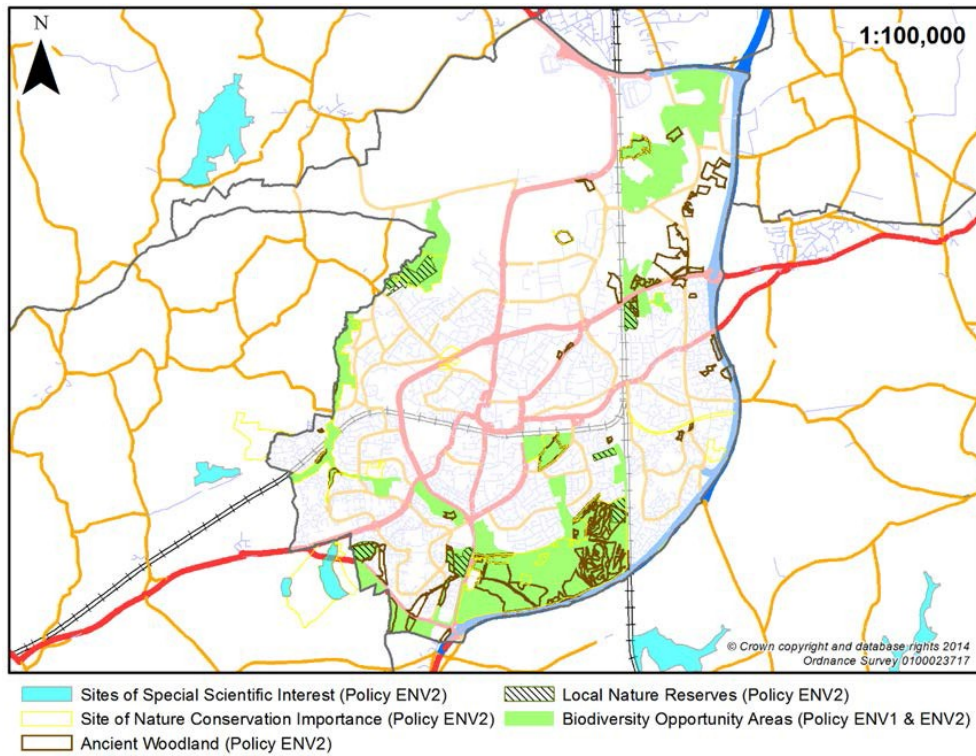
7.2.4 There are also views to the airport from land in the High Weald AONB to the south of the Borough and it is considered that the study area should extend to include views on the higher land to the south as identified in the topographical map figure 7.2.17. In paragraph 7.2.32, it is proposed that all landscapes and townscapes outside of the ZTV will be scoped out of the assessment. However, for the reasons set out above CBC consider that the area is not extensive enough to capture all key views and the ZTV should be extended.

7.2.5 As referenced in paragraph 7.2.16, CBC welcome the opportunity to add to selected viewpoints during the assessment process. The view from Bonnets Lane northwards towards the airport and views west of Ifield (including the edge of the Conservation Area) should be added, particularly if new car parks are proposed south of the main runway.

7.3 **Ecology and Nature Conservation (Section 7.3)**

7.3.1 The Sussex Biodiversity record centre records should be drawn upon and should inform the existing baseline conditions in addition to the information collected so far referred to in 7.3.5.

7.3.2 Within the section on 'existing baseline conditions' the EIASR fails to mention the locally designated Biodiversity Opportunity Areas which extend up to and within the airport boundary (see Crawley Borough Local Plan policy ENV2 attached map), these areas must also be carefully considered and impacts assessed as part of the ES. There are also pockets of ancient woodland just beyond the airport boundary, such as Huntsgreen Wood at the Gatwick Rd /A23 junction, and Allen's Wood /Blackcorner Wood to the SE of the airport boundary should be included in the scope



- 7.3.3 In respect of the potential effects in table 7.3.1, the ES should be clear on the clear synergies between drainage and ecology impacts upstream or downstream from the airport as any increase in water flow through a watercourse could impact on the ecology of the watercourse or floodplain (including any increased sediment loading or contaminants). This should be assessed and mitigation methods identified.
- 7.3.4 The mitigation list 7.3.43 makes no reference to the enhancement of biodiversity which should be included as a requirement of the Project, to be consistent with the Government position set out in its 25 year Environment Plan (2018) (and reflected in the Crawley Borough Local Plan Policy ENV2) to halt the loss of biodiversity by 2020 and move to net gain.
- 7.3.5 CBC confirms that Willoughby Fields referenced in 7.3.12 is a designated Local Nature Reserve.

7.4 **Geology and Ground Conditions (Section 7.4)**

- 7.4.1 Para 7.4.1 CBC welcomes the opportunity to be involved in the scoping of the Phase 1 Preliminary Risk Assessment.
- 7.4.2 In Table 7.4.2 construction phase effects should include any risks to public from the removal of any potential contaminants from the site

7.5 **Water Environment (Section 7.5)**

- 7.5.1 Paras 7.5.17 /18 in the EIASR suggest that there is existing under capacity in pollution storage lagoons and the pumping system, resulting in untreated polluted water entering the River Mole during heavy rain. This is a key issue for assessment and mitigation, especially with predicted higher intensity rainfall due to climate change.

- 7.5.2 While reference is made to climate change (para 7.5.20), CBC would welcome engagement with GAL to agree appropriate modelling scenarios to address this important issue. Furthermore, any hydraulic model developed should include an assessment of changes in topography and overland flow of any future development planned or that may arise as a result of this development.
- 7.5.3 In para 7.5.25, there appears to be an error in the water quality baseline data as the 2017 target has been passed.
- 7.5.4 CBC questions if the drainage patterns described in para 7.5.45 are correct as geographically they appear to be the wrong way around (South Terminal is closest to Crawley ST Works).
- 7.5.5 Para 7.5.53 states that a surface water drainage strategy will be developed for the Project. Any such strategy should be based on sustainable principles (SuDS) except where it can be proven that this cannot be achieved because of airport safety considerations. Any proposals for surface water management should consider the water discharge hierarchy. Consideration must give to the requirements of the WSCC surface water drainage policy and will require a close to greenfield run-off rate to be considered in the surface water management strategy, and in a worst case scenario at least a 50% betterment. Land raising within the proposed development area will not be acceptable unless compensatory storage is proposed.
- 7.5.6 CBC would also wish to ensure that any drainage strategy for the Project can demonstrate through the ES that there is no likelihood of increased flooding occurring upstream (south) of Gatwick. The ES should consider these impacts due to the risk to homes and properties, the ecological sensitivity of the watercourses to the south including Ifield Meadows (unimproved grassland SNCI and Ancient Woodland) and Willoughby Fields (LNR) and the cumulative impact on the wider land area which is under pressure for development.
- 7.5.7 In Table 7.5.6 CBC consider that it is essential to understand how pluvial and fluvial flows will be managed during the construction phase of the development, this needs to be fully assessed and mitigation methods highlighted in the ES. The EIASR suggests that drainage compensation measures are phased late in the development process. CBC would wish to ensure that there no increase in flood risk on the site or to surrounding areas at any stage during construction works.
- 7.5.8 The ES should highlight and needs to carefully consider the environmental impacts of increased flows on watercourses especially the increase in sediment loading to surface water and water quality /pollutants as a result in of the significant increase in impermeable area. The impact on ecology from increased or disrupted water flows should also be considered.
- 7.5.9 CBC consider that due to the proposed significant increase in impermeable area, and the increase in aircraft and ground vehicle operation when the runway is brought into operation, there could be an increase in sediment loading and pollutant deposition due to increase in aircraft and ground vehicle operation when the run way is brought into operation. This should be assessed in the ES.
- 7.5.10 The approach taken to water supply in respect of mitigation, enhancement and monitoring para 7.5.87 is not considered robust. Gatwick is in an area of high water stress and this development would have a high water demand. The cumulative effects on the area's water supply from this and other projects and the development in the area should be considered in the ES along with active mitigation measures to reduce consumption and recycle greywater.

7.6 **Traffic and Transport (Section 7.6)**

- 7.6.1 The detailed comments from West Sussex County Council as the local highway authority are endorsed by CBC. In addition CBC wishes to make a few specific comments on local traffic and transport matters.
- 7.6.2 Paragraph 7.6.12 asserts that improvements to train capacity provides “*sufficient overall capacity for Gatwick to continue to grow its rail mode share over the next decade*”. For the ES, full assessment of the capacity of the rail network to accommodate growth in passengers and staff, as well as increasing rail mode share for access to the airport, should be undertaken. This should include the Arun Valley line as well as the Brighton Mainline, and Southern and GWR services as well as Thameslink and the Gatwick Express. Cumulative impacts of planned and anticipated growth in the area should also be taken into account in determining the need for enhancements to capacity, further information is provided in 7.15 below. .
- 7.6.3 The area of detailed modelling for highways, shown in Figure 7.6.1, excludes significant centres of population yet paragraph 7.10.5 describes a wide area for the Labour Market assessments. Para 7.10.24 asserts that “*Future labour demand will be distributed across a wide labour catchment area so no significant impacts on population levels or housing and community infrastructure needs are expected*”. CBC consider that surface transport modelling for all modes must include this full area, including the major urban areas along the south coast, Tunbridge Wells and Guildford, and detailed assessment of the impact on in-commuting needs to take place.
- 7.6.4 Effects to be assessed in the ES, as set out in para 7.6.47, should take account of any cumulative impacts should there be cross over between the Gatwick Station works and early works on the Project.
- 7.6.5 The Transport Assessment which, as stated in para 7.6.61 will include Gatwick’s Surface Assess Strategy, should prioritise sustainable access to the airport and include challenging modal shift targets which will then inform the identification of transport mitigations which may not be highway schemes. It should include a Car Parking strategy as a key part of the mode share target, with the aim of reducing the amount of access to the airport by private car.
- 7.6.6 The reference in paragraph 7.6.63 to “*Reviewing the extent to which the Sustainable Transport Fund....provides benefits.....*” is welcomed but should also consider other possible options and measures to significantly improve public and active transport modes, using the profitability of on-airport parking to help provide funding.
- 7.6.7 The ES should fully assess the impact of increased greenhouse gas emissions from increased road traffic accessing the airport, and its effect on achieving the Government’s “Net Zero” commitment, (Climate Change Act 2008 (2050 Target Amendment) Order 2019).

7.7 **Air Quality (Section 7.7)**

- 7.7.1 The requirements of the National Emission Ceilings Regulations (NEC) Regulations should be considered (para 7.7.1). These requirements should be reported within the ES to demonstrate that the development will not affect CBC’s ability to comply with its legal obligations during both the construction and operational phases of the proposed development.

7.7.2 Para 7.7.27 states that the study area for emissions from construction traffic will be based on the routes assessed within the ADMS-Roads dispersion model. Due to the size and duration of the construction phase, as well as uncertainty of future baseline projections, CBC would expect the ES assessment process to follow a conservative approach and precautionary study area. This is particularly relevant in areas within or adjacent to AQMAs, or where temporary traffic management schemes will displace traffic onto roads where concentrations are approaching the air quality objectives and where small deteriorations may have significant impact.

Study Area/Baseline Information – Operational Phase

7.7.3 Future Growth Uncertainties - The study area for the operational phase focuses on the affected road network based on changes to road traffic during operation. Although current committed and planned development would be included in the traffic growth figures, the uncertainty about the scale and location of future growth in the wider area and associated with the proposed development means that traffic forecasts may considerably underestimate the changes and consequently the modelled air quality impacts. The Project would result in 3,000 on-airport jobs and many more indirectly employed and these commuters are considered to have a disproportionate effect on the local transport network. CBC would therefore expect to see a precautionary approach with a range of potential future growth scenarios reflecting traffic volumes that are consistent with future economic and housing growth. This is important to check that the cost-benefit evaluation of the Project is not skewed in favour of economic growth at the expense of environmental impacts.

Hazelwick Air Quality Management Area (AQMA)

7.7.4 This is acknowledged in para 7.7.9 of the EIASR. The roads in and around the AQMA provide the main routes into the Manor Royal Business District and commuter routes into Gatwick for local airport staff. Many of the businesses on Manor Royal are airport related and will see an increase in airport generated road traffic due to the development during the operational phase. The mineral and aggregate industries located within the business district (Gatwick Road) are also likely to see an increase in HGV movements during the construction phase. The ES should provide a detailed assessment of the air quality impacts of this traffic on the AQMA.

Ultrafine Particulate Pollution

7.7.5 The EIASR fails to acknowledge the emergence of airports as a significant source of ultrafine particulate pollution in the past eight years^{1,2}, and that Gatwick is no exception to this³. While at this stage it would be impractical to expect the airport to model any such impact, it should recognise in its submission documents that a potential issue does exist, and that to help mitigate any potential future risk from this pollutant that it will undertake long term monitoring to 2039 as a minimum, examining both particle number and the particle size distribution at a representative residential site downwind of the airport. This need for ultrafine particle monitoring in the vicinity of airports is in line with the recommendations of the Government's air quality expert group (AQEG)⁴, and the Government's draft aviation strategy⁵.

Effects Proposed to be Assessed/Approach to Assessment of Effects

7.7.6 Paragraphs 7.7.32 and 7.7.33 set out the proposed air quality model verification. Pollutant concentrations for each scenario year (2018, 2026, 2029, and 2038) will be predicted using the ADMS-Airport dispersion model. CBC request that the specific receptor sites modelled in Crawley should be agreed with the Council and as a minimum, should include sites used in

¹ Atmospheric Environment 45 (2011) pp.6526 – 6533.

² Atmospheric Environment 50 (2012) pp.328 – 337.

³ Report on Ultrafine Particulate Pollution around Gatwick to the GATCOM steering Group – June 2019: Table 1.
<http://www2.westsussex.gov.uk/ds/cttee/gat/gat180719i6a.pdf>

⁴ AQEG Ultrafine Particles (UFP) in the UK. – July 2018. p.11, and p.94 section 7.1 para 2.

⁵ Aviation 2050: The Future of UK Aviation. p.82.

previous (2015) air quality assessments of the airport, so that the work is comparable. Modelling outcomes in previous air quality assessments of the airport, have consistently under-estimated roadside pollutant concentrations by significant amounts at receptor sites in Crawley. If predicted results from the model differ significantly from measured concentrations, it is requested that a choice of suitable additional sites for model verification should be agreed with CBC.

- 7.7.7 CBC welcomes Gatwick's commitment to produce a detailed emissions inventory for airport ground sources as well as LTO aircraft emissions and on/off airport traffic emissions (para 7.7.28). The data should be presented within the ES in a source apportionment format to indicate the airport contribution compared to non-airport contribution.

Emissions Mitigation Assessment:

- 7.7.8 CBC have concerns that uncertainties about future growth associated with the Project and the potential air quality impacts of cumulative developments may contribute to a "creeping baseline" in emissions that may go unrecognised. This is because even major developments are often shown as not having a significant air quality impact based on their predicted concentrations. To address this the proposed ES scoping methodology should make reference to the Air Quality and Mitigation Guidance for Sussex⁶

- 7.7.9 The proposed ES scoping methodology should make reference to the Air Quality and Mitigation Guidance for Sussex.

Odour Assessment

- 7.7.10 CBC consider the approach⁷ in the EIASR (para 7.7.38) for assessment of odour is too simplistic to adequately assess the odour impacts from the airport operations. Odour around the airport at residential locations tends to be described as having a distinctive smell of "aviation fuel". The IAQM guidance advises that best practice is to use a multi-tool approach where practicable, which may include screening, sampling and dispersion modelling. This approach would be more appropriate for this ES assessment in identifying locations where odour is most likely to be detected and inform suitable mitigation.

Other Emissions

- 7.7.11 The ES should include and address any odour or other emissions from the proposed CARE centre and water treatment facilities.

7.8 **Noise and Vibration (Section 7.8)**

Air Noise – Approach to Assessment of Effects (paras 7.8.29-7.8.36)

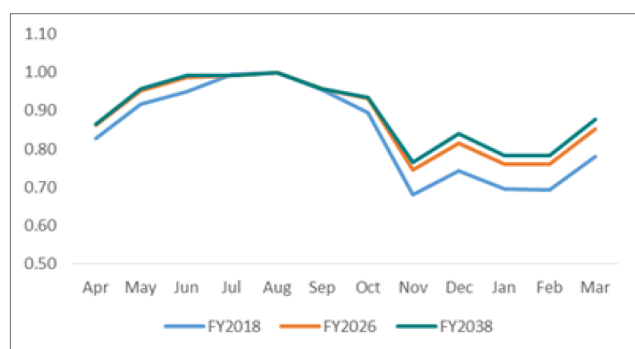
- 7.8.1 CBC consider that the main impacts of a dual runway operation on air noise are:
(i) - the increase in overflights of existing residents both in terms of total noise (L_{Aeq}) and the increase in the number of events and,
(ii) that communities within 6-7km from the end of the runways and to the north of the existing departure route will be 210m closer to departing aircraft.
CBC consider that it is important for the ES to quantify the impacts of both these factors to appropriately measure the noise impact.

⁶ CBC, in partnership with the Sussex authorities, has developed guidance for developers on how to carry out an emissions mitigation assessment to quantify the additional emissions generated by major development, and to monetarise this impact (based on Defra's damage cost approach) in order to define the value of mitigation that should be applied. The basic concept is that good practice to reduce emissions and exposure is incorporated into all developments at the outset, at a scale commensurate with the emissions

⁷ Paragraph 7.7.38 recommends following the Guidance on the Assessment of Odour for Planning (Institute of Air Quality Management, 2018), and proposes a qualitative approach using the source-pathway-receptor concept and an analysis of historic odour complaints.

7.8.2 It is generally accepted that there is no single metric that can evaluate the impact of aviation noise. Acoustically one old Boeing 747-100 is roughly equivalent to 128 x Airbus 320-NEOs as it is about 20dB louder on departure. Given the choice some residents would prefer one single B747-100 to 128 x A320 NEOs as the noise is over and done with in one go. However further from the airfield and at night residents may prefer quieter NEOs which won't wake them up as opposed to one noisier aircraft which might. To measure the total noise the EIASR (para 7.8.29) recommends using the summer 2018 noise contours ($L_{Aeq,16hr}$ & $L_{Aeq,8hr}$) as the base line and then comparing this to the summer contours for future seasons. The summer contours are based on 92 days during the summer season as this is traditionally the noisiest period. However Gatwick is already at near capacity during this season on a single runway operation and any future growth on a single runway operation will be achieved by 'peak spreading', namely outside the busiest periods (see diagram 4.5.1 from the EIASR below). This is also likely to be the case for the dual-runway operation, where growth will be in both the busiest summer period (captured by the 92-day summer contours) and by 'peak spreading' (outside the summer period) and therefore not captured by the summer contours. **Therefore the sole use of the summer contours will not capture the full impact in of 'peak spreading' and the total noise.**

Diagram 4.5.1: ATMs per Month



7.8.3 CBC consider it is necessary to produce L_{den} and L_{night} contours as well as the summer contours as they have the advantage of including all the flights from the whole year⁸. Gatwick are already required by The Environmental Noise (England) Regulations 2006 to produce L_{den} and L_{night} contours for their Noise Action Plans every 5 years, the last one was published in 2019 using 2016 L_{den} contour .

7.8.4 The Environmental Noise (England) Regulations 2006 recommends L_{den} contours of 55dB or above and L_{night} contours of 50dB or above. However since 2006 there has been new research⁹ which recommends adverse effects from aircraft noise can begin at L_{den} 45dB and L_{night} of 40dB. CBC therefore consider that in order to correctly identify the full impact of noise from dual-runway use that the L_{den} and L_{night} contours starting at 45dB and 40dB should be included as part of the ES in order to accurately establish the noise impact, as well as the summer contours proposed .

7.8.5 The other aspect of overflight is the number of events. These are best measured using number-above contours (N65 day & N60 night) as proposed in the EIASR. However, when preparing these contours CBC consider that **all aircraft** over the respective decibel level irrespective of altitude (i.e. the 7000' 'cap' in CAP1498), must be included.

⁸ The 'DEN' stands for Day, Evening & Night and covers the whole year and hence would include the increased flights outside the summer period. The Evening and Night periods attract a 'weighting' of +5 & +10dB respectfully to reflect the relative impact they have on people in relation to the Day noise (10dB increase is roughly equivalent to a doubling of loudness)

⁹ Published by the World Health Organisation (Environmental Noise Guidelines for the European Region (2018))

- 7.8.6 The use of the northern runway will bring departures (for Code C aircraft only) 210m closer to existing communities on the north side of the airport. To assess the impact on this type of aircraft on these communities a noise footprint of the departure of such an aircraft is required. CBC recommend a 60dB & 65dB contour (related to the N-above) for both standard aircraft and the new NEO/max from both main and northern runway and for both east and west departures is provided.
- 7.8.7 Para 7.8.36 of the EIASR states that it is proposed to maintain the existing Noise Preferential Routes (NPRs) for departing aircraft. However there is no indication whether the departure routes can comfortably manage departures efficiently from a dual runway operation, especially during periods when departures dominate (namely early morning with the surge of short haul departures). With the expansion of the long-haul market at Gatwick there will be an increase of wide-bodied aircraft which require greater spacing from smaller aircraft so potentially reducing the number of departures per hour. CBC consider that data on spacing and departure/arrival rates is required as part of the ES. This needs to include data on the maximum number of departures per hour which can safely and efficiently use each NPR based on the present and predicted fleet mix proposed at Gatwick. Should the existing NPR's not be able to accommodate the increase in flights, then full assessment would be needed of any additional routes.
- 7.8.8 It is known that 'go-arounds'¹⁰ have steadily increased in number and in percentage terms since 2012 and therefore as the number of arrivals increase then the number of 'go-arounds' will increase at least proportionally or as the recent trend shows, disproportionately. This point needs to be examined in further detail as 'go-arounds' can be very disturbing for residents and can cause a higher than normal level of anxiety due the low altitude and displaced location of the aircraft. This data needs to form part of the evidence informing the ES.

Ground noise - approach to assessment of effects (paras 7.8.37-7.8.41)

- 7.8.9 A ground noise report was produced by Gatwick in 2016¹¹ but was never published. This report needs to be published as this data will inform the baseline of the ES.
- 7.8.10 The proposal in 7.8.41 is to assess ground noise against absolute benchmarks of 55 dB LAeq for the day and evening and 45 dB LAeq for the night-time. These figures are derived from the internal noise standards specified in BS8233 and relate to 'steady' noise. This is acceptable for the overall general 'hum' from Gatwick but where residents will be aware of individual distinguishable events then a different methodology will be required. The reason being is that Ground noise is considered to be 'commercial or industrial' noise and not air-noise which is considered transportation noise. Therefore individual distinguishable events need to be assessed in the similar manner as with all other commercial or industrial noise which is by using BS4142:2014. This would include (but not exclusively) engine testing and taxiing aircraft close to a receptor (the end-around taxiways and Juliet holding spur).
- 7.8.11 The Gatwick 'hum' in any particular location varies according to wind direction. CBC consider that it would therefore be appropriate to measure the background (L90) noise levels in upwind conditions to ensure a true background noise level. The ground noise propagation should then be calculate using a positive downwind scenario.
- 7.8.12 CBC consider that the 'end-around' taxiways and the new Juliet holding spur must be examined in detail as these both bring taxiing aircraft closer to existing residents. The use of bunds has been mentioned but full calculations and assumptions would need to be published to demonstrate their effectiveness.

¹⁰ Where a landing is aborted due to another aircraft being slow to roll or slow to vacate the runway.

¹¹ Referenced in planning application CR/2017/0116/FUL – Boeing Hangar

Road traffic noise (paragraphs 7.8.42 – 7.8.44)

- 7.8.13 CBC are concerned that there has already been an increase in road traffic ‘spillage’ from the main highways to the side roads and country lanes for airport trips. Even though the total noise will not be comparable to the main roads, the increase can be large and proportionally more disturbing due to its close proximity to residents and due to the fact it is made up by multiple ‘events’ rather than a general hum. It is therefore considered that an assessment should be made of traffic flows on local roads and how this traffic is associated with Gatwick and how it can be mitigated. The current methodology for this the assessment set out in para 7.8.42 is ambiguous and needs to be clarified and other receptor points on the local road network agreed with CBC to establish the impacts

Mitigation (paragraphs 7.8.45 – 7.8.55)

- 7.8.14 CBC consider that the use of sound insulation to mitigate noise is a last resort and if proposed this needs to include the windows, doors and roofs, which are the weak spots on buildings. It should be noted that sound insulation is only effective when the windows are closed so is ineffective during summer months when windows have to be kept open to effectively deal with the effects of summer overheating. Opening the windows exposes residents to the harmful effects of noise, therefore to truly mitigate against the harmful effects of noise additional forms of ventilation are required. Natural forms of ventilation like acoustic louvres are more sustainable and visually acceptable. They are however less effective with very high noise levels at which point mechanical ventilation will be required. Any mitigation scheme will be expected to offer all these options and such measure assessed in line with the Planning Advice Document Sussex.

Construction noise

- 7.8.15 Para 5.3.18 explains that much of the construction work will take place overnight to reduce impact on the operation of the airport, and access roads. This will therefore create noise during the only period of relative quiet for the nearest residents. The ES should consider the additional burden placed on these residents in detail and all forms of potential mitigation must be explored and applied not just the physical measures currently listed in the EIASR. For example, if noise levels are very high or during periods of very hot weather where windows have to be opened for ventilation, mitigation could be alternative temporary accommodation for nearby residents.
- 7.8.16 It is accepted that residents will experience limited vibration from the construction works on site but the off-site construction work on the road network is much closer to residents and needs to be fully assessed as part of the ES.
- 7.8.17 There is potential for use of the Gatwick Goods Yard railhead to increase during the construction phase of the Project, and this may be predominantly at night. This would increase noise from the Goods Yard itself and from HGV traffic which would have an impact on nearby residents in Bowthorpe House and Forge Wood. This should be assessed as part of the ES and must be appropriately mitigated.

7.9 Climate Change and Carbon (Section 7.9)

- 7.9.1 The assessment of climate change and carbon should include as a key element the Government’s commitment to achieving an emissions’ reduction target of 100% by 2050, (as set out in the Climate Change Act 2008 (2050 Target Amendment) Order 2019). This amendment should be included as a key piece of legislation in section 7.9.8, as well as any further guidance Government on aviation and emissions. This assessment should also consider the impact of

other airport expansion projects. Given the importance of reducing greenhouse gases, CBC considers that all greenhouse gases in aviation emissions, and not just CO₂ as proposed in para 7.9.73, should be assessed.

7.9.2 CBC considers that the increase in buildings and hardstanding on the airport as a result of existing and proposed developments (Table 4.6.1) and the Project itself, may create an urban heat island effect, and that the impact from this should be included in the ICCI assessment.

7.10 **Socio-Economic Effects (Section 7.10)**

7.10.1 From the Topic Working Group meeting, CBC understood that Lichfields are undertaking an assessment of on and off-airport employment anticipated to be generated by the Project which is important to understand the impact on the local economy. Para 7.10.15 refers to an Oxera study, but it is not clear if this includes the Lichfield work, nor the detail of this study which should also consider the impacts on employment floorspace need off-airport to maximise benefits in the area. This work should be linked to the Transport modelling work.

7.10.2 Impact on Labour Market assessments, (Tables 7.10.2, 7.10.3), should include the impact of potential local labour shortages created by the new jobs created at Gatwick. This is particularly likely in the low-skilled sectors where Gatwick in the past has been able to pay higher wages than local facilities, such as care homes, and they therefore struggle to find staff, impacting businesses and the local population who may be without services as a result. This could be exacerbated with new jobs created at Gatwick, both in the construction and operational phases and should be assessed.

7.10.3 Increasing jobs at the airport should result in benefits to the local economy and the local population. However, in the Community section of these assessments, consideration should be given to the impact of an increase in jobs at the airport, many of which will be low-skilled, on aspiration and achievement locally. Social mobility is a problem for Crawley, as identified in para 7.10.7 and therefore ought to be scoped into the ES to determine whether growth of the airport will exacerbate, or can be an opportunity to help address this problem. Para 7.10.21 states that *“measures that can enhance the beneficial effects of the Project will also be identified”*. CBC welcome this, and would like to be involved in developing these measures.

7.10.4 CBC is particularly concerned about the intention to scope out effects of the Project on population, (para 7.10.24), on the basis that it is not proposing residential development and therefore would not directly give rise to population effects in terms of changing population levels within the assessment areas. The assertion that *“Future labour demand will be distributed across a wide labour catchment area so no significant impacts on population levels or housing and community infrastructure needs are expected”* is questioned as the majority of staff at Gatwick live close to the airport.

7.10.5 Given the anticipated 2,000 construction jobs and increase of 3,000 jobs directly on airport, (information provided at the Topic Working Groups), it is important that the potential effects on housing demand in the local area are thoroughly assessed. The nature of the jobs being created should be clarified as part of this assessment, as low skilled jobs do not tend to attract long distance commuters because of the cost of those journeys which exacerbates housing pressure locally, in an area already facing considerable difficulty meeting housing needs, especially for affordable housing. Growth at Gatwick should also generate economic growth with new indirect job creation in the surrounding areas. This will also have an impact on housing needs. The correlation between increased jobs and housing needs should be thoroughly assessed and therefore should not be scoped out. Any new housing required will

also create associated infrastructure pressures on transport and community infrastructure, schools, health facilities etc, which should be part of the ES.

7.10.6 CBC understands that a Housing Implications Study is being prepared by GAL, which should be referred to in the EIASR, and this issue should be required to be scoped in until the conclusions of this study have been fully understood.

7.10.7 The assertion in para 7.10.24 that *“It is not considered that there are likely to be direct impacts on residential or commercial properties outside the Project site boundary and there would be no change in flight paths and therefore the potential for effects to arise is limited”* is questioned. There will be new flight paths close to the airport, before the departing flights from the northern runway join existing routes, and therefore there will be residential and commercial properties which will be newly overflown. There will also be a considerable increased frequencies of flights along the existing flight paths, particularly in the early morning. Therefore, the effects on property prices should be assessed.

7.11 **Health and Wellbeing (Section 7.11)**

7.11.1 CBC considers that the health impacts from population change should be included in the assessment, as the Council is requesting that housing impacts should be fully assessed, given the significant increase in jobs anticipated on and off the airport. Therefore, health effects from population change (including consequent demand for health services) should be fully assessed.

7.11.2 It is important that assessments of noise and air quality at both construction and operational phases of the development are linked to the Health Impact Assessment work, given the significant impact these issues have on health.

7.11.3 The response from West Sussex County Council on Health and Wellbeing within the EIASR is endorsed by CBC.

7.12 **Agricultural Land Use and Recreation (Section 7.12)**

7.12.1 CBC have no comments to make.

7.13 **Waste (Section 7.13)**

7.13.1 The response from West Sussex County Council on the waste issues with the EIASR are endorsed by CBC.

7.14 **Major Accidents and Disasters (Section 7.14)**

7.14.1 CBC is concerned that the risks of Transport Accidents, both on the ground and airbourne have been scoped out. Given the increased complexity of airfield operations (ground and air movements) resulting from the operation of a second northern runway, CBC consider that the risk of major incidents involving these operations could increase.

7.15 **Cumulative Effects and Inter-relationships (Section 7.15)**

7.15.1 The EIA Regs in Schedule 4 (5) state that the cumulative effects that could occur as a result of the Project *“in combination with other existing and/or approved projects”* should be taken into

account. CBC considers that this assessment should also take account of other major strategic developments being promoted in the area, in particular the West of Ifield development being promoted by Homes England on Crawley's boundary but within Horsham district. This is because of the scale of this potential project, 10,000 homes, and its very close proximity with the airport. Councils are required to plan to meet the housing figures set through the Standard Methodology calculation which for Crawley in the Plan period to 2035 is 11,281 dwellings. CBC is unable to accommodate all of its housing need within the borough boundary, with the emerging Local Plan making provision for a supply-based minimum of 4,806 dwellings, and therefore CBC is working with neighbouring authorities including Horsham to determine the extent to which they can accommodate Crawley's unmet needs through strategic developments.

- 7.15.2 Expansion of capacity at Gatwick should result in the growth of off-airport employment floorspace, and may increase this housing need still further which is why CBC is requesting that assessment of the impact of the development on the population is not scoped out at this stage.
- 7.15.3 The development of a third runway at Heathrow R3, and other airport expansion in the UK will have an in-combination effect on Greenhouse Gas emissions and therefore these NSIPs should be included in Table 7.15.3, rather than just projects within a 15 km distance. Heathrow's expansion and potentially other NSIPs further afield may also have an impact on transport networks and their in combination effects should be considered.
- 7.15.4 CBC welcomes the fact that the long list will be updated periodically during the EIA process, (para 7.15.18 refers) and would like the opportunity to input into this work.
- 7.15.5 CBC questions whether the Zone of Influence for European designations (Table 7.15.2) can be established prior to the Transport modelling work being done as it may extend further than 20km.

Part 8 Topics Proposed to be Scoped out of the EIA process

- 8.1 The visual effects of aircraft and their vapour trails are very apparent in the skyscape above Crawley and while CBC has little information on the potential impact this may have, there is anecdotal evidence that days are brighter and sunnier when aircraft are grounded (due to drones or volcanic eruptions). Could this have any potential impact on the daylight, sunlight and microclimate (para 8.5.1)?
- 8.2 CBC understands that the timing of the Future Airspace Strategy Implementation (South) work being undertaken by the National Air Traffic Services, the DfT and the CAA, means that any updated flight paths will not be available for the ES and for the Project. However, CBC seeks as much consistency between the two processes as possible, and welcomes the statement in para 8.7.3 that information which becomes available during the course of the EIA process will be reviewed and taken into account.

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Richard Kent
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Contact: Steve Dennington
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Date: 1st October 2019

Dear Sir / Madam,

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

Thank you for your letter dated 3rd September 2019 regarding the above.

The London Borough of Croydon (LBC) firstly acknowledges and agrees that it has been consulted on the Scoping Opinion as an identified Prescribed Party and would wish to be consulted through the consideration of this development by the Planning Inspectorate. LBC therefore welcomes the opportunity to comment on the Scoping Report, which sets out the scope of the environmental assessment for the proposal to make the best use of Gatwick Airport's existing runways. As the London borough of Croydon is not adjacent to the airport our comments are at a more strategic level and the Council will leave any comments on local effects to the adjoining local authorities. LBC's comments therefore focus on the key transport and socio-economic effects of the proposed development on the borough. Comments on how these effects are addressed in the Scoping report are set out separately below.

The Council has recently declared a Climate Change Emergency and is undertaking a Climate Change Commission and Citizens Assembly. While Gatwick Airport is recognised for its economic contribution to the sub-region, aviation clearly has an impact on the environment. It is for Gatwick and the aviation industry more widely to ensure that it can meet current and future climate change and emissions standards, and develop Gatwick in such a way as to minimise its negative impact on the environment and climate change. Taking this forward in the Scoping Report the emphasis should be on ensuring that the proposed development is focused on sustainable growth and improves the environment for now and future generations.

Socio-economic effects

Baseline Data: Gatwick is a significant national and sub regional employment centre and offers both direct and indirect businesses and employment opportunities for our

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residents. As a result of the development it is likely that the borough would supply many of the people, skills and supply chain goods that it needs and the Council would expect the Scoping Report to be able to reflect how this support for Croydon businesses and residents would continue with this development. Paragraph 7.10.3 explains that the data collated to date is about “the local population, local economy and travel to work flows” with the data for the labour market area, including Croydon are being collated.

Comment: For this reason the Scoping Report should clearly indicate that baseline data collected will include the wider region as shown in figure 7.10.2, including the whole of the London Borough of Croydon so that the baseline characteristics of the wider socio economic impacts are properly recorded.

Transport Effects

The Council largely agrees with the proposed scope of the Transport Assessment. However, with respect to transport matters, the Council would like to make some key observations. The key rail interchange at Croydon (presumably East Croydon) is mentioned. The data collection and scope of the transport assessment should therefore analyse the impact of the proposed development and increased airport capacity on this recognised key interchange which is beyond the airport.

The scoping report refers to a commitment to include targets to increase the sustainable mode share for passengers and staff which is welcomed. How these targets will be achieved and their role in mitigating the effects of the proposed development need to be considered. Whilst mode share targets have been indicated for 2022, in the light that the Council has declared a Climate Change Emergency, all travel will need to be sustainable in the medium to long term. Further targets should be developed and agreed looking to the medium term. A guide to the medium term is provided by the Mayor of London’s Transport Strategy. In it the Mayor sets a target for 80% of journeys to be by sustainable means by 2041. Figure 57 of the Strategy usefully breaks this down. In the light of the Mayor’s objectives and the Climate Change Emergency we would strongly question the intention to increase ‘on airport’ parking from its current 46,700 spaces.

Whilst the focus on improving station capacity at Gatwick Airport is fully understood, it is not clear if the scoping report seeks to ensure that such changes are explored adequately to assess whether there will be sufficient capacity to accommodate future passenger growth over the long term. From the Council’s perspective, the Brighton Main Line Improvement Programme (including the Croydon Area Remodeling Scheme) is critical to accommodate future growth along the line, including that of Gatwick, in order to ensure that travelling to and from the airport via train is the most attractive option for passengers. The scoping report should indicate how, as part of the Transport Assessment, the impact of airport growth on passenger numbers and interchange trips at East Croydon Station and other rail stations within Croydon is understood and adequately addressed.

It is considered that there are significant opportunities to increase the proportion of passengers travelling via bus and coach, along with walking and cycling access improvements to the airport. The data listed in 7.6.5 does not appear to cover these modes of transport directly.

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The effects of freight being moved to and from the airport appears to be missing from the scoping, but must be included within the assessment.

The focus on introducing incentives to reduce the number of staff travelling by car and mitigating the impacts of parking at the airport is acknowledged. However, there still appear to be plans to increase overall car parking numbers at the airport (7.6.63). At a time when a number of London Boroughs, including Croydon, have adopted Traffic Reduction Strategies as part of their Local Implementation Plans, it is considered that the airport needs to make a full commitment to traffic demand management measures in order to enable ongoing reductions in the number of car journeys.

Other observations

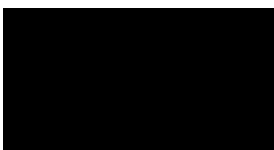
As the documents the Council is required to have regard to for planning purposes, the Mayor's London Plan and Transport for London Strategies and Guidance should be referred to in the legislative and policy context at the relevant sections. Figure 7.10.3 the settlement of Croydon appears to be in the wrong location and should be more central in the borough.

Whilst the Council is supportive of Gatwick's growth it should not come at any price and given our businesses and employees are within the airport's area of influence, we believe that the impact of growth/expansion needs to be considered and carefully managed. There needs to be investment in strategic infrastructure to enable the facilitation of the growth/expansion and consideration needs to be given to air quality, noise and carbon management targets.

We hope that these comments are helpful and will continue to engage with the Development Consent Order Process with the Planning Inspectorate (on behalf of the Secretary of State) in the future. The Council notes that we have a duty to make information available to the Applicant if requested.

If you have any queries regarding the points above, please do not hesitate to contact me.

Yours faithfully,



Steve Dennington
Service Head - Spatial Planning on Behalf of London Borough of Croydon

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by Gatwick Airport Limited for an Order granting Development Consent for the Gatwick Airport Northern Runway

Planning Inspectorate's Scoping Consultation on Gatwick Airport Limited's (GAL's) application for an Order granting Development Consent for the Gatwick Airport Northern Runway (PINS ref. TR020005-000008).

East Sussex County Council Officer Response

30 September 2019

Thank you for the opportunity to comment on the scoping consultation on Gatwick Airport Limited's (GAL's) application for an Order granting Development Consent for the Gatwick Airport Northern Runway, for which comments are requested by 1 October 2019. Officer comments are as follows.

Baseline data

- There is a need for clarity on the baseline data. It is unclear whether the baseline 'do nothing' scenario is referring to 61 million passengers per annum (mppa) by 2032 or 2038. We note that the current Masterplan for Gatwick refers to a 61mppa by 2038. It will be necessary to specify whether the baseline is based on assumptions that new developments will come forward at Gatwick (relating to the current single runway operation) which don't currently have planning permission.
- We would also suggest that a 'low growth' scenario should be considered, particularly taking into account the potential impact of the United Kingdom leaving the European Union and the increasing prominence of the climate change agenda.

The different scenarios relating to growth in passenger number and the need to consider all other possible outcomes with regard to the Third Runway at Heathrow (Chapter 6, Paragraph 6.2.11)

- The Scoping Report is proposing to consider different timeline scenarios which relate to just two possible completion years (either 2026 or 2030) for the Third Runway at Heathrow. The Scoping Report expects the 'worst case' scenario to be the opening of Heathrow's Third Runway in 2030 (the later of the two dates) as the delay in providing additional capacity to Heathrow would result in faster growth of Gatwick.

- The worst case scenario for all topics should include “No Third Runway at Heathrow”, or a “Delayed Heathrow Third Runway beyond 2030-34”. Both of these scenarios would result in much faster growth of Gatwick taking place (in passenger throughput numbers).

The Northern Runway DCO and FASI South (Future Airspace Strategy Implementation –South)

- The DCO and FASI-S are directly related but due to the fact that it is impossible to predict the results of FASI-S, it means there is currently a high degree of uncertainty regarding future flight paths and the possible impacts on the communities below.
- Therefore our concern is that the proposed assessments do not include the cumulative effects of the increased overflight from Heathrow (because at this stage the routes are unknown).
- FASI South will be in place before the Northern Runway becomes fully operational. It is therefore very important that FASI South is designed on the basis that the third runway at Heathrow and the second Runway at Gatwick (Northern Runway) both go ahead.

Traffic and Transport

- **Paragraph 4.4.25:** When looking at existing baseline conditions, staff travel data will be just as important as passenger travel figures. While existing staff numbers have been set out, no forecast of staff numbers has been provided. It is impossible, therefore, to quantify the potential for significant impact of employment on local populations or the road network and other infrastructure in East Sussex.
- **Paragraph 7.6.5:** Traffic data has also been provided by East Sussex County Council (Transport Monitoring team) and should be reflected as such.
- In **paragraph 7.6.6** reference is made to the proportion of Gatwick passengers (27%) travelling to or from the nearby counties of Kent, Surrey and Sussex. It will be important to provide a breakdown by County and to also examine the commuting patterns of Gatwick employees.

The transport mode figures for staff and passengers vary significantly between counties and it is important to recognise that for the many parts of East Sussex there is an absence of non-car alternatives –due to the extremely limited options for rail travel and bus/coach travel to Gatwick, particularly from the central parts of the county.

- **Paragraph 7.6.12** states that “Train capacity serving Gatwick has more than doubled since 2014, with new rolling stock on most of the services calling at the airport. This provides sufficient overall capacity for Gatwick to continue to grow its rail mode share over the next decade.”

However, the increase in capacity has not been shared equally across all routes. It is occurred due to the increase in capacity of Gatwick Express and Thameslink services,

whereas the capacity of Southern services into East Sussex has remained fairly static, and there continues to be no direct rail services to/from Kent. The study will need to establish if the capacity of different routes is sufficient to at least the design year of 2038, or if maintaining Gatwick's sustainable mode share to the level indicated beyond 2029 is dependent on further investment in rail capacity such as Network Rail's "Croydon Area Remodelling scheme, which is not currently a committed scheme, so cannot be relied upon.

GAL should assess the impacts of the Project and identify infrastructure and service enhancements for different routes that will be needed to facilitate the development and delivery of the ASAS to at least the design year of 2038.

- **Paragraph 7.6.18:** the focus is on the M23/A23 corridor with some reference to the A27 and A272 as east – west routes linking into this arterial corridor. However, for south coast towns in East Sussex such as Eastbourne and Hastings, and also towns within the centre of the county (e.g. Uckfield, Heathfield, Crowborough), other north – south and east – west routes are more important for access to the Airport and the connection into the A23/M23 corridor.

Therefore GAL need to recognise the role that routes such as the A21, A22, A267 and A264 perform in providing access between the south coast, as well as central East Sussex, and the Airport.

- **Paragraph 7.6.19:** the text alludes to a 1 hour 20 minute journey time between Folkestone and Gatwick via the A23/A27/A259 corridors however these journey times can only be achieved via alternative routes (via the M20/M25). This needs to be clarified within the body of the text to avoid any mis-interpretation of the situation.
- **Paragraph 7.6.25:** GAL should review the sustainable transport mode share for employees, which is currently shown as 42%. Whilst progress has been made in increasing the sustainable transport mode share for air passengers, this has been more challenging for staff. Therefore, consideration should be given to different mode share scenarios for employee trips with an assessment of the worst case scenario (continuation of current staff travel patterns).
- **Paragraph 7.6.33 – 34:** As the Gatwick Airport version of the South East Regional Transport Model (SERTM) has not yet been developed and finalised, it cannot yet be used to determine the area over which significant changes to travel demand flows are likely. This means that the assessment of the extent of network over which mitigation has to be considered will be less accurate. GAL should complete their assessment and identify what mitigation measures are required before the scoping area is finalised. In addition, from an East Sussex perspective, additional network detail and coding is available from the A22/A26 Corridors model which has also been derive from SERTM, which can be made available at request.
- **Paragraph 7.6.41:** It is not clear if the A27 corridor is outside the area of detailed modelling. There is a prevalence of long-standing congestion issues on the corridor that

could be exacerbated by the Project. Planned housing development will not be equally distributed across the south coast and there is a choice of competing routes between A22, A21 and A23 so travel patterns can be expected to change as a result of the Project. The A27 corridor is located within the wider area of simulation modelling for which it is proposed to keep the SERTM level of detail.

To ensure that the Model will accurately route traffic to/from Gatwick based on a realistic simulation of main junctions along the coastal corridor between Eastbourne, Wealden and Lewes (and potentially Bexhill/Hastings) the most affected parts of the A27/A259 corridor (such as A27 Lewes – Polegate and Bexhill) extending to Hastings should be included in the area of detailed modelling.

- As shown in **Diagram 7.6.1**, the proposed structure of the demand model splits airport-related highway demand into passenger and employee trips. It should be clarified that the model will also handle demand made by trips by suppliers to airport businesses and airlines –goods delivery trips - and visitors to the airport, such as people using the airport hotels without being air passengers or staff, whether being guests or attendees of the hotel conferencing facilities or visitors to on-airport businesses.
- **Paragraph 7.6.42:** It is noted that rail modelling will extend down to and along the Sussex Coast, which is welcomed. To ensure consistency to assessing mode share, it is desirable that both the rail and highway modelling should be undertaken over a similar geographical area.
- **Paragraph 7.6.61** (Wider Assessment of Traffic and Transport) makes reference to the Transport Assessment which will be produced, and which will include mitigation proposals. It also makes reference to the existing Airport Surface Access Strategy (ASAS). The increase in staff and passengers travelling to and from East Sussex will need to be mitigated effectively. Careful consideration will need to be made of how bus/coach and rail services to and from Gatwick can be improved to encourage non-car travel to the airport.

In addition, taxis are often utilised by East Sussex residents who have no public transport alternative, for whom taking a car not a viable option, or those who have limited mobility. Such commuters also rely on lifts to / from the airport from family or friends. Whilst we recognise that restricting the use of drop-off / pick-up areas reduces congestion outside the front of the airport entrance and improves safety, it increases overall journey time for passengers who require a lift to/from the airport, and disrupts the end-to-end journey, therefore impacting on the overall journey experience; whether this is for leisure or business purposes. It is therefore important that these drop-off / pick-up facilities are retained and potentially enhanced if no additional public transport provision is made available. Integration of all modes needs to be a key consideration, with options available which cater for all needs.

It is likely that the details of the mitigation required will need to go beyond the details included within the ASAS. Therefore we would expect an updated ASAS to be developed as part of the DCO process.

- **Paragraph 7.6.63:** The proposed approaches to mitigation should additionally include provision to increase physical highway capacity to address residual issues. It may also be necessary to consider additional bus/coach services which are likely to see significant employee commuter and passenger demand to Gatwick.

In relation the first bullet point, the Gatwick Area Transport Forum only meets annually and is not constituted as a consultative body. The Gatwick Area Transport Forum Steering Group - which includes the local transport authorities, local planning authorities, the train operation company, Highways England, the local bus operator and other stakeholders - provides a more suitable forum for consultation and coordination of approach to delivering transport objectives and initiatives.

- **Paragraph 7.6.65 - 66:** The Construction Traffic Management Strategy should include appropriate routes for the movement of construction materials to site by road; proposals for how construction workers will travel to and from the site – including how this will be achieved by sustainable modes – and if construction workers do travel by car, where they will park.

Noise Impacts Health and Wellbeing

- We endorse the response from Crawley Borough Council regarding issues of noise.

From an East Sussex perspective, our approach has been consistent for a number of years in relation to seeking appropriate mitigation for our residents, particularly in the north and central parts of the county (Crowborough, Heathfield and Uckfield areas) which are most affected by aircraft noise. As a consequence, we would want to ensure that the following is considered:

- a more dispersed flight path is implemented where (albeit) more people are affected, less people are affected more intensely;
- use is made of more efficient routes by greater utilising Continuous Descent and Climb operations;
- enabling aircraft to climb more steeply than they do at present to further minimise noise impacts on communities;
- noise insulation is provided for residential properties and businesses where appropriate; and
- the continuation of the Noise Management Board, or an appropriate forum, to support and mitigate (wherever possible) the negative impact of aircraft noise on local communities.

Health and Wellbeing

- East Sussex Public Health endorses the response from West Sussex in relation to health and wellbeing.
- In particular, East Sussex would like to propose to be included both as consultees to the proposed Health Impact Assessment (HIA) and also to request that the area of East Sussex is included in the HIA, along with West Sussex and Surrey.

From: [Suzanne Parkes](#)
To: [Gatwick Airport](#)
Cc: [Kim Tagliarini](#); [Jamie Pourier-Benham](#)
Subject: Gatwick EIA Scoping Consultation - Elmbridge Borough Council Response
Date: 30 September 2019 12:26:56
Attachments: [image001.png](#)

FAO: Richard Kent,

Thank you for consulting Elmbridge Borough Council on Gatwick Airport Limited's (GAL's) application for an Order granting Development Consent for the Gatwick Airport Northern Runway (PINS ref. TR020005-000008).

Set out below are officer comments on the Environmental Impact Assessment (EIA) and the information we consider should be provided in the Environmental Statement (ES):

Traffic & Transport

Figure 7.6.1 of Appendix 2 - Figures, identifies the proposed Highways Assignment Model Extent. Two areas are identified 1) Simulation Areas and 2) Area of Detailed Modelling. In regards to the Area of Detailed Modelling it is felt that this should be extended to include the A3 heading north from the M25 Junction 10 up to New Malden. As set out in paragraph 7.6.6 of the EIA Scoping Report Main Text, Greater London is the largest passenger source market (42% of passengers). However, whilst paragraph 7.6.18 acknowledges the A23 as a key route connecting south London and Croydon to Gatwick Airport, there is no reference to the similar role that the A3 plays in connecting central and other areas of south London to the M25 and Gatwick Airport.

Ecology & Nature Conservation

Paragraph 7.3.26 of the EIA Scoping Report Main Text, states that the initial search area for European designated sites (including SACs, SPAs and Ramsar sites) was 20km from the Project boundary to allow for effects arising from vehicle emissions. As shown in Figure 7.3.1 of Appendix 2 – Figures, the Thames Basin Heaths SPA falls just outside the 20km buffer for International Statutory Designated Sites and Study Area. Given the comment above (extending the Area of Detailed Modelling to include the A3 north from M25 Junction 10) and coinciding with para. 7.3.26 of the EIA Scoping Report Main Text, it is considered that the potential effects on the Thames Basin Heaths SPA should also be assessed as part of the ES.

If you have any queries regarding these comments please do not hesitate to contact me.

Kind regards

Suzanne

Suzanne Parkes BSc (Hons), MSc, MRTPI, RICS, Dip CMI
Planning Policy & Strategy Manager (Strategy & Policy)
Direct Line – 01372 474810
Email - sparkes@elmbridge.gov.uk

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Shaping Elmbridge A new Local Plan



Consultation closes on 30 September 2019



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Mr Richard Kent - Senior EIA and Land
Rights Advisor
Planning Inspectorate
National Infrastructure Planning
Temple Quay House (2 The Square) Temple
Quay
Bristol
Avon
BS1 6PN

Our ref: KT/2019/126100/01-L01
Your ref: TR020005-000008
Date: 20 September 2019

Dear Mr Kent

Planning Act 2008 (As Amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017(The EIA Regulations) – Regulations 10 And 11

Application by Gatwick Airport Limited (GAL) (The Applicant) For An Order Granting Development Consent For The Gatwick Airport Northern Runway (The Proposed Development)

Scoping Consultation And Notification Of The Applicant's Contact Details And Duty To Make Available Information To The Applicant If Requested

Gatwick Airport, Horley, RH6 0NP

Thank you for consulting us on the above we have the following comments to make.

Flood Risk

Section 5.2.55 - 57 discusses revisions to the existing surface water drainage strategy, which are also depicted within Figure 5.2.1e. It is stated that the surface water drainage strategy will be developed in consultation with the Environment Agency and Lead Local Flood Authority, which is noted. Reference is also made to the possible extension of the existing culvert that carries the River Mole/Crawters Brook beneath the runway, this is an aspect of particular interest as further information to demonstrate that flood risk will not be increased will be necessary. The reference to a possible flood storage area in the vicinity of Pond A is also noted, further information should be provided on this aspect. The management of flood risk from all sources, taking into account the latest guidance and information on climate change, should form part of the EIA process.

Section 7.5 Water Environment

Section 7.5 includes information on the proposed assessment of flood risk and surface water drainage. The production of a Flood Risk Assessment (FRA) in accordance with the planning practice guidance and National Planning Policy Framework (NPPF) is noted, this is certainly a requirement of this proposal. The FRA should incorporate the latest guidance on climate change, this aspect is referenced as part of section 7.5.15. The FRA should clearly demonstrate how the risk to flooding from both fluvial and surface water will not be increased as a result of any development on the site.

Due to the timeline of this project, it is feasible that updated guidance could be released on factors such as climate change, flood risk extents and planning or policy guidance associated with flood risk during the development phase of this project. GAL should be prepared to implement new guidance/policy as appropriate, and this may result in changes to the baseline scenarios.

Section 7.5.13 considers the risk of flooding from reservoirs. It would be prudent to understand how the flood storage area owned and operated by GAL situated on the Gatwick Stream close to Crawley Sewage Treatment Works is viewed in relation to the risk to flooding from reservoirs. Reference to the location of this flood storage area does not appear to be made within this section of the report.

It is noted that work is being undertaken on a surface water model at the present time. The RoFSW mapping can be used as a starting point when assessing surface water flood risk, though a detailed FRA should utilise the most up to date and most accurate information that is available at that time. With this in mind, there is an expectation that the FRA will use data from a detailed surface water model of the study area. It is noted that reference is made to this aspect in section 7.5.5.

Groundwater and Contaminated Land

We have reviewed the EIA Scoping Report dated September 2019, specifically Sections 7.4 (Geology and Ground Conditions) & 7.5 (Water Environment). With respect to ground conditions and the potential for contamination to be present, it is noted that a desk-based Phase 1 Preliminary Risk Assessment (PRA) will be undertaken. The PRA will be used to determine whether an intrusive ground investigation will need to be undertaken to assess whether mitigation or remedial measures for the protection of Controlled Waters are required. These proposals are acceptable to us. With regards to surface and foul water disposal, few major changes to the current regimes are proposed, but further desk studies are proposed to ensure existing datasets are up-to-date. It is not anticipated that the current extensive monitoring programme for surface water disposal will be subject to any changes. This is acceptable and we have no further comments.

Fisheries, Biodiversity and Geomorphology

We would like to see stronger links and references made between the sections on ecology and water environment. This is because the water environment section deals with the Water Framework Directive which has ecological implications which should interlink with the ecology chapter.

Land and Water

We are satisfied that the elements that might impact Water Quality are satisfactory and comprehensive. The section on Waste also appears to include all relevant elements.

We hope you find our comments useful.

Yours sincerely

Ms Jennifer Wilson

Planning Specialist

Direct dial 0208 474 6711

Direct e-mail kslplanning@environment-agency.gov.uk

Environment Agency

Orchard House Endeavour Park, London Road, Addington, West Malling, Kent, ME19 5SH

Customer services line: 03708 506 506

Email: enquiries@environment-agency.gov.uk

www.gov.uk/environment-agency

From: [Ruth Ormella](#)
To: [Gatwick Airport](#)
Subject: Gatwick Airport Limited Scoping consultation - Att Richard Kent
Date: 27 September 2019 16:17:27
Attachments: [image002.png](#)
[doc16067720190927145650.pdf](#)

Dear Richard Kent,

Please accept this email as a formal response from Epsom and Ewell Borough Council to your attached letter dated 3 September 2019 regarding the subject.

The key issues of noise, air quality and transport are of particular interest to Epsom and Ewell, and I note that these are included in the scoping report and will form part of the Environmental Statement for the Proposed Development. The authority intends to make formal comments on the application, Preliminary Environmental Impact Report and Environmental Statement, and agree that the proposal is EIA development.

Comments on Scoping Report

Local Policy

The key local planning policies to be considered during the EIA process, where relevant to environmental topic should include the adopted Development Plan for Epsom and Ewell Borough Council. Epsom and Ewell Core Strategy 2007, Development Management Policies 2015 and emerging local plan policies should be considered where relevant to the assessment.

Statutory Consultation Bodies

While Epsom and Ewell Borough Council is not part of the Gatwick Officers Group (GOG) and the technical groups, we are a Local Planning Authority within the area, and should be included in consultation as part of the DCO process. We would like to be consulted on the Preliminary Environmental Information Report and draft Environmental Statement (PEIR/ES).

Need and Alternatives Considered

The options and alternatives set out in the scoping for the PEIR/ES are accepted.

Further Sections

Existing Site and Operation, Project Description, Approach to the EIA, are accepted.

Specific Comments

- Scope of Noise and Vibration

It is accepted that Epsom and Ewell is distanced from Gatwick Airport and as such does not have a ground noise assessment monitoring point, and is not part of the air noise baseline data set. The effects proposed to be assessed are agreed, the approach to the assessment of effects is agreed. Noise issues scoped out is agreed.

- Scope of Traffic and Transport

Proposed scope of traffic and transport assessment is agreed. Epsom and Ewell is interested in the impacts to the strategic highway network that serves the Borough, and ensuring that the modelling covers the Borough where appropriate.

- Scope of Air Quality

Proposed scope of the air quality assessment is agreed. Epsom and Ewell has declared an AQMA in respect to emissions from road transport. The environmental impact assessment needs to take into account potential impacts, and harm from the proposal particularly in view of the Borough's significant housing requirement.

In conclusion, Epsom and Ewell look forward to considering the proposal, being consulted and commenting on the Preliminary Environmental Information Report and draft Environmental Statement, and being part of the DCO process.

Regards

Ruth Ormella MRTPI
Head of Planning
Epsom & Ewell Borough Council
Town Hall

Tel: 01372 732390
Email: rormella@epsom-ewell.gov.uk



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Richard Kent
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

South East & London Area Office
Bucks Horn Oak
Farnham
Surry
GU10 4LS

Area Director
Craig Harrison

VIA EMAIL ONLY

Your Ref: TR020005-000008
gatwickairport@planninginspectorate.gov.uk
Our ref: T 23/Planning / NSIP Gatwick

Dear Richard

**Planning Act 2008 (as amended) and The Infrastructure Planning
(Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) –
Regulations 10 and 11**

**Application by Gatwick Airport Limited (GAL) (the Applicant) for an Order
granting Development Consent for the Gatwick Airport Northern Runway (the
Proposed Development)**

**Scoping consultation and notification of the Applicant's contact details and
duty to make available information to the Applicant if requested**

Thank you for consulting the Forestry Commission on the scope of the Environmental Statement (ES) in your letter dated 3rd September 2019.

The Forestry Commission is the Government experts on forestry & woodland and a statutory consultee (as defined by Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009)¹ for major infrastructure (Nationally Significant Infrastructure Projects (NSIPs)) that are likely to affect the protection or expansion of forests and woodlands (Planning Act 2008). We have reviewed the Environmental Impact Assessment Scoping Report in particular sections relating to woodland and trees

¹ <http://www.legislation.gov.uk/uksi/2009/2264/contents/made>

The Forestry Commission's summary points are:

Ancient Woodlands, Ancient Trees and Veteran Trees are acknowledged as irreplaceable habitats and are a part of our Historical Natural heritage. It is not possible to fully compensate for the loss of any irreplaceable habitat such as Ancient Woodland, therefore, the Forestry Commission recommends:

- Doing everything possible to avoid the loss or damage to ancient woodland and veteran trees;
- Where this is not possible, a significant package of ecologically significant compensation, which collectively delivers ecological enhancement to our ancient woodland and veteran tree infrastructure, is secured in perpetuity.
- Encourage a thorough assessment of any loss of trees and woodlands within the project boundary.
- Compensate and the use of buffer zones to enhance the resilience of neighbouring ancient woodlands. These ones could include further tree planting or a mosaic of semi natural habitats.
- Encourage the design of green infrastructure to link the existing conurbations to adjacent countryside.
- Locally sourced timber is used in construction of appropriate structures

Ancient Woodland

Ancient woodlands are irreplaceable. As highlighted in the National Planning Policy Framework revised July 2018²: Irreplaceable habitats include ancient woodland, ancient trees and veteran trees:

Paragraph 175c – *“development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists”*. They have great value because they have a long history of woodland cover, with many features remaining undisturbed. This applies both to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS).

Within the Scoping Report ancient woodland has been identified within the development area.

The Forestry Commission has also prepared joint standing advice with Natural England on ancient woodland, ancient trees and veteran trees³ which we refer you to as it notes that ancient woodland, ancient trees and veteran trees are an irreplaceable habitat, and that, in planning decisions, Plantations on Ancient Woodland Sites (PAWS) should be treated equally in terms of the protection afforded to ancient woodland.

Within 7.3.5 it states that Ancient woodland base map has been obtained from the MAGIC website. Woodland under 2 hectares may not appear on the Ancient Woodland Inventory but may still have ancient woodland characteristics so we would support that

² <https://www.gov.uk/government/collections/revised-national-planning-policy-framework>

³ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

a detailed investigation is undertaken to ascertain whether any additional ancient woodlands exist that may be impacted by the proposed scheme.

One of the most important features of Ancient woodlands is the quality and inherent biodiversity of the soil; they being relatively undisturbed physically or chemically. Direct impacts of development that could result in the loss or deterioration of ancient woodland or ancient and veteran trees include:

- damaging or destroying all or part of them (including their soils, ground flora or fungi)
- damaging roots and understorey (all the vegetation under the taller trees)
- damaging or compacting soil around the tree roots
- polluting the ground around them
- changing the water table or drainage of woodland or individual trees
- damaging archaeological features or heritage assets

It is therefore essential that the ancient woodland identified is considered appropriately to avoid the above impacts.

We particularly refer you to further technical information set out in Natural England and Forestry Commission's [Standing Advice on Ancient Woodland](#) – plus supporting [Assessment Guide and Case Decisions](#). The standing advice provides details on the hierarchy of: avoid impacts, mitigate impacts and compensate as a last resort. This hierarchy could apply to any deterioration to woodland, ancient trees and veteran trees within the proposals.

Within section 7.3.33 we welcome the inclusion of ancient woodland and other areas of mature broadleaf woodland. An observation is that woodland can be in different states of maturity dependant on management therefore we would suggest all areas of broadleaf woodland are included.

The scoping report does not refer to veteran trees. Ancient trees and veteran trees can be individual trees, or groups of trees including within hedgerows⁴. We would support the inclusion of notable trees within the ES, ancient and veteran trees can be individual, clumps or groups. Site investigations for the ES should identify ancient and veteran trees.

Any potential impact on landscape regarding Ancient Woodland, Ancient trees and Veteran trees and other woodland should be included in the Environment Statement.

Scoping Report Figures:

Within FIGURE 5.2.1e it indicates Potential areas for flood compensation. The ES should consider the potential impacts and disturbance within the buffer zone of the ancient woodland.

FIGURE 5.2.1f the Main Construction Compounds is located next to the ancient woodland. The ES should consider the potential impacts and disturbance within the buffer zone of ancient woodland.

⁴ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

Within FIGURE 7.3.– there is only Ancient woodland identified, we would like to see all woodland assessed for value and impact, and to be considered within the scheme design and any mitigation/compensation provisions with a minimum 'no net loss' and ideally 'net gain' for ecological habitats including woodlands.

Mitigation:

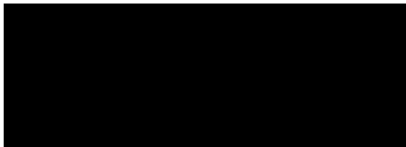
With regard to mitigation we suggest that a UKFS-compliant Woodland Creation Design Plan is considered for any potential woodland creation habitat proposed in the development; including its long term management to address future management including land locked areas to ensure suitable planting schemes and the appropriate infrastructure is in place.

A UKFS compliant woodland management plan should be undertaken for any woodland management of existing woodland proposals put forward as part of the mitigation package.

The Forestry Commission would welcome the opportunity to be engaged in the planting proposals.

If you wish to consult us further in relation to the Environmental Statement with the Forestry Commission please contact the South East and London Office at the above address.

Yours sincerely



Richard Pearce
Partnership and Expertise Manager
Forestry Commission

From: [Karen Thorpe](#)
To: [Gatwick Airport](#)
Subject: Gatwick Airport Northern Runway - TR020005-000008
Date: 27 September 2019 15:21:50
Attachments: [image002.png](#)

Good afternoon,

Thank you for sending the relevant information and material regarding the Gatwick Airport Northern Runway.

Harlaxton Gas Networks Ltd. at this time has no assets in the area, and will not be implementing any in the near future, therefore Harlaxton has no comment to make on this scheme.

Kind Regards

Karen Thorpe

For any electricity power issues please call Harlaxton Energy Networks 0800 055 6288.

For any gas issues please call the National Gas Emergency Line 0800 111 999.



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From: [Karen Thorpe](#)
To: [Gatwick Airport](#)
Subject: Gatwick Airport Northern Runway - TR020005-000008
Date: 27 September 2019 15:21:52
Attachments: [image001.png](#)
[image003.png](#)
[image008.png](#)
[image010.png](#)
[image011.png](#)
[image012.png](#)

Good afternoon,

Thank you for sending the relevant information and material regarding the Gatwick Airport Northern Runway.

Harlaxton Energy Networks Ltd. at this time has no assets in the area, and will not be implementing any in the near future, therefore Harlaxton has no comment to make on this scheme.

Kind Regards

Karen Thorpe
Distribution Administrator
0844 800 1813

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For any gas issues please call the National Gas Emergency Line 0800 111 999.



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BS1 6PN

Steve Pearce
Airport Planning Manager

Highways England
The Cube
199 Wharfside Street
Birmingham
B1 1RN

01 October 2019

Dear Sir/Madam,

PLANNING ACT 2008 (AS AMENDED) AND THE INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (THE EIA REGULATIONS) – REGULATIONS 10 AND 11

APPLICATION BY GATWICK AIRPORT LIMITED (GAL) (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE GATWICK AIRPORT NORTHERN RUNWAY (THE PROPOSED DEVELOPMENT)

SCOPING CONSULTATION AND NOTIFICATION OF THE APPLICANT'S CONTACT DETAILS AND DUTY TO MAKE AVAILABLE INFORMATION TO THE APPLICANT IF REQUESTED

Under the Planning Act 2008 (as amended) and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, Highways England is a statutory consultee on applications for Development Consent Orders likely to affect roads for which the Secretary of State for Transport is the highway authority (the Strategic Road Network (the SRN)).

Gatwick Airport is connected directly to the SRN via the M23 Spur, M23 junction 9 and the A23. The Proposed Development is likely to require enhancements to the SRN in the vicinity of the airport which will be determined during the ongoing development of the proposals.

Highways England welcomes and encourages pre-application discussion on schemes which will impact the SRN. We therefore welcome the opportunity to provide advice on the scope of any Environmental Statement, in respect pursuant to the procedures set out in the Infrastructure planning (Environmental Impact Assessment) Regulations 2017, in respect of the Proposed Development.

We have set out below both general and specific areas of concern that Highways England would wish to see considered as part of an Environmental Statement. The comments relate specifically to matters arising from Highways England's responsibilities to manage and maintain the SRN, as set out in our [Licence](#).

Comments relating to non-trunk roads should be sought from the relevant local highway authorities.

General aspects to be addressed

Highways England's principal concern with any development proposal is the impact generated on the SRN. The Applicant has commenced traffic modelling which will be used to support their proposals, and is sharing information on the early development of these models with Highways England. Prior to DCO submission, Highways England will need to be satisfied that the impact of the development on the SRN has been modelled robustly and, if necessary, all works to provide capacity on the network to accommodate the development will achieve their objectives. This should include microsimulation modelling of the area.

We welcome reference to meetings held with Highways England in Table 2.3.1 and the desire to include Highways England in the Topic Working Group focusing on surface access. The Secretary of State's requirements with regard to development impacting on the Strategic Road Network are contained within [DfT Circular 02/2013: The strategic road network and the delivery of sustainable development](#) (the Circular). The Applicant will need to demonstrate that these tests have been addressed through the development of its planning application.

An assessment of transport related impacts of the proposal should be carried out and reported as described in the Department for Transport '[Guidance on Transport Assessment \(GTA\)](#)'. It is noted that this guidance has been archived, however it still provides a good practice guide in preparing a Transport Assessment. In addition, the Ministry of Housing, Communities and Local Government (MHCLG) also provide guidance on preparing Transport Assessments. Highways England would appreciate early sight of the scheme's Transport Assessment, and should be consulted on the scope of this assessment to ensure all relevant tests have been included.

Traffic and environmental impact arising from changes to the SRN, the increase/re-routing of traffic post-opening (including phased opening) of the Proposed Development, during construction, traffic volume (including cumulative effects), composition or routing change and transport infrastructure modification should be fully assessed and reported.

Adverse change to noise and air quality should be particularly considered, including in relation to compliance with the European air quality limit values and/or in local authority designated Air Quality Management Areas (AQMAs).

Location specific considerations

Highways England will work with the Applicant on matters relating to the design and development of changes to the SRN. Whilst not covered through the Environmental Impact Assessment specifically, the Applicant will need to demonstrate that all proposals for changes to the SRN to mitigate the impact of the development are in line with the various tests described in the Circular, including;

11. Local authorities and developers will be required to ensure that their proposals comply in all respects with design standards. Where there would be physical changes to the network, schemes must be submitted to road safety, environmental, and non-motorised user audit procedures, as well as any other assessment appropriate to the proposed development. The Design Manual for Roads and Bridges sets out details of the Secretary of State's requirements for access, design, and audit, with which proposals must conform.¹

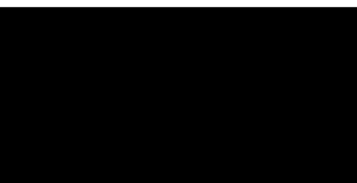
The applicant shall identify the distribution of traffic on the SRN as a result of the expansion proposals, and will complete capacity assessments of relevant SRN links and junctions to ensure that the SRN is able to continue to fulfil its strategic function. For clarity, this assessment should also include the impacts of both construction traffic and the reduction in capacity as a result of the construction work itself.

The applicant shall confirm locations to be assessed in the Transport Assessment through engagement with Highways England via Topic Working Groups. This shall include all locations where there is a material change to traffic flows as a result of the application, including those distant from the boundary of the Proposed Development.

Highways England is committed to working with the Applicant to ensure alignment with policy contained within the Circular, and in line with guidance provided by [Planning for the future: A guide to working with Highways England on planning matters](#). Particularly, the Applicant shall share further detail on the scope of their Transport Assessment, for comment on by Highways England, as information becomes available prior to both their statutory consultation and the subsequent submission of a Development Consent Order application. By providing comments in this way, Highways England would expect that the Transport Assessment robustly addresses all the tests outlined in the Circular.

The above comments imply no pre-determined view on the part of Highways England as to the acceptability of the proposed development in traffic, environmental or highway terms. Highways England is working closely with the Applicant to understand the impact of the Proposed Development, and we are keen that this proactive engagement continues to ensure that Highways England's requirements are met through the development planning process.

Yours sincerely



Steve Pearce
Airport Planning Manager
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Cc: Tim Neate, Paul Harwood (Highways England)

¹ [DfT Circular 02/13: The strategic road network and the delivery of sustainable development](#), paragraph 11.

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Date 1 October 2019

[By email only to gatwickairport@planninginspectorate.gov.uk](mailto:gatwickairport@planninginspectorate.gov.uk)

Dear Mr Kent

Gatwick Airport Northern Runway - EIA Scoping Notification and Consultation

I refer to your letter of 3 September 2019 requesting comments on the scope of the Environmental Impact Assessment for the Gatwick Airport Northern Runway proposal.

In the view of Historic England, the scoping report provides a generally well-balanced assessment of the matters to be included in an environmental report in respect of the historic environment and heritage assets likely to be affected. I set out below some comments on matters of detail that may be considered helpful in fine-tuning some aspects of the scope of the assessment:

Para 7.1.25 – potential climate change effects on the historic environment are dismissed but we would suggest that there may be some effects; e.g. climate generated change in hydrology and ground water conditions may affect archaeological preservation environments through drying out of soil or rapid changes in ground saturation.

Para 7.1.26 – the study area for archaeological assessment is limited to 1km circumference of the airport; this is very limited and we think this could be wider, perhaps to align with the 3km zone anticipated for other heritage asset types.

Para 7.1.27 – assessment of effects of historic buildings is limited to 3km; this is likely to be sufficient in most cases. It is acknowledged within the report, however, that some heritage assets beyond 3km could be affected and therefore may be bought within the scope of the EIA. These are not specified and it would be helpful to have early clarification of which sites or buildings these may be so that appropriate assessment of effects can be factored into the EIA.

Table 7.1.1 – we concur that this is comprehensive in respect of the historic environment.

It is proposed to scope out any assessment of effects on urban heritage assets (para 7.1.39); however, a number of assets within the 3km assessment area are within the Horley urban

area. It is not clear, therefore, if all assets in urban areas these will be scoped out or if sites falling within the ambit of para 7.1.27 will be an exception. We request clarification.

While assessment of effects on individual heritage assets may be included within the scope of the EIA, there is no specific mention of settlement level impacts at Charlwood; given the concentration of assets in this location and its proximity to the airport, and in particular to the repositioned northern runway, there is a case for such an assessment to be included.

Given the scale of the reproductions in the report it has not been possible to check the accuracy of the heritage designations map (figure 7.1.1, Volume 2). We assume it has drawn its data from the respective Historic Environment Records; it would be helpful if these were to be confirmed as the sources for the data.

There is a case for inclusion of heritage/cultural facilities within the non-residential receptors category of the noise assessment chapter (para 7.8.25). The enjoyment and appreciation of heritage sites, museums & galleries, and historic parks and gardens could be disproportionately affected by changes in the noise regime and visual intrusion resulting from more flights and additional ground facilities proposed by the project. Some of these could be well beyond the 3km radius set for the heritage impacts indicated above (e.g. Hever Castle).

The proposed geographical limitations (1km for archaeology, 3km for built heritage) are applied to the proposed cumulative assessment matrix (table 7.15.2); if an extension of those study area limits (e.g. to the archaeological impacts) are agreed, the revised areas of assessment should apply to the cumulative impacts also.

These comments are based on the information provided by you at this time and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently arise from this or later versions of the scheme and which may, in our view, have adverse effects on the historic environment.

Yours sincerely



Alan Byrne
Historic Environment Planning Adviser

HORLEY TOWN COUNCIL

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By email: gatwickairport@planninginspectorate.gov.uk

25 September 2019

Your Ref: TR020005-000008

Dear Mr Kent,

Application by Gatwick Airport Limited (GAL) (the Applicant) for an Order granting Development Consent for the Gatwick Airport Northern Runway (the Proposed Development); Scoping Consultation

Thank you for your letter of 3 September 2019 together with accompanying documents giving Horley Town Council the opportunity to comment on the scoping report for the Environmental Statement (ES) relating to the Proposed Development. These documents were considered by Councillors at the Planning Committee held on 24 September 2019 and had previously been circulated to all 18 Horley Town Councillors for consideration and comment.

As a direct neighbour to Gatwick Airport, Horley Town Council feels it is vitally important to participate in the process to ensure local views are well represented. Having given much consideration to the information available Horley Town Council feel the following issues should be included in the ES.

- Horley Town Council wishes to express concern that scoping area includes Riverside Garden Park for transport infrastructure; including Gatwick Lake being designated as a balancing pond for the very first time in the airport's history. This is a green open space owned by Reigate and Banstead Borough Council and a very popular and well used area by both local residents and airport staff. In addition, it should be noted that the lake is licensed to the local piscatorial club. We need to see greater clarity on the airport's intentions in respect of this area.
- Careful consideration needs to be given to the impact from the regular use of the Northern Runway on the residents living in the southern part of Horley adjacent to the airport boundary. This is because it is much closer to residences than the main runway; particularly as its centre line which is 210 m closer than the main runway. Our concerns centre around noise & air quality.

- The impact of noise and air quality from the increase in the number of movements and the fact that the peak will now be spread across a greater part of the day than presently; as airlines fill up the current spare capacity in the shoulder periods.
- Horley Town Council would like to see a statement that if or whenever the wide spaced Southern Runway comes into being then the Northern Runway will revert to being for standby/emergency use only.

Finally, Horley Town Council would like to highlight that although the scoping document concentrates on the regular use of the Northern Runway; GAL are also looking to increase movements on the main runway which comes under permitted rights. However, we believe that because of the cumulative effects from both runways on the local communities, the scoping document should consider these.

We hope that you will give careful consideration to the concerns raised in this letter and we look forward to your response.

Yours sincerely,



Town Clerk

CC: Cath Rose Head of Corporate Policy at Reigate & Banstead Borough Council.
Cath Rylands Senior Planning Policy Development Officer at Reigate & Banstead Borough Council
Claire Minter Parish Clerk, Salfords and Sidlow Parish Council

Gatwick Airport Northern Runway: Environmental Impact Assessment Scoping Report 2019

Horsham District Council's Response

EIA Scoping Response

1.0 Introduction

1.1 Horsham District Council is a statutory consultee to an application by Gatwick Airport Limited (GAL) for an Order granting Development Consent for the Gatwick Airport Northern Runway. This document sets out our response to The Planning Inspectorate (PINS) following the request from GAL for a Scoping Opinion. This Scoping Opinion, provided by PINS, will inform GAL of the information to be provided in an Environmental Statement (ES).

1.2 Under Section 43(3) of the Planning Act 2008, Horsham District Council is classified as a 'Neighbouring Authority' for the purposes of these proposals. We are in very close proximity to the airport, with the airport's boundary lying approximately 125m from the district's north eastern boundary. We believe that the proposed development has the potential to significantly affect the district's environment and its residents.

1.3 The Council's officers have welcomed the opportunity to attend a series of workshops, held by GAL, this year with details of Gatwick's Master Plan proposals. We would like to highlight, however, that there has been very limited opportunity and time allowed by GAL to fully understand the evidence base supporting the information in the submitted Scoping Report and this has therefore informed the nature of our response which is set out in the paragraphs below.

2.0 General Comments

2.1 The expansion plans that GAL has proposed through its Airport Master Plan under Scenarios 1 and 2 represent significant growth of the airport. In paragraph 1.3.3 GAL claim that the proposals under Scenario 2 will increase the capacity of the airport by approximately 13 million passengers per annum (mppa) thereby meeting the Government's prescribed criteria for a Nationally Significant Infrastructure Project (NSIP) of an additional 10 million passengers per year. The Council does not wish to dispute this claim, however, what is unclear, is why the growth under Scenario 1 is not also subject to a Development Consent Order? As detailed in the Gatwick Airport Master Plan, the passenger throughput in 2018/19 was 47.1 million passengers per annum (mppa) and GAL claim that by making best use of the existing runway, the capacity could grow by up to 13.9 mppa to 61 mppa by 2032. This represents a similar increase in passenger throughput, but it is unclear why this would not be subject to the same Development Consent Order process.

2.2 Horsham District Council is currently conducting a review of its Local Plan. Work is progressing on the emerging Horsham District Local Plan (2019-2036) and publication of the Regulation 18 consultation is scheduled for February and March 2020. Further detail on this process is set out in our response, but it is imperative that the emerging Local Plan documentation and potential strategic allocations should be fully considered during the Environmental Impact Assessment of this application for Development Consent.

EIA Scoping Response

- 2.3 The illustrative plans provided within the Scoping Report detail multiple options for the location of certain development and some of this development is significant in its own right (for example, the CARE facility, the wastewater treatment works plus new hotels and offices). This uncertainty over the location of development makes it difficult to provide a robust Scoping Opinion and Horsham District Council therefore reserves the right to challenge plans as they develop if sufficient consideration has not been given through the Environmental Impact Assessment process.
- 2.4 There is a need for clarity in the Baseline Data. It is unclear whether the growth that will take place under Scenario 1 will form the baseline for some elements of the various studies or whether existing conditions will be used. The Council seek clarity on this matter, particularly if the former is the case, as this would not give an accurate picture of the expansion proposals in their entirety. It is important from the outset that it is clear what the level of planned growth is, over what timescale and the development that is required to support that growth.
- 2.5 GAL is reporting that the housing implications of the proposed expansion are intended to be scoped out. This cannot be correct given the relationship between economic growth, jobs and population growth. Until this relationship has been fully assessed it is not possible to assume there is no impact. There is considerable uncertainty about the scale and location of future growth in the region beyond.
- 2.6 We strongly believe that statutory consultees from organisations including the Environment Agency, Natural England, Historic England, Highways England, amongst others, should be involved in the Topic Working Groups and Co-ordination Groups. The engagement with these key statutory consultees will ensure that the key issues can be identified and discussed at an early stage and ensure that these issues can be addressed at the earliest possible opportunity.

3.0 Historic Environment

- 3.1 The Council is satisfied that, overall, the Scoping Report describes an acceptable approach to the assessment of the impact on heritage assets. In paragraph 7.1.27 GAL refers to an area of 3km from the Project site boundary for the identification of designated heritage assets. This is an appropriate starting point and adding assets outside this zone is also considered to be appropriate. However, there is no figure representing this 3km area, only a figure representing the 1km archaeological area.
- 3.2 It would therefore be useful for GAL to provide a map at the earliest opportunity that shows the area 3km from the Project site boundary to confirm that all designated assets within this area have been identified. If this is not currently the case, these sites should be incorporated into the assessment process. It is also suggested that the impact on non-designated heritage assets be identified and considered. Although not of national importance these assets are of local significance and should be protected where possible.

EIA Scoping Response

4.0 Landscape, Townscape and Visual Resources

- 4.1 Regarding the proposed study area, it is stated that all visual receptors will be scoped out beyond the 5km radius shown on the Zone of Theoretical Visibility (ZTV) map. Although this, in principle, might be the right approach, the plan submitted does not show the areas beyond and it is therefore difficult, at this stage, to confirm whether there are any other relevant viewpoints the Council would want to see assessed.
- 4.2 At the current time, this Council is concerned that the impact of the proposals on the High Weald Area of Outstanding Natural Beauty has not been adequately addressed and would request that any impacts on this protected landscape are given direct consideration as part of the EIA process.
- 4.3 No reference has been made in the document to the biomass boiler stack within the Project key components. At this stage, it is not clear whether the 50m stack is considered as an input for the ZTV map? Given the height of this stack the landscape impacts from a structure of this height should be considered as part of the EIA process.
- 4.4 Paragraph 7.2.22 states that *“a separate study area will be established to coincide with overflying aircraft at height profiles up to 7,000 feet to address effects on landscape tranquillity and visual receptors”*. The Council agree with this approach and highlight that it will be important to consider these effects on walkers, equestrians and cyclists using the public rights of way network as well as any residents within this separate study area and within the wider landscape, beyond the protected landscapes alone.
- 4.5 In addition to Policies 25, 26, 27 and 30 of the Horsham District Planning Framework (2015), the applicant is further advised to consider ‘Policy 31: Green Infrastructure and Biodiversity’ as a relevant Policy in this assessment.
- 4.6 In reference to the Guidance Documents that will inform the assessments, the applicant is also advised to refer to the published guidance document [‘An Approach to Landscape Character Assessment’](#) (Christine Tudor, Natural England, October 2014).

5.0 Ecology and Nature Conservation

- 5.1 We have reviewed the submitted EIA Scoping Report (GAL, Sept 2019) particularly Volume 1, Chapter 7.3: Ecology and Nature Conservation (pages 73-81) as well as Chapter 7.6 Traffic and Transport, Chapter 7.7 Air Quality and Appendix 9.1.1 (Justification to support the scoping out of aspects and matters).
- 5.2 We are satisfied that the EIA Scoping Report has referred to the correct legislation and policy although it has omitted reference to Policy 31 of the Horsham District Planning Framework which should be considered. However, as potential impacts on the Sussex Bat SACs (Special Area of Conservation) have been scoped in for further assessment, reference should also be made to the draft [Sussex Bat SAC Planning and Landscape Scale Enhancement Protocol](#) (South Downs National Park Authority/Natural England, undated).

EIA Scoping Response

5.3 In relation to air quality impacts, we welcome reference in paragraph 7.7.2 to Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (Natural England, 2018). It is considered that cross reference to this assessment in relation to designated sites in section 7.3 would also be helpful. Although the ecology chapter refers to Natural England's MAGIC website, the applicant's ecologists need to use this resource to check the Impact Risk Zones for individual designated sites instead of a generic 5km buffer from the development.

Baseline Information:

5.4 We consider that identification of the initial Study Area for this EIA Scoping Report follows best practice. It may be that an additional area of study within Horsham District is needed to ensure likely ecological impacts are being fully considered but at present this needs to be refined in light of results from surveys undertaken. The final Study Area should be refined in relation to SACs designated for bats, should such mobile species be identified as present on the development site or where the airport operations model suggests that effects may occur even where these sites lie outside the initial 20 km and 5 km search areas. We note that the survey area will also include up to 500 metres both up and down stream of the major watercourses that flow through the Project site to identify any potential sign of otter/water vole. A similar survey area would be used for fish, should such surveys be required.

5.5 We note that the desk study for species records will include local record centres – this should include Sussex Biodiversity Record Centre (SxBRC) – and these records should inform survey requirements. Records from any new or updated surveys undertaken in Sussex should be shared back with SxBRC.

5.6 We also note that surveys to date have identified (para 7.3.18) populations of European Protected Species:

- GCN breeding in ponds in adjacent to Horley and Wood Ancient Woodland and to the north of the River Mole near to the Bear & Bunny Nursery;
- a Bat assemblage including Bechstein's bat roosting in Brockley Woods Ancient Woodland; and
- Dormice in the Ancient Woodland although the location(s) have not been identified.

5.7 As other protected species including badgers and reptiles such as grass snake have also been found within the Study Area, we expect the Preliminary Environmental Information Report (PEIR) to include details of mitigation, compensation and enhancements for all protected species. It is particularly recommended that the survey and assessment of badgers is provided in a separate confidential appendix to avoid release of sensitive information.

5.8 Although surveys for breeding birds have been undertaken, we recommend that these include ground nesting birds as some Priority species, for example, Skylark, may be affected by wildlife hazard safeguarding considerations.

5.9 We are pleased to see that surveys have recorded invasive plant species such as Himalayan balsam around the site and will expect appropriate control measures to be

EIA Scoping Response

included in the outline Code of Construction Practice (CoCP). This should include repeat checks for non-native invasive species in areas where construction is proposed.

Methodology:

- 5.10 We note that appropriate survey and assessment to date has been undertaken to assess the impacts of this development on biodiversity. We recommend that nationally agreed guidelines are followed for these and other surveys and all survey work should be undertaken in the appropriate season by appropriately qualified ecological consultants. Survey and assessment should meet the requirements of Natural England Standing Advice.
- 5.11 Surveys should include Priority habitats and both protected and Priority species. The assessment of likely ecological impacts needs to include sufficient mitigation measures to minimise the impacts as well as identify compensation for any residual impacts and biodiversity enhancements.
- 5.12 The GAL approach does not currently refer to management of any habitat created although this will also need to be included in a long term Landscape and Ecological Management Plan (LEMP) as a requirement of DCO consent. An outline version would be expected to be made available during the pre-application stage of the DCO to allow consideration of its effectiveness by local authorities.
- 5.13 We are satisfied that monitoring of the success of mitigation measures will be undertaken through the continuation of the surveys completed by the Gatwick Biodiversity Officer and that details will be described within the PEIR/Environmental Report chapter. The measures to be implemented through the Environmental Action Plan or LEMP should be secured by an appropriate requirement of DCO consent.
- 5.14 The above details will need to be submitted with the PEIR and outline LEMP to inform the Local Impact Report (LIR) to be prepared by the local authorities. It is recommended that Horsham District Council liaises with neighbouring authorities to discuss a joint LIR and eventually a Statement of Common Ground.

Potential Impacts:

- 5.15 As a pathway for impacts on the Sussex Bat SACs has been identified, we expect details of survey and assessment to be included in the Shadow HRA/Appropriate Assessment for consideration by Natural England as part of the DCO process.
- 5.16 We recommend that the PEIR contains details of air quality monitoring available on roads within 200m of N2k sites and SSSI woodland particularly those which are likely to generate increased traffic to the airport as a results on the development. This is particularly important for Ashdown Forest SAC and SPA and Mole Gap and Reigate escarpment SAC as these Habitats (European) sites are designated for nutrient poor heathland. Ashdown Forest supports important lichen assemblages and air pollution listed in Site Improvement Plan (SIP) which needs a Site Nitrogen Action Plan to control, reduce and ameliorate atmospheric nitrogen impacts. Mole Gap and Reigate escarpment SAC (which also has Bechstein`s bat as a designation feature) also has air pollution as

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an issue listed in the SIP. Further investigation of the impacts of nitrogen deposition is needed by monitoring the indicators of increased nitrogen (N) deposition, such as increased vigorous grass growth, increase in Tor-grass and other grasses, and a decrease in orchid species through the use of fixed point quadrat surveys over 5 years.

- 5.17 These habitats sites could therefore be adversely affected by changes in air quality resulting from the development so this needs to be covered by the shadow HRA/Appropriate Assessment. We welcome the reference to monitoring data from the Sussex Air Quality Partnership and recommend that the applicant seeks similar data from other partnerships where relevant. We note that surveys have covered those European Protected Species likely to be present within the Study Area and affected by the proposed development – great crested newt (GCN), dormouse and bats (roosting and foraging/commuting). We welcome the decision to scope in potential impacts on internationally and nationally designated sites as shown on Figures 7.3.1 and 7.3.2 in Volume 2 of the EIA report. However, we recommend that botanical survey consideration of habitats is related to SAC or SSSI designation features, such as species rich grassland which may be intolerant to nutrient deposition and species, such as lichens susceptible to air pollution. This also applies to Ancient Woodland which is recognised by the NPPF as an irreplaceable habitat and it is important to understand if any of these are sensitive to nutrient nitrogen and NO_x concentrations.
- 5.18 We welcome the statement that the PEIR will take full account of the potential presence of Bechstein's bat, surveys will include trapping and subsequent radio tracking to identify roosts and foraging/commuting routes around the development site. Collision risk surveys, using thermal imaging techniques, will be welcomed in order to assess the potential for increased bat strike risk as a result of increasing air traffic movements.
- 5.19 We note that 7.3.15 lists habitats of ecological interest however it will be necessary to identify any impacts on Priority habitats and species (and not just significant ones) in the Environmental Report to ensure that the Secretary of State can demonstrate their Section 40 duty under NERC Act 2006.
- 5.20 We have reviewed the proposed approach to ecological mitigation, monitoring and enhancement and consider it appropriate although it needs to include Priority habitats and species not just protected or notable ones. We welcome protection of habitats during construction activities from pollution/disturbance etc. and recommend that effective mitigation measures are embedded in the CoCP and secured as a requirement of the DCO. A draft should be submitted with the PEIR and outline Landscape and Ecological Management Plan.
- 5.21 Further mitigation, such as the provision of new commuting routes for bats or new foraging habitat for birds, may also need to be incorporated, based on the findings of the assessment as required, noting that any new habitat provided may be influenced by wildlife hazard safeguarding considerations.
- 5.22 Any potential significant effects, both direct and indirect, should be assessed and appropriate mitigation and compensation measures recommended to ensure these can

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be secured by a condition of any consent. This will allow the Secretary of State to discharge all associated statutory duties, including Section 40 NERC biodiversity duty.

5.23 We recommend that references to notable (which has a specific meaning relating to distribution of species) are refined and that the report needs to clearly identify Priority Habitats and Species. We note that the Scoping report uses the term “notable” for species, includes additional criteria, for example, Red Data Book. Clarification of this term is recommended as it does not reflect that term where it is used for distribution trends measured at 10 km square resolution, for example, Nationally **Notable** (Nationally Scarce or Nationally Rare). For some taxa this category has been further split into **Notable A** (Na) for species occurring in 16 to 30 10 x 10km squares and **Notable B** (Nb) for those occurring in 31 to 100 10 x 10km squares.

5.24 Outline documents, such as the Environmental Action Plan and CoCP to cover the construction period, would be welcomed and a separate long-term LEMP will need to be prepared to ensure the compensatory habitats become established and the impacts from the development can be effectively minimised. These are likely to be secured as a requirement of any Development Consent.

5.25 The Scoping Report refers to the preparation of a Technical Appendix: No Significant Effects Report or (if Appropriate Assessment is required following screening) as a Habitats Regulations Assessment Report. As PINS and the Secretary of State will need to prepare/adopt a HRA screening /Appropriate assessment, the applicant should provide shadow documents for consideration and possible adoption for formal consultation with Natural England. There needs to be in-combination assessment in tandem with the cumulative assessment for EIA to ensure that regulatory requirements are met.

5.26 To establish a consistent assessment approach, there is merit in the use of a Significance Matrix and standard terminology as the basis for assessment for each individual topic, where this is possible.

5.27 The Scoping report Para 7.3.46 only lists two ecological issues to be scoped out but Appendix 9.1.1 lists three:

1.” *Direct habitat loss effects within the boundary of designated sites (no habitat loss would occur within any of the identified designated sites, at European, national or local level). Therefore, no impact pathway would exist;”*

2. *“Effects of dust on, or changes in water quality at, European designated sites. The closest European site is Ashdown Forest SAC/SPA, located approximately 12 km to the south east of the Project site and no European designated sites are hydrologically linked to the project site. Therefore, no impact pathway would exist.”*

3. *“Effects on species absent from the study area or where there is no potential for significant effects to arise. If species are not present there is no impact pathway. All*

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receptors which have the potential to receive significant effects have been included in the assessment.”

5.28 Based on the desk study and the site surveys, the ecological effects proposed to be scoped out of the EIA process are considered appropriate as there is no impact pathway.

Opportunities:

5.29 We expect to see biodiversity enhancement opportunities embedded into the design of the scheme and recommend creating Priority habitats as well as measures for Protected and Priority species. The PEIR should thoroughly explore all reasonable options to deliver measurable net gain from the development and restore biodiversity networks.

5.30 In conclusion, we consider that the approach for survey and assessment undertaken is appropriate and mitigation measures will be confirmed to minimise significant effects from the development as defined by the EIA Regulations. Additional assessment is needed for likely impacts on designated sites particularly from air pollution and this could trigger the need for mitigation off-site along with long term monitoring.

5.31 In addition to the EIA report, it will be necessary to also provide sufficient information on non-significant impacts on Protected and Priority species and habitats at submission either in a non-EIA chapter or separate documentation. This is necessary in order that local authorities have certainty of all likely impacts, not just significant ones, with any mitigation and compensation measures needed to make the development acceptable, secured as a requirement of the Development Consent Order.

6.0 Geology and Ground Conditions

6.1 No comment.

7.0 Water Environment

7.1 No comment.

8.0 Traffic and Transport

8.1 The Council is very concerned that the extent of the transport model should be wider, particularly to include impacts on major urban areas (in particular along the south coast) and the impact on more localised transport infrastructure. The proposed restrictive area of the study is not acceptable, especially if, as GAL claims, the housing requirements arising from this proposal are not being considered as part of this application and is instead relying on the delivery of supporting housing to come through Local Plans that are being prepared. The impact of travel to and from the airport from staff, associated employment as well as passengers will be a key consideration. As highlighted to GAL in the Council's response to the Draft Airport Master Plan on 7th January 2019, there is significant reliance placed by GAL on the North-South corridor and the M23/A23 and not

EIA Scoping Response

enough consideration is given to the impacts on other major links including A roads within Horsham District. The assessment should also include impact on these roads, together with highway links, not just junctions.

- 8.2 We would urge GAL to consider more challenging modal shift targets, particularly in relation to parking. The impact of transport construction traffic is also omitted and needs to be considered as part of the assessment. It is noted at this stage of the proposals, the plans provided with the Scoping Report are illustrative and provide numerous options for the location of development. However, changing the location of development will change the impacts and this needs to be better considered with an appropriate supporting evidence base. In any EIA the worst case scenario should be considered.
- 8.3 The Council considers that there is too much reliance on the planned improvements across the transport network, such as the M23 Smart Motorway Project and the improvements to Gatwick Railway Station. These upgrades are required to create additional capacity in the transport network to accommodate **existing** requirements and do not take account of the additional burden that will be placed on the network even with these upgrades as a result of airport expansion. It is therefore imperative that sufficient studies are undertaken to understand these impacts and to enable the provision of suitable mitigation.
- 8.4 We would also like to request that Horsham District Council's Infrastructure Delivery Plan (2014 & 2016), or any updates which emerge through our Local Plan preparation process, are added to the list of relevant *Policy, Legislation and Guidance* documents to consider, particularly given that we think the scope of the transport assessment should incorporate the traffic impacts in Horsham district. We are also updating our Infrastructure Delivery Plan as part of the Council's Local Plan Review and we strongly suggest GAL takes this document into consideration as it emerges.

9.0 Air Quality

- 9.1 It is noted that the traffic and air quality modelling will be carried out for the years 2018 (baseline), 2026 (airfield's first full year of operation after opening), 2029 (interim assessment year when peak slots on the northern runway are likely to have been filled), 2038 (design year, with all airside and landside work completed). It is also noted that the first year of operation is based on the current expected opening date of Heathrow's third runway in 2026. However, in the event that the third runway cannot be delivered in 2026, the opening year of 2030 will be modelled. The Study should allow for consideration of new information which may emerge over this period, for example, improvements in road traffic emissions, but nevertheless consider that it will be important to consider the worst case scenario. The Council would also wish to see the distinction between airport-related and non-airport-related road traffic.
- 9.2 It is strongly recommended that the applicant has regard to the [Air Quality and Emissions Mitigation Guidance for Sussex \(2019\)](#) in assessing air quality impacts. The guidance takes a low-emissions strategies' approach to avoiding cumulative impacts of new development, by seeking to mitigate or offset emissions from the additional traffic. In accordance with the guidance, a damage cost calculation is required from all 'Major'

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developments. Applicants are required to submit a mitigation plan detailing proposed measures to mitigate and/or offset the impacts. The estimated value of the proposed measures should be equal to the environmental damage costs.

9.3 The Council is concerned as to the approach in Air Quality Modelling. The proposed Modelling will be using a 10 x 11 km grid, yet in previous studies (ARUP for Gatwick's response to the Airports Commission Air Quality Consultation in 2015) a 10 x 10 km grid has been used and historically a 10 x 8 km grid has been used. This makes comparison of the ratio of airport to non-airport car traffic emissions impossible. The data regarding emissions from road vehicles must separate out airport-related traffic from non-airport related traffic

9.4 With regards to the ecological receptors, it is expected that the impacts on Ancient Woodland areas will be assessed. The Council also expects that the impacts of additional traffic on town centres in Horsham District, including Horsham, Cowfold, Henfield and Storrington are included in the assessment as the increase in housing, associated employment as well as passenger numbers travelling to the airport is envisaged will have an impact on traffic flows and air quality in the district. In addition, we suggest the Study should include monitoring of ultrafine particles

9.5 There is an ongoing issue with unrealistic emission rates being used for diesel vehicles. The issue is more significant with modelling concentrations for future years. Therefore, a sensitivity analysis must be carried out when assessing future years. It is recommended that future year emissions are held constant (at the baseline level or an alternative agreed level) or that alternative emission rates are used for diesels, for example, the Air Quality Consultants 'Calculator Using Realistic Emissions for Diesels' (CURED) V3A

9.6 The proposal to scope out pollutants other than NO_x, NO₂, PM₁₀ and PM_{2.5} is not supported because it is not only road and air traffic that are relevant. The list should be expanded to include consideration of the emissions from the stack of the CARE energy-from-waste facility.

10.0 Noise and Vibration

Air Noise

10.1 The Council endorses the following response of Crawley Borough Council with regards to Noise and Vibration;

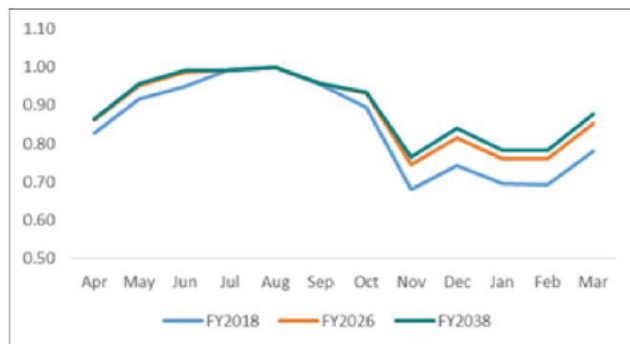
10.2 The main impacts of a dual runway operation on air noise are the increase in overflights of existing residents both in terms of total noise (L_{Aeq}) and the increase in the number of events. Also communities within 6-7km from the end of the runways and to the north of the existing departure route will be 210m closer to departing aircraft. It is therefore important to quantify the impacts of these two main issues.

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10.3 It is generally accepted that there is no single metric that can evaluate the impact of aviation noise. Acoustically, an old Boeing 747-100 is roughly equivalent to 128 Airbus 320-NEOs as it is about 20dB louder on departure. Given the choice, some residents would prefer one single B747-100 to 128 A320 NEOs as the noise is over and done with in one go. However further from the airfield at night residents may prefer quieter NEOs which will not wake them up to one noisier aircraft which might.

10.4 To measure the total noise the Scoping Report recommends using the summer 2018 noise contours ($L_{Aeq,16hr}$ & $L_{Aeq,8hr}$) as the baseline and then compare this to the summer contours for future seasons. The summer contours are based on 92 days during the summer season as this is traditionally the noisiest period. However, Gatwick is at near capacity during this season on a single runway operation and any future growth on a single runway operation will be achieved by 'peak spreading', namely outside the busiest periods (see diagram 4.5.1 below). This is also likely to be the case for the dual-runway operation, where growth will be in both the busiest summer period which will be captured by the 92-day summer contours but again to achieve the predicted growth figures 'peak spreading' will be required which will be outside the summer period and therefore not captured by the summer contours.

Diagram 4.5.1: ATMs per Month



10.5 Therefore sole use of the summer contours will not capture the full impact of 'peak spreading' and the total noise. It is therefore necessary to produce L_{den} and L_{night} contours (see The Environmental Noise (England) Regulations 2006) as well as the summer contours as they have the advantage of including all the flights from the whole year. The 'DEN' stands for Day, Evening & Night and covers the whole year and hence the increased flights outside the summer period. The Evening and Night periods attract a 'weighting' of +5 & +10dB respectfully to reflect the relative impact they have on people in relation to the Day noise (10dB increase is roughly equivalent to a doubling of loudness). *N.B. Gatwick are required by The Environmental Noise (England) Regulations 2006 to produce L_{den} and L_{night} contours for their Noise Action Plans every 5 years, the last one was published in 2019 using 2016 L_{den} contours.*

10.6 The Environmental Noise (England) Regulations 2006 recommends L_{den} contours of 55dB or above and L_{night} contours of 50dB or above. However, since 2006 there has been new research which was published by the World Health Organisation (Environmental Noise Guidelines for the European Region (2018)) which recommends adverse effects from aircraft noise can begin as L_{den} 45dB and L_{night} of 40dB. It is

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therefore recommended to correctly identify the full impact of noise from dual-runway use that the L_{den} and L_{night} contours start at 45dB and 40dB.

- 10.7 If permission is granted for the second runway then the predicted L_{den} and L_{night} contours will also act as a comparison for future Noise Actions Plans to be benchmarked against.
- 10.8 The other aspect of overflight is the number of events. These are best measured using number-above contours (N65 day & N60 night) and I agree with Gatwick's use of these contours. When preparing these contours all aircraft over the respective decibel level should be included regardless of altitude (i.e. the 7000' 'cap' in CAP1498).
- 10.9 The use of the northern runway will bring departures 210m closer to existing communities on the north side of the airport. It is proposed to only use Code C aircraft on that runway. To assess the impact on this type of aircraft on these communities a noise footprint of the departure of such an aircraft would be required. I would recommend a 60dB and 65dB contour (related to the N-above) for both standard aircraft and the new NEO/max from both main and northern runway and for both east and west departures.
- 10.10 It is proposed to maintain the existing Noise Preferential Routes (NPRs) for departing aircraft. With aircraft movements proposed to increase up to 70 movements per hour. There is no indication in the Scoping Report whether the departure routes can comfortably manage this flow, especially during periods when departures dominate (namely early morning with the surge of short haul low cost departures). With the expansion of the long-haul market at Gatwick there will be an increase of wide-bodied aircraft which require greater spacing from smaller aircraft so reducing the movements per hour. Some data on spacing and departure/arrival rates is required, especially when the whole of the Airspace is being redesigned through the Future Airspace Strategy Implementation programme for the South of England - or FASI(S) as it is more commonly referred to - and there is the potential for new departure routes.
- 10.11 At present it is not known what the conclusions of FASI(S) will be, however, if permission is granted for the upgrading of the standby runway then between that permission and the beginning of operation the results of FASI(S) will be published. If permission is granted for a twin runway operation then FASI(S) will have to take that into account. This fact may well influence the need for new departure routes to reduce potential congestion on a dual runway single departure route for a dual runway operation, especially on Routes 3 or 4. However, GAL is likely to argue that it would require a full Airspace Change Consultation (CAP1616). Since permission would have already been granted for a second runway the 'safety/efficiency' argument can be used to much greater effect. It is therefore very important to understand that by 2038 with no airspace changes that Gatwick can operate at up to 70 movements per hour without risk to safety or efficiency.
- 10.12 'Go-arounds' (aborted landings) have steadily increased in number and in percentage terms since 2012. In the first quarter of 2019 there were 179 go-arounds and only 31 (17%) were due to another aircraft either being slow-to-roll or slow-to-vacate the runway. It is therefore clear that if the number of arrivals increase then the number of go-

EIA Scoping Response

arounds will increase at least proportionally or as the recent trend shows, disproportionately. This point needs to be examined in further detail as go-arounds can be very disturbing for residents and can cause a higher than normal level of anxiety due to the low altitude and displaced location of the aircraft.

Ground Noise

- 10.13 A ground noise report was produced by GAL in 2016 but was never published (despite being referenced in planning application CR/2017/0116/FUL). This report needs to be published as a part of the DCO application.
- 10.14 Air noise is 'transportation' noise and includes all noise from aircraft from 'start of roll' to leaving the taxiway upon landing. All other noise is counted as 'ground' noise. Ground noise is 'commercial or industrial' noise and should therefore be assessed in the similar manner as all other commercial or industrial noise using BS4142:2014. The standards used in BS8233 relate to anonymous or steady noise which would include the 'hum' caused by Gatwick but not individual distinguishable events which will cause a greater level of annoyance. This would include (but not exclusively) engine testing and taxiing aircraft close to a receptor.
- 10.15 The Gatwick 'hum' in any particular location varies according to wind direction. It would therefore be appropriate to measure the background (L90) noise levels in upwind conditions to ensure a true background noise level. The ground noise propagation should then be calculated using a positive downwind scenario.
- 10.16 The 'end-around' taxiways and the new Juliet holding spur need to be examined in detail as these both bring taxiing aircraft closer to existing residents. The use of bunds has been mentioned but full calculations and assumptions would need to be published to demonstrate their effectiveness.
- 10.17 The increase of aircraft using Gatwick will result in an increase in maintenance and ground runs. The location for future ground runs needs to be agreed and the impact calculated when compared to the present locations and frequency.

Road Traffic Noise

- 10.18 There has already been an increase in road traffic 'spillage' from the main highways to the side roads and country lanes. Even though the total noise will not be comparable to the main roads, the increase in noise can be large and proportionally more disturbing due its close proximity to residents and due to the fact it is made up by multiple 'events' rather than a general hum. Therefore an assessment should be made of traffic flows on local roads and how this traffic is associated with Gatwick and how it can be mitigated.

Mitigation

- 10.19 The use of sound insulation to mitigate noise is a last resort and needs to include the windows, doors and the roof, which is often the weak spot in a house. In addition, sound insulation is only effective when the windows are closed. During summer months windows have to be kept open to effectively deal with the effects of summer overheating. Opening the windows exposes residents to the harmful effects of noise, therefore to truly

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mitigate against the harmful effects of noise, additional forms of ventilation are required. Natural forms of ventilation like acoustic louvres are more sustainable and visually acceptable. They are however less effective with very high noise levels at which point mechanical ventilation will be required. Any mitigation scheme will be expected to offer all of these options.

Construction Noise:

10.20 It is expected that there will be a lot of night time working creating noise during the only period of relative quiet that the nearest residents will have. It is expected that this additional burden placed on these residents will be considered in detail and all forms of potential mitigation explored and applied. If noise levels are very high or during periods of very hot weather where windows have to be opened for ventilation, then alternative temporary accommodation should be available.

10.21 It is accepted that residents will experience limited vibration from the construction works on site but the off-site construction work on the road network is much closer to residents and needs to be assessed.

11.0 Climate Change and Carbon

11.1 In relation to the Assessment of Significance, the meaning of paragraph 7.9.68 requires clarification. The paragraph refers to a 'qualified effect' to be compared against a national carbon budget. In accordance with the recommendations of IEMA guidance 2017, it is expected that the Project's carbon budget should be quantified and compared against an existing carbon budget. Will the fourth and fifth carbon budgets be used for that purpose? Are there regional or local budgets that can also be used?

11.2 Regarding mitigation, we look forward to reviewing the GHG emission mitigation/offsetting plan and acknowledge that the measures will be developed in dialogue with the design teams, environmental specialists and stakeholders.

12.0 Socio-Economic Effects

Wider Socio-Economic Considerations

12.1 It is recognised that the expansion of the airport will lead to the creation of additional jobs both on and off the airport. It should be noted that any airport expansion will take place in a region of the UK which has very low unemployment rates and therefore these jobs will likely require the migration of employees to the area to fulfil these additional roles. This, in turn, will create additional pressure for housing in a geographical region that is already suffering severe housing stress and the effects of high house prices.

12.2 Additional housing also leads to a greater requirement to provide the supporting social infrastructure, such as education and health facilities. The references to the number of jobs that will be created as a result of expansion appears to be inconsistent between the details that featured in the Gatwick Airport Master Plan and the later content shared during the Topic Working Groups. It was set out in the Airport Master

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Plan document that 20,000 jobs would be created, although in the Scoping Report, the level of employment created as a result of airport expansion seems to have been downplayed. Given this scale of potential employment set out in the Gatwick Airport Master Plan, it is imperative that the impact on the delivery of employment on and off-site remains in scope.

12.3 It is considered that the impact on businesses links to the work on the housing assessment, for example, if there is a positive impact for businesses, where expansion is supported by the increased economic activity – the impact on businesses could be negative in terms of problems of recruitment. Paragraph 7.10.7 highlights that the existing baseline data indicates that more jobs locally to the airport are of lower skill levels. It is understood that the Project will create approximately 3,000 additional jobs, however, GAL suggest that these will be on-airport and mostly lower skill level employment. An increased requirement for lower skill level jobs at the airport causes knock-on impacts for existing businesses in the local area. These additional pressures must be fully understood and where appropriate, suitable mitigation should be required. There should be some reference to the impact in the section on “Effects proposed to be assessed”.

12.4 It is understood that the direct economic impact will be for additional employment land to meet the operational needs of the airport, however it is also reasonable to assume that an expanded airport with this level of investment, will be increasingly attractive to new businesses. It may be difficult to quantify but there should be some explicit reference to the improved offer in the area and that the degree of economic growth and additional jobs is not just airport related.

12.5 A further significant concern for the Council is the placing of population out of scope. This seems entirely based on the rationale that as GAL is not proposing residential development there will be a negligible impact on the population. Whilst GAL has verbally referred to a Housing Implications Assessment at a recent meeting with local authority officers, it does not appear that there is any reference to this Assessment in the Scoping Report. The Assessment may ultimately support GAL’s contention that the impact is minimal but at this stage the effects on population must remain in scope. The effects of the project on the population during the construction and operational phases must be scoped in to the assessment as it is wholly inappropriate to scope them out without further evidence of the potential requirement for housing in the region as a result of expansion.

Local Planning Context

12.6 The need to consider the impact on the surrounding population is particularly important given that the districts and boroughs in close proximity to Gatwick Airport are expected to deliver increased housing development as part of their local plans. These numbers are set through the Standard Method calculation. There is therefore a requirement that Horsham District alone will be required to identify land to deliver 974 homes each year as part of the next Local Plan. The district is also engaging with surrounding authorities including Crawley Borough in relation to the extent we may also be able to accommodate housing requirements that cannot be met within the administrative boundary of Crawley Borough Council. The level of housing which is allocated in our plan is therefore likely to be higher than the 974 dwellings per annum.

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- 12.7 Although the precise locations for these developments have not been identified, a number of strategic sites have been promoted for consideration as future development locations. The EIA Regulations in Schedule 4(5) state that the cumulative effects that could occur as a result of the Project “*in combination with other existing and / or approved projects*”. This should therefore include the housing numbers identified above, and should in addition consider the impact on the key strategic locations which have been promoted to Horsham District Council, but at this stage we would draw your attention in particular to the West of Ifield development being promoted by Homes England. This is because the scale of this potential project, 10,000 homes, and its very close proximity with the airport.
- 12.8 In addition to the information set out above, it should be noted that the Horsham District Local Plan Review will also include updates to the Council’s Infrastructure Delivery Plan, Economic Growth Assessment and Strategic Housing Market Assessment and these updated documents should all be taken into consideration to inform the studies once they have been finalised. The Council’s [Local Development Scheme](#) provides a useful timetable for the development and adoption of the emerging Horsham District Local Plan (2019-2036).

Study Area

- 12.9 The definition of the local study area is presented as a fait accompli. There is nothing which explains how the boundary has been fixed. It does seem quite a narrow definition, particularly as the study area in terms of impact on residents seems to be confined to the local study area.

Mitigation and Impact on Property Values

- 12.10 GAL has stated in paragraph 7.10.22 that specific mitigation and enhancement measures for the different socio-economic effects that could be introduced by the Project have not been identified at this stage of the EIA process but potential mitigation strategies could include measures to support community assets through planning contributions, provision of apprenticeships and training opportunities during construction phase and compensation measures for business and residents adversely affected by the Project.
- 12.11 However, the Council considers that these measures do not go far enough and do not spread the benefits of expansion more equitably amongst the communities that will be affected by the proposals. Whilst it is acknowledged that GAL has not stated its full intention at this stage of the EIA process, the Council considers that the mitigation measures proposed to address the socio-economic impacts in this document are too narrow. Whilst the potential for apprenticeships and training opportunities during the construction phase are welcomed, the Council would wish to see a stronger commitment to providing more long-term career development opportunities for the local community. The EIA, therefore, needs to incorporate wider research into the economic and employment potential that expansion of the airport could create.
- 12.12 GAL has also proposed that there could be compensation measures for businesses and residents adversely affected by the Project. This is considered to be vague; would the measures be restricted to compensation for those adversely affected during the construction phase of the Project, or the operational phase when residents affected by

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airport operations are likely to see an intensification of overflying, for example? In paragraph 7.10.24, where it states that the impact of the Project on property values would be scoped out, this seems to suggest that the longer term socio-economic impacts will not be mitigated and GAL is only considering mitigating the shorter term impacts of the construction phase.

12.13 The Council do not agree that it is appropriate to scope out the impact on property values. Whilst it is acknowledged that there are multiple drivers that can affect property values, it is not considered appropriate to scope this out of the Environmental Impact Assessment at this stage. Economic and political factors do have an impact on property values, but these are often complex and not directly attributable to one particular factor. As detailed in Gatwick's Master Plan, the proposals would lead to an increase of 10-15 air traffic movements in the peak hours. For the residents that are overflowed currently this is considered a significant increase and directly attributable to the expansion of the airport. It is not considered sufficient to dismiss this form of mitigation without further robust evidence and the Council strongly recommends that this issue should be scoped in to the assessment.

13.0 Health and Wellbeing

13.1 Whilst Horsham District Council supports the scope of the health and wellbeing assessment in terms of the activities associated with the expansion, we would request that the geographical boundary for the collection of the proposed baseline data be extended to include Horsham District. The transient nature of noise, air, water and vehicle movements means that residents living within the Horsham district, and particularly close to the administrative boundary with Crawley Borough Council will be affected by the influence of construction and operational activities given the proximity of our boundary to the airport. It is therefore important that the health and wellbeing of the district's residents is monitored and included in plans to mitigate any risks.

14.0 Agricultural Land Use and Recreation

14.1 No comment.

15.0 Waste

15.1 No comment.

16.0 Major Accidents and Disasters

16.1 Given that there will be increased aircraft movement both on the ground (and in some cases across a live runway) and in the air, it is assumed that there is potential for an increase in the risk of a collision.

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16.2 This change in risk (once re-assessed) would mean that the Airport's emergency response plans and procedures will need to be reviewed and evaluated to reflect this before the Northern runway is brought into full time use. As the potential expansion of the airport is so significant from its current 47.1million annual passenger throughput to 74 million by 2038, we do not believe that it is appropriate to scope out a number of Major Accident and Disaster scenarios, including, amongst others, transport accidents, malicious attacks, drones/laser incidents and terrorism, particularly given the drone incident in late 2018 which caused significant disruption. Disruption at the airport can lead to significant disruption on the wider transport network and these impacts need to be fully understood.

17.0 Cumulative Effects and Inter-relationships

17.1 GAL states that Local Development Plan allocations up to 8km from the Project site boundary will be screened in, but less weight will be given to emerging plans. The Council considers that this approach is insufficient.

17.2 The Government has acknowledged that there is a housing crisis in the UK and has announced a commitment to deliver 300,000 dwellings per year and it as has already been set out in this response, has created the Standard Method for assessing local housing need. This Methodology is used by local authorities to calculate the minimum number of homes expected to be planned for in their local areas. There is therefore an expectation that these houses must be planned for and delivered and whilst the precise location may not yet be known there is an expectation that they will come forward

17.3 Local authorities are expected to review their local plans every five years. Horsham District Council is currently conducting a Local Plan Review and we anticipate the publication of our Regulation 18 (Early Consultation) document in February and March 2020. Given the new minimum annual housing need figure plus any duty to co-operate to help meet neighbouring authorities' housing needs, the Council will be required to plan for a significant number of new homes every year. Our own housing need figure is calculated at 974 homes and the Council is in discussion with Crawley Borough Council and other adjoining authorities as regards the extent to which we can accommodate additional housing numbers to meet the needs from these authority areas.

17.4 Our timetable for Local Plan production will set out a Preferred Strategy in February / March 2020 and progress to the Proposed Submission (Regulation 19) consultation in September 2020 with formal examination in early 2021. It is noted that GAL has expressed its desire to be consulted as part of the plan preparation process, but it is considered that this should be a two way dialogue in order to be most constructive. It is therefore very important that GAL takes into account planned growth in current local plans, but also future growth, details of which will emerge as our new Local Plan progresses through the plan making process. The cumulative impact of future housing growth and airport expansion, including the associated impact on infrastructure provision, should be fully considered and not given less weight.

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17.5 In addition, the search radius of 8km is not considered to be a wide enough search area. As part of the Council's 'Call for Sites' which is a process to identify land that is being promoted to the Council for development, we have received around 500 submissions from site promoters. This includes a number of strategic scale sites that could deliver between 4,000 and 7,000 new homes plus large-scale employment provision. Whilst at the time of writing this response, we are at an early stage of the Local Plan Review and we do not know which sites will come forward, we do not think such large-scale development should be excluded from the Study. Given the potential cumulative impacts of such large scale development and airport expansion on local and regional infrastructure, we fully consider that this search area should be widened to correspond with the Labour Market Area identified in paragraph 7.10.5.

Third Runway at Heathrow

17.6 GAL has acknowledged the impact that the opening of the anticipated third runway at Heathrow Airport could have on the passenger and cargo throughput at the airport. GAL has modelled a number of options with the opening date of Heathrow's third runway in 2026 through to a final date of 2030. However, the Council do not consider that this adequately represents all the potential scenarios in relation to Heathrow's expansion proposals. Currently, the worst-case scenario in GAL's assessment would be for Heathrow's third runway to become operational in the later design year of 2030. However, a potential worst-case scenario should include the third runway not opening at all. Whilst we acknowledge that a third runway at Heathrow Airport has national policy support and Heathrow Airport Ltd has commenced the preparation of an application for Development Consent, this is by no means a guarantee. Therefore, to ensure a robust assessment of all the potential scenarios, we request that the modelling assumptions are expanded to include this alternative scenario.

Airport Expansion across the South of England

17.7 GAL's intention to develop the capacity of Gatwick by making best use of existing runways accords with the Government's support for airports to make more intensive use of their existing infrastructure and was a principle reinforced in the Government policy paper [Beyond the horizon: Making best use of existing runways](#) published on 5th June 2018. GAL has published an intended timeline for the submission of a DCO application in 2020 with the standby runway brought into regular use by the mid-2020s. Heathrow Airport Limited is also actively preparing for the submission of a DCO for its third runway. The intention of both airports is to bring forward proposals for expansion through the DCO process along broadly parallel timescales and this raises concern. Further to this, other important airports, such as Stanstead and Luton are also pursuing airport expansion through making best use of their existing runways.

17.8 Whilst it is accepted that proposals to increase capacity and achieve operational efficiencies by making more intensive use of existing airport infrastructure is aligned to the mandate from the Government for all airports to make best use of the existing runways, the Council is concerned that each set of expansion plans is being progressed with little reference to the cumulative impacts of airport expansion across the South East.

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- 17.9 Whilst the Council welcomes the economic benefits expansion of airports in the South East could create, there will undoubtedly be a significant impact on communities such as those in our district, given the cumulative level of expansion that is proposed. Undoubtedly, the scale of expansion of air traffic proposed will have cumulative impacts on our district which need to be more fully considered and understood once more technical work to support the expansion proposals become available.
- 17.10 The Council understands that airspace modernisation is part of a much wider programme of airspace change in the Southern region and is being brought forward under the FASI(S) programme. The Council also understands that Heathrow is engaging with other airports in the region, including Gatwick, to work together to contribute towards the effective delivery of new air traffic route structures.
- 17.11 Whilst the Council understands there is already some collaboration between airports in the Southern region in terms of airspace re-design, it is of concern that Heathrow and Gatwick are progressing plans to significantly expand capacity at the respective airports with little understanding at this stage, of the wider cumulative impacts 'on the ground' in the South East region. We are particularly concerned, for example, regarding surface access and the increased strain on road and rail travel as a result of cumulative expansion. Equally, we are concerned at the potential additional requirements for future housing growth in the area and further built development to accommodate growth in air freight, mindful of the current environmental constraints and the potential worsening of air quality in the South East.
- 17.12 The Council recommends that the cumulative impacts the scale of growth anticipated for each airport could have on the wider South East region forms part of the assessment.
- 17.13 The Government recognises the importance of the aviation industry to the UK and its economy and acknowledges that airports in London and the South East are nearly full. The Government has highlighted the scale of expansion required to meet growth in passenger numbers, with a projected increase of over 53% in passenger numbers in the UK by 2050.
- 17.14 Expansion on the scale that has been proposed by the Government cannot be undertaken in isolation and the Council considers that a deeper understanding of these cumulative impacts should be scoped in to this assessment.

18.0 Airspace Change Process

- 18.1 The Council acknowledges that the timing of the airspace change process under FASI(S) will mean that any updated flightpaths would not be available within the timeframe of the EIA process for the Project, however, airspace change should be scoped in to each topic area as further details become available.

CEMHD Policy - Land Use Planning
NSIP Consultations
Building 1.2, Redgrave Court
Merton Road, Bootle
Merseyside, L20 7HS

Your ref: TRO20005
Our ref: 4.2.1.6642

HSE email: NSIP.applications@hse.gov.uk

FAO Richard Kent
The Planning Inspectorate
Temple Quay House
Temple Quay,
Bristol
BS1 6PN

Dear Richard

30 September 2019

**PROPOSED GATWICK AIRPORT NORTHERN RUNWAY (the project)
PROPOSAL BY EP UK Investments Limited (the applicant)
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (as amended) – Regulations 10 and 11**

Thank you for your letter of 3rd September 2019 regarding the information to be provided in an environmental statement relating to the above project. HSE does not comment on EIA Scoping Reports but the following information is likely to be useful to the applicant.

HSE's land use planning advice

Will the proposed development fall within any of HSE's consultation distances?

According to HSE's records there are two major accident hazard sites within the indicated project scoping boundary of the proposed Gatwick Airport Northern Runway for this nationally significant infrastructure project. This is based on the current configuration as illustrated in, for example, figure 1.2.1 (site location plan) of the Environmental Impact Assessment Scoping Report Volume 2: Figures.

The two major accident hazard sites are:

- 1) HSE ref H3692; Gatwick Airport Storage & Hydrant Co Ltd operated by Shell UK Oil Products Ltd, and;
- 2) HSE ref H3694; Esso Petroleum Co Ltd, Perimeter Rd North, Gatwick Airport operated by Esso.

HSE's Land Use Planning advice would be dependent on the location of areas where public may be present. When we are consulted by the Applicant with further information, under Section 42 of the Planning Act 2008, we can provide full advice.

Hazardous Substance Consent

The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) will probably require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended.

The substances, alone or when aggregated with others for which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) Regulations 2015 as amended.

HSC would be required to store or use any of the Named Hazardous Substances or Categories of Substances at or above the Controlled Quantities set out in Schedule 1 of these Regulations.

Further information on HSC should be sought from the relevant Hazardous Substances Authority.

Consideration of risk assessments

Regulation 5(4) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the assessment of significant effects to include, where relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. HSE's role on NSIPs is summarised in the following Advice Note 11 An Annex on the Planning Inspectorate's website - [Annex G – The Health and Safety Executive](#). This document includes consideration of risk assessments on page 3.

Explosives sites

HSE has no comment to make in this regard, as there are no licensed explosive sites in the vicinity.


Electrical Safety

No comment, from a planning perspective.

Please send any further electronic communication on this project directly to the HSE's designated e-mail account for NSIP applications. Alternatively, any hard copy correspondence should be sent to:

Mr Dave Adams (MHPD)
NSIP Consultations
1.2 Redgrave Court
Merton Road
Bootle, Merseyside
L20 7HS

Yours sincerely,



Dave Adams
CEMHD4 Policy



Growth, Environment & Transport

Richard Kent
Senior EIA and Land Rights Advisor
Major Casework Directorate
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Kent
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Phone: 03000 415981
Ask for: Barbara Cooper
Email: Barbara.Cooper@kent.gov.uk

BY EMAIL ONLY

1 October 2019

Dear Mr Kent

Re: Application by Gatwick Airport Limited (GAL) (the Applicant) for an Order granting Development Consent for the Gatwick Airport Northern Runway (the Proposed Development) - EIA Scoping Notification and Consultation

Thank you for your letter dated 3 September 2019 providing Kent County Council (KCC) with the opportunity to submit comments to the Secretary of State regarding the information required within the Environmental Statement relating to the proposed Gatwick Airport Northern Runway.

Due to the location of the Airport, close to the Boroughs of Sevenoaks, Tonbridge and Malling, and Tunbridge Wells, proposals at the site could have an impact within Kent and therefore it is vital that KCC is involved in the Development Consent Order process.

KCC is firmly opposed to a second runway at Gatwick Airport. Routine use of Gatwick's northern emergency runway, albeit it for departures of smaller aircraft only, would result in a significant increase in aircraft movements and would offer no opportunity for respite from runway alternation. Moreover, in order to facilitate routine departures from the northern emergency runway additional aircraft will still be required to land on the main runway. This will inevitably lead to further intensification of usage of the main runway above and beyond the predicted increase in its own traffic. The noise impacts on West Kent from Gatwick's current single runway configuration are already unacceptable, and a potential increase of these impacts is likely to be intolerable.

KCC has reviewed the Scoping Report (September 2019) and for ease of reference, provides a commentary structured under the chapter headings used in the report.

Chapter 7 – Proposed Scope of Assessment

7.1 Historic Environment

An initial Heritage Assessment has been undertaken; based primarily on readily available resources held by the KCC Historic Environment Record. Rather than a detailed appraisal, it provides a broad initial view on the sensitivity of the historic environment resource in Kent and the way in which this should be approached for assessment of the potential impacts of development at Gatwick. The sensitivity of particular sites may change following more detailed appraisal and in light of new information. The process of assessment should be reviewed and refined as the consideration of the proposed development progresses.

Designated Heritage Assets within the study zone

Scheduled Monuments: There are approximately fourteen Scheduled Monuments in the Kent area of the study zone.

Historic England Registered parkland: there are approximately twenty historic parks within the Kent area of the study zone. The historic residences and parkland of Chartwell, Westerham, Hever Castle and Chiddingstone Castle are in closest proximity to the Airport.

Listed Buildings: There are approximately 1,905 Listed historic buildings within the Kent area of the study zone. Clusters of listed buildings of particular historic importance are associated with the large estates at Chartwell and Chiddingstone and there is a wide range of isolated historic buildings. Notably a concentration of historic buildings runs along the A25, leading through historic towns of Westerham, Brasted and Sundridge and along the A264, which leads out of Tunbridge Wells and through Speldhurst and Ashurst.

Non-designated heritage assets within the study zone

Within the Kent area of the study zone, there are also Conservation Areas, locally listed historic parks and gardens, landscape characterisation types and archaeological sites.

There are few known early prehistoric archaeological sites in this study zone area, partly due to the limited nature of formal archaeological investigations, but there are indications of Mesolithic activity around Tunbridge Wells and Bronze Age activity close to Sevenoaks.

There is high potential for medieval and post medieval archaeology within the Kent area of the study zone, as well as high numbers of historic agricultural and small industrial buildings and structures. Estates such as Squerryes Court and Chartwell, which comprise a complex grouping of historic buildings, are set within the part natural and part designer landscapes. Many of these historic sites are highly visible and extensive and there is high potential for associated archaeological remains to survive below the current surface.

The rivers within the study zone in Kent were probably historically targeted for military defence systems. Fort Halstead, within the northern part of the main study area, is clearly a historically used fortification site. Therefore, there is also potential for later post medieval and modern military and industrial archaeology in this area.

Potential Impacts

Archaeology: The proposal is unlikely to have direct impact on Kent's archaeological remains. However, there may also be a more indirect impact from enabling or related works, such as improvements to infrastructure - especially improvements to the M25, A25, A21 or A264, or improvements to services, such as upgrading water, electricity, gas or telecommunication routes. These indirect impacts should be identified and considered within the Environment Statement (ES).

There may be impact from additional overhead planes on the setting of some archaeological sites, such as Squerries Park Hillfort, in terms of appreciation and understanding of their site and situation.

Historic Buildings: The increase in flight numbers arising as a result of the proposal is likely to result in an increase in pollution from the aircraft, as well as the increased traffic travelling to the airport – this may have a direct impact on the designated and non-designated buildings in Kent. The proposal may have an impact on historic buildings within the high status residences, including Squerries Court, Chiddingstone and Chartwell. The historic buildings within the villages along the A25, such as Westerham and Brasted, and along the A264, such as Ashurst, could also be affected.

Furthermore, indirect impacts could result in a detrimental effect on the setting of the more isolated but high status historic buildings, especially in terms of the understanding and appreciation of medieval and post medieval components of buildings within Kent.

Historic Landscapes: The historic landscapes within the study zone in Kent could be directly affected by the increase in overhead planes and indirectly by increased road traffic. The increase in flights and resulting noise arising from the proposal would be intrusive and would have a detrimental impact on the appreciation, understanding and enjoyment on the extensive designated parklands - some of which are major visitor attractions in Kent.

The wider historic landscapes of this study zone are a key part of the historic character of Kent and the tranquillity of the historic areas are valued by residents and visitors. There might also be a detrimental visual impact on the views from and towards the historic parklands located on the hills, particularly towards the northern part of the study zone in Kent.

Overall impact on Historic Environment

Although there may only be a localised direct impact on the archaeology, historic buildings and historic landscapes from works associated with the proposal, there may be a considerable range of indirect impacts from the increase in air traffic and the need to improve surface access for the airport. This could range from direct detrimental impact on the fabric of historic buildings through increased air pollution, to the impact of the appreciation of the tranquillity of surviving medieval landscapes. Assessment of the environmental impact of the proposal needs to be supported by a thorough and robust

assessment of the historic environment and a specialist assessment of archaeology and historic buildings and historic landscapes should be part of the ES.

The ES for this scheme will need to include key local planning policies on heritage of Tunbridge Wells Borough Council, Sevenoaks District Council and Tonbridge and Malling Borough Council. It is essential that the historic environment for these districts and boroughs is considered, particularly in view of the potential impact from noise, pollution and traffic impacts.

Assessment of the historic environment as part of the ES will need to include appropriate assessment of historic/archaeological landscapes, not just Historic Landscape Character. At present, guidance set out by the Highways Agency could be the best current national model to follow. This is particularly important to ensure robust assessment of designated heritage assets and their significance. In Kent, the impact from noise, pollution, lighting and visible planes is going to be a significant issue moving forward due to the potential impact on all aspects of west Kent's environment.

7.6 Traffic and Transport

The County Council as Local Highway Authority notes the continuing investment in infrastructure local to Gatwick, including the upgrade of the M23 between junctions 8 and 10 to Smart Motorway standard. KCC also notes the planned improvements to Gatwick Station, which are to be in place prior to the proposed expansion and the investigation into significant improvements to the north and south terminal access junctions.

The approach set out for the Transport Assessment and traffic and transport modelling appears to be in accordance with guidance and best practice.

Whilst the traffic model network has not yet been set out, it is anticipated that it will need to include the following routes within Kent: M25, M26/ M20, A21, A264 towards Tunbridge Wells and beyond and A25 through Westerham and Sundridge towards Sevenoaks and beyond.

In relation to future trip generation, KCC has responded to Gatwick's consultants' investigations of the Sevenoaks Local Plan sites. The Local Plan is currently being considered at the Local Plan Examination. Consideration should also be given to proposed significant development sites in Tunbridge Wells and again in Tonbridge and Malling. The Tonbridge and Malling Local Plan has been submitted to the Secretary of State and the Tunbridge Wells Local Plan Regulation 18 Draft Local Plan is currently out for consultation. A Saturn transport model has recently been completed for Tunbridge Wells.

Sensitivity testing should consider the impact on other routes when strategic routes are disrupted by congestion and incidents. This is particularly an issue for communities on the A25, which is significantly impacted when there are issues on the M25. Areas in West Kent are impacted by rat running on the rural highway network.

The County Council looks forward to working with Gatwick Airport Limited (GAL) to consider the transport modelling in relation to the West Kent network and to identify the potential

mitigation measures to be delivered through the Gatwick Surface Access Strategy and associated Travel Plan. Objectives, targets and measures to support and encourage trips by sustainable modes, as well as to mitigate highways impacts, will need updating. Measures for sustainable staff travel should also be an important part of the Travel Plan, as a reasonable proportion of the 24,000 employees working at Gatwick live in Kent.

A Construction Management Plan (CMP) is to be provided. The County Council requests involvement in the preparation of the CMP as the proposals are refined, including an investigation of likely construction impact on Kent roads and mitigation of any resulting impact.

It is noted that GAL aims to increase public transport mode share for passengers from 44% to 48% by 2022. Impact on and consideration of options to improve rail services within Kent to accommodate Gatwick bound passengers, such as an enhanced service between Tonbridge and Redhill in order to connect to Gatwick, should be considered. This service currently operates at two trains per hour (tph) in the peaks and could be enhanced to a two tph service all day Monday to Saturday.

Paragraph: 7.6.40 - GAL is encouraged to undertake further research into the destinations that passengers are travelling to and from. Gatwick is the closest airport to Kent, and yet poor public transport connections mean the majority of those travelling to the airport from Kent travel by car. Therefore, KCC requests that the traffic model be extended further to include the whole of Kent. This will allow for the consideration of mitigation measures which may be required on the Strategic Road Network across the region.

Paragraph 7.6.63 - Public transport connections (in particular rail) to the east of the airport are particularly poor. If GAL is to appropriately mitigate the impact of increased traffic volumes on the highway network and increase public mode share to the airport, it is encouraged to work with Network Rail to improve rail connectivity from the airport into Kent. Currently, most rail journeys to Gatwick from Kent are reliant on interchanging in London which results in journey times more than double that of driving.

7.8 Noise and Vibration

Paragraph 7.8.7 – states “any increases in noise will be due to the increased number of flights on the northern runway”. This is not the case, as releasing capacity on the main runway will allow for additional movements by larger aircraft. Increased demand for long haul flights and larger aircraft (such as Airbus A380s) will generate a further increase in noise on the main runway compared to current operations. Combined with increases in noise from the use of the northern runway, it is imperative that noise impacts from use of both runways are considered appropriately.

Paragraph 7.8.24 - It is imperative that the study area of the noise assessment is extended to include Kent, in particular the urban area of Tunbridge Wells, which regularly experiences overflight of Gatwick aircraft at less than 7,000ft.

Paragraph 7.8.31 - Overflight metrics should also include the anticipated growth at Heathrow as a result of a third runway. Kent is overflowed by aircraft from a range of airports in the South East and it is imperative that any consideration of overflight represents a true reflection of the impact on communities.

7.11 Health and Wellbeing

The County Council welcomes the use of an established Health Impact Assessment methodology but would request clarity as to exactly which methodology is to be used. KCC would be in favour of using the Welsh methodology (Chadderdon et al), particularly as it has a quality assurance scheme associated with it (Green et al).

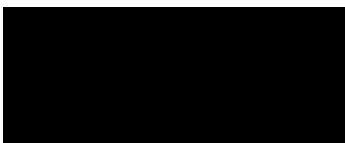
KCC would recommend further consideration of community impacts, and how these affect health and wellbeing.

The County Council is pleased to see the commitment to working with local Public Health teams but would recommend that the applicant must also work with new local NHS organisations such as Integrated Care Partnerships, particularly as these will be a useful way of monitoring future data.

It would also be useful for the applicant to provide details on the acute sector admission rates for cardiovascular and respiratory disease in children as well as adults. The County Council would also expect noise, vibration and air quality to be priorities for the Health Impact Assessment, including both construction and operation phases.

If you require further information or clarification on any matter in this letter, then please do not hesitate to contact me.

Yours sincerely



Barbara Cooper
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Your Ref:

Our Ref: JAE/

Date:

01st October 2019

Mr Kent
(by email)

Dear Mr Kent,

Application by Gatwick Airport Limited for an Order granting Development Consent for the Gatwick Airport Northern Runway (PINS ref TRO20005-000008)

Mid Sussex District Council Response to Scoping consultation

I am writing in response to your letter of 3rd September, in which you seek Mid Sussex District Council's views on the information that should be provided in the Environmental Statement, in its role as a consultation body.

Mid Sussex District Council welcomes the opportunity to be involved in this process and a report which sets out the Council's views is appended to this letter. It may assist you in your consideration of the Councils' response if I highlight a couple of key issues of concern. These are set out below:

There is a need for clarity on the baseline data for the assessment work. It is important from the outset that it is clear what the level of planned growth is, over what timescale and the development that is required to support that growth.

GAL has not satisfactorily demonstrated why it is proposing to scope out housing implications of the Project. A clear analysis of the existing employment patterns and how future jobs will be filled is required to fully understand the population impacts. Until this relationship has been fully assessed it is not possible to assume there is no impact. Therefore, the Council objects to GALs current position on this matter.

Having prematurely scoped out housing implications there is concern about the robust nature of the transport modelling. The parameters of the transport modelling work needs to include population centres, including along the south coast. The local labour market covers a much more extensive area than the area subject to detailed transport modelling. This is significant as the impact of the Project on the transport network will not be fully assessed without understanding relationship between where people live and work. It is also important that existing and consented highway and rail improvement schemes (such as the M23 Smart Motorway and Gatwick Airport Station improvements) are not seen as a solution to mitigate the impact of future growth at Gatwick beyond that already consented. These schemes are required, even without the additional demand that the Northern Runway will bring.

Working together for a better Mid Sussex

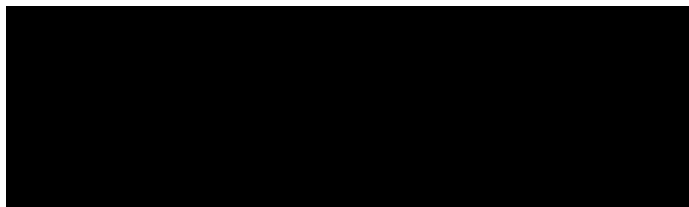
Councillor Jonathan Ash-Edwards
Leader of the Council



There is considerable uncertainty about the scale and location of future growth in the region beyond current local plans which end in the early 2030's. GAL should be encouraged to consider a range of potential future growth scenarios and the very least undertake a cumulative assessment of the worst case.

I trust these comments and accompanying report are helpful to you when considering the Scoping Report submitted by GAL. Mid Sussex District Council looks forward to working with PINS in an ongoing and constructive manner during this Development Consent Order process.

Yours sincerely



Councillor Jonathan Ash-Edwards
Leader of the Council

Gatwick Airport Development Consent Order for Northern Runway

Environmental Impact Assessment
Review of Scoping Report

Mid Sussex District Council

Project number: 60615561

1 October 2019

Quality information

<u>Prepared by</u>	<u>Checked by</u>	<u>Verified by</u>	<u>Approved by</u>
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Revision History

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01	30/09/19	Client comment		Steve Harding	Associate
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Mid Sussex District Council



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Executive Summary

On behalf of Mid Sussex District Council (MSDC), AECOM Infrastructure and Environment Limited ('AECOM') has undertaken a review of the Environmental Impact Assessment (EIA) Scoping Report submitted by Gatwick Airport Limited (GAL) for the proposed increased capacity of operations at Gatwick Airport which GAL intends to apply for a Development Consent Order (DCO) to deliver. The review, undertaken in conjunction with MSDC and their legal and aviation consultants has focused on the following aspects of the EIA Scoping Report:

- the description of development, specifically whether the components of GAL's proposals that will constitute the Nationally Significant Infrastructure Project (NSIP) are adequately explained;
- the approach to the DCO and EIA processes, including the proposals for consultations and how these will be facilitated going forward; and
- the technical assessments proposed, both in terms of the topics scoped in to the assessment and how they will be undertaken.

The review has been undertaken in line with recognised national and international guidance on EIA scoping and the review of topic assessments has been presented under standard themes integral to the EIA process, namely: methodology, baseline, consultation, mitigation and potential impacts and effects.

Generally, the information provided in the EIA Scoping Report is as would be expected for a development of this type, though there are a number of clarifications and recommendations that have been made on each chapter of the EIA Scoping Report that MSDC would request the Planning Inspectorate consider in the preparation of the forthcoming scoping opinion, and GAL address as part of the environmental impact assessment process.

However, there are a number of key issues identified from the information presented in the EIA Scoping Report that are considered imperative for MSDC to understand fully moving forward. MSDC would therefore request that proactive engagement on the following issues is held prior to any future formal submission:

- **Baseline Data** – There is a need for clarity on the baseline data for the assessment work. It is important from the outset that the EIA is clear as to what the level of planned growth in the surrounding area is, over what timescales that growth is expected to come forward and the development that is required to support that growth. The Project must be assessed against a range of underlying growth scenarios to ensure that it does not prejudice the proper planning of MSDC's area and beyond by absorbing infrastructure capacity, etc. that would otherwise be required for wider development allocated in MSDC's Local Plan.
- **Transport Modelling** – The parameters of the transport modelling work need to include population centres along the south coast to ensure the impacts of the proposed development are fully considered. As currently presented the boundaries of the transport model stop just short of the coastal towns which risks significantly understating the likely transport impacts of the proposed development. It is also important that existing and consented highway and rail improvement schemes (such as the M23 Smart Motorway and Gatwick Airport Station improvements) are not seen as a solution to mitigate the impact of future growth at Gatwick beyond that already consented. These schemes are required even without the additional demand that the northern runway will bring.
- **Housing Growth** – Housing and population implications of the proposed expansion are scoped out by GAL. MSDC strongly disagrees with this approach given the sensitive and inherent relationship between economic growth, jobs and population growth. Until this relationship has been fully assessed it is not possible to assume there is no impact and, unless full justification can be provided prior to assessment, the potential impacts of the proposed expansion on local housing and populations should be scoped in by GAL to ensure that the proposed development does not prejudice growth coming forward in the surrounding area. MSDC is concerned that the Project could potentially lead to a significant increase in jobs, which will in turn lead to significant increases in population in Mid Sussex as people move to the area to take up those jobs. This

has the potential to put a significant strain on MSDC's housing supply (including affordable housing in particular) and so it is essential that the population and housing impacts of the Project are fully understood.

GAL should engage proactively and constructively with MSDC, the Gatwick Officers Group and the other host and neighbouring authorities through the DCO process. The various topic working groups should not be used as a tick box exercise and should recognise that proper engagement provides the best chance of securing a development consent (should one be granted) that is acceptable to all stakeholders including, most importantly, local communities. MSDC would welcome timely and appropriate discussions in order for these issues to be included as part of any Planning Performance Agreement.

MSDC is hopeful that the information provided in this review proves to be of assistance to both the Planning Inspectorate and GAL moving forward.

1. Introduction

Gatwick Airport Limited (GAL) is proposing to apply for a Development Consent Order (DCO) under the Planning Act 2008 (as amended) (hereafter referred to as the 2008 Act). The DCO application will aim to secure consent for alterations to Gatwick Airport's existing northern runway to support dual runway operations and accommodate what GAL claim will be an additional 13 million passengers per annum (hereafter referred to as the Project). As part of delivering the Project GAL intends to also make amendments to taxiways, terminals and ancillary facilities, highways and rivers; as well as undertake temporary construction works and mitigation works.

On 2nd September 2019 GAL submitted an Environmental Impact Assessment (EIA) Scoping Report to the Planning Inspectorate (PINS) requesting a scoping opinion from the Secretary of State for Transport under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

Mid Sussex District Council (MSDC) is one of the local planning authorities for the area that will be most affected by the Project and has been consulted by PINS to provide its feedback on GAL's EIA Scoping Report to inform the scoping opinion.

MSDC will reserve its position on the Project until sufficient information has been submitted as part of a DCO application to enable a full and proper assessment of the Project. In the meantime, MSDC is proactively taking steps to understand and provide feedback on the Project to ensure that the position of its residents and businesses is properly protected. As part of this process, MSDC has appointed AECOM Infrastructure and Environment Limited ('AECOM') to undertake a review of the EIA Scoping Report to provide technical feedback to PINS for the DCO EIA scoping opinion. This review has been undertaken with inputs from legal and aviation consultants appointed by MSDC.

This report sets out the findings of the review undertaken by MSDC officers and the consultant support team and therefore provides MSDC's detailed comments on the EIA Scoping Report. It sets out suggested clarifications and recommendations of the potential issues and areas that should be addressed by GAL in order to prepare a robust EIA and application for development consent.

Whilst MSDC is also working closely with the other host and neighbouring authorities and is an active member of the Gatwick Officers Group, this report details solely MSDC's comments on the EIA Scoping Report.

2. Review Approach

2.1 Documents Reviewed

A review has been undertaken of the following documents submitted to PINS by GAL in relation to the Project:

- Environmental Impact Assessment Scoping Report Volume 1: Main Text (September 2019);
- Environmental Impact Assessment Scoping Report Volume 2: Figures (September 2019); and
- Environmental Impact Assessment Scoping Report Volume 3: Appendices (September 2019).

2.2 Scope of Review

The following key documents have been used to inform this review:

- The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ('the EIA Regulations')¹;
- Department for Transport (2018) Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England ('ANPS')²;
- Department of Communities and Local Government (DCLG) (2006) Environmental Impact Assessment: A guide to good practice and procedures - A consultation paper³;
- Institute of Environmental Management and Assessment (IEMA) Environmental Statement Review Criteria (2009)⁴; and
- European Commission (2001) Guidance on EIA: Scoping⁵.

2.3 Structure of Review

MSDC's detailed comments and recommendations are provided in Sections 3 and 4. Section 3 covers the comments in relation to the non-technical aspects of the EIA Scoping Report. Section 4 contains detailed comments and recommendations on each of the technical topics scoped in and scoped out of the ES

In terms of the review of the topic specific sections, each of the following sections has been reviewed where relevant to the spatial context and interests of MSDC.

Scoped-in topics:

- Historic Environment;
- Landscape, Townscape and Visual Resources;
- Ecology and Nature Conservation;
- Water Environment;
- Traffic and Transport;
- Air Quality;
- Noise and Vibration;
- Climate Change and Carbon;
- Socio-economic Effects;
- Major Accidents and Disasters; and

¹ <http://www.legislation.gov.uk/ukxi/2017/572/contents/made>

² <https://www.gov.uk/government/publications/airports-national-policy-statement>

³ <http://www.communities.gov.uk/archived/publications/planningandbuilding/environmentalimpactassessment>

⁴ http://www.iema.net/download/membership/corporate/Review_Criteria.pdf

⁵ <http://ec.europa.eu/environment/eia/eia-guidelines/g-scoping-full-text.pdf>

- Cumulative Effects and Inter-relationships.

Scoped-out topics:

- Planning Policy Context;
- Material Assets;
- Radiation and Heat;
- Daylight, Sunlight and Microclimate;
- Decommissioning Effects; and
- Airspace Change Process.

The review has considered the following aspects of the technical topics:

- baseline information provided;
- consultation undertaken to date and future consultation during the EIA process;
- identification of environmental effects to be included and scoped out of the assessment;
- temporal and spatial scope of the assessment;
- proposed scope and methodology; and
- built in mitigation.

The following topics that form part of the scope of the EIA were not reviewed as these topics were not deemed to have any bearing on the interests or spatial context of MSDC:

- Geology and Ground Conditions;
- Health and Wellbeing;
- Agricultural Land Use and Recreation;
- Waste; and
- Transboundary Effects.

3. Review of Non-Technical Chapters

3.1 Chapter 1 - Introduction

Chapter 1 of the EIA Scoping Report deals with a number of introductory matters and provides a brief overview of the Project.

3.1.1 Consenting Regime

Paragraph 1.5 of the EIA Scoping Report sets out GAL's explanation for why the Project is a Nationally Significant Infrastructure Project (NSIP), namely that it is an alteration of an existing airport that would *"increase by at least 10 million per year the number of passengers for whom the airport is capable of providing air passenger transport services"*. The EIA Scoping Report is not explicit, but it is clear that GAL is suggesting that the Project falls within section 23(1)(b) of the 2008 Act.

MSDC recommends that in any future consultation material (both non-statutory and statutory) and in the application itself, GAL must clearly set out, with evidence and explanation, why GAL considers the Project to meet the section 23 2008 Act tests.

Paragraph 1.5.3 suggests in broad terms that the Project as a whole is an NSIP. This is considered to be incorrect. It will be important for GAL to identify those elements of the Project that are considered to be the NSIP and those that are associated development (within the meaning of section 115 of the 2008 Act).

MSDC would expect to see the answers to the following key questions presented in the Environmental Statement (ES):

- What is the increase in capacity?
- What are the alterations proposed?
- To what extent do those alterations have the effect of increasing the capacity?
- How will the reference to 'Highways NSIP' be clarified?

Each of these questions is considered in more detail below.

3.1.2 What is the increase in capacity?

GAL will need to demonstrate that the Project will result in an increase of at least 10 million passengers per annum ('mppa'). However, there is inconsistency in the EIA Scoping Report as to how GAL has approached the passenger capacities of the various scenarios it has considered.

Paragraph 1.3.3 states that:

"It is anticipated that by 2038 these improvements [i.e. the Project] could increase airport capacity up to approximately 74 million passengers per annum (mppa), compared to a maximum potential capacity based on existing facilities of 61 mppa within the same timescale. This represents an increase of approximately 13 mppa."

Paragraph 3.2.4 refers to the maximum capacity of the single runway as being approximately 57 to 61 mppa in 2032 through investments in terminal facilities, operational efficiency and resilience, improvements to surface access and car parking and provision of additional commercial facilities. Paragraph 3.2.6 suggests that beyond 2032 the capacity of the airport is effectively capped at approximately 61 mppa as this is the capacity of the single runway.

The EIA Scoping Report notes at paragraph 3.2.9 that Scenario 2 (i.e. the Project) *"would allow passenger throughput to increase to approximately 68 to 70 mppa by 2032"*.

GAL will need to provide robust evidence for all these passenger projections. However, based on the information in the EIA Scoping Report it is unclear whether the assessment year is intended to be 2032 or 2038, which would potentially have the following consequences:

- If 2038, the capacity increase would appear to be at least 13 mppa (i.e. 61 mppa to 74 mppa), thereby satisfying the requirements of section 23(5)(a) of the 2008 Act.

- If 2032, the capacity increase would appear to be potentially as little as 7 mppa (i.e. 61 mppa to 68 mppa), thereby not satisfying the requirements of section 23(5)(a) and therefore falling outside the NSIP regime entirely.

MSDC therefore would expect to see clear explanation and justification as to the capacity provided by the 'with' and 'without' development scenarios and their phasing (in order to justify the use of a particular assessment year).

3.1.3 What are the alterations proposed?

As summarised in paragraph 1.3.4 of the EIA Scoping Report and expanded upon in Section 5, the Project comprises a wide range of elements that vary in characteristics.

It should be noted that only that part of the Project that is the "alteration" of Gatwick Airport within the terms of section 23(4) constitutes the "NSIP". Before the "effect" of the "alteration" can be considered, as required by section 23(4)(b), what comprises an "alteration" should be looked at first, and this is defined in section 23(6) of the 2008 Act as including:

"the construction, extension or alteration of:

- (a) a runway at the airport,*
- (b) a building at the airport, or*
- (c) a radar or radio mast, antenna or other apparatus at the airport."*

It is clear, therefore, that a number of elements of the Project do not appear to meet this definition. For example, the reconfiguration of taxiways does not comprise works to the runway itself, nor does it involve the construction of a building (instead being an engineering operation).

While there is nothing to stop these non-"alteration" elements of the Project being consented as associated development, it will be important for GAL to be clear as to exactly which elements it considers to be the NSIP and those which it does not. This should be presented clearly in any forthcoming application documentation.

3.1.4 To what extent do those alterations have the effect of increasing the capacity?

There are various works comprised within the Project that are capable of satisfying the definition of an "alteration". For example, extensions to the terminals constitute the extension of a building at the airport.

However, it is important to note that for the "alteration" to fall within section 23 and thus be an NSIP, it must have the effect of increasing the passenger capacity of Gatwick Airport by at least 10 mppa. It appears that there are a number of elements of the Project that would not have the effect of increasing the capacity in this way and instead constitute part of a more general 'refresh' of facilities at Gatwick Airport. As an example, for the terminal extensions, the question is whether these extensions have the effect of increasing capacity at Gatwick Airport or whether these extensions are being pursued for other reasons.

MSDC expects GAL to carefully assess each element of the Project and come to a clear view as to what forms the NSIP and what forms associated development. Considering the presentation of the Project in the EIA Scoping Report, it could be argued that the NSIP is limited to the physical works to the existing northern runway, with everything else falling into the category of associated development. How will reference to the 'Highways NSIP' be addressed?

Paragraph 1.5.3 of the EIA Scoping Report includes the following statement:

"..it is noted that the Project may include works that constitute a highways NSIP in their own right".

Although this could be the case it is not currently apparent what the highways NSIP would be. Paragraphs 5.2.46 to 5.2.50 (inclusive) outline a series of potential highways works to improve access to the South and North Terminals. It is suggested that some of these works may involve works to the M23 Gatwick Spur. This could mean they are an NSIP in their own right under the 2008 Act.

MSDC appreciates that, at this stage, the highways improvements have not been sufficiently developed for GAL to make a formal judgement as to whether the works themselves constitute an NSIP. However, once the package of improvements has been settled, it would be expected for GAL to carefully consider those elements of the Project against the NSIP thresholds in section 22 of the 2008 Act. This is important, as GAL will need to carry out its environmental assessment of any highways NSIP against the National Policy Statement for National Networks. MSDC therefore requests that GAL should seek to provide clarity in respect of the highway works as soon as possible.

3.1.5 Summary of Recommendations and Clarifications

Table 3-1 below provides a summary of the recommendations and clarifications relating to Chapter 1 – Introduction, which MSDC requests that PINS consider when adopting a scoping opinion.

Table 3-1 Summary of Recommendations and Clarifications: Chapter 1 - Introduction

ID Recommendation / Clarification required

1	It should be clearly set out as to how the Project is set to meet the Section 23 2008 Act tests
2	It should be clearly stated how GAL will achieve the increase in passenger capacity within the scenarios set out in the EIA Scoping Report
3	When setting out the passenger projections (with evidence) GAL should clarify whether this will be achieved by 2032 or 2038
4	It should be clarified as to which elements of the Project will be an "alteration" or not (within the meaning of section 23 of the 2008 Act), and for it to then be clarified which elements equate to NSIP and those that do not.
5	It should be clarified as to which works will clarify as a highways NSIP, and for GAL to consult with MSDC (and other stakeholders) when the package of improvements has been finalised.

3.2 Chapter 2 – Consenting Process

Chapter 2 sets out an overview of the NSIP consenting process, applicable planning policies and GAL's approach to consultation.

3.2.1 Planning policies

Paragraph 2.2.2 notes that the Airports National Policy Statement does not cover the Project. Consequently, the Project falls to be determined in accordance with section 105 of the 2008 Act. As such, GAL cannot rely on any National Policy Statement to provide its "need" case, which must be explicitly set out by GAL.

Paragraph 2.2.10 and Table 2.2.1 notes that the ES will consider the Mid Sussex District Plan 2014-2031. MSDC agrees that the policies contained therein must be considered. MSDC notes that its emerging Site Allocations Development Plan Document should be added to the 'Emerging Policy' column in Table 2.2.1.

Paragraph 2.2.11 notes that relevant supplementary planning documents will be considered. MSDC does not consider that it has any relevant supplementary planning documents.

3.2.2 Consultation

Paragraphs 2.3.7 to 2.3.9 (inclusive) set out GAL's proposed approach to consultation with MSDC and the other affected local authorities. MSDC welcomes GAL's commitment to a formal programme of consultation with authorities and would strongly encourage GAL to engage fully, openly and constructively with officers and members of all relevant authorities. MSDC would discourage the use of the various Topic Working Groups as a tick box exercise and would encourage GAL to take advantage of the wealth of knowledge and understanding of the local communities that the authorities can bring to the Project. MSDC would expect GAL to provide information to the authorities in a timely fashion and with adequate time to enable officers to review and interrogate it before discussing it with GAL at Topic Working Groups. MSDC strongly believes that proper engagement with the authorities is in GAL's interest and would provide the best chance of securing a development consent (should one be granted) that is acceptable to all stakeholders including, most importantly, local communities.

MSDC would welcome timely and appropriate discussions in order for these issues to be included as part of any Planning Performance Agreement.

Diagram 2.3.1 of the EIA Scoping Report identifies the Topic Working Groups. As MSDC has previously communicated to GAL, MSDC maintains that there should be Working Groups established for the following topics:

- airport operations;
- health; and
- S106 obligations.

Paragraph 2.3.16 states that *"it is proposed that the Preliminary Environmental Impact Report (PEIR) will take the form of a draft ES."* A PEIR is not an ES, rather its purpose is to aid and inform a meaningful consultation. Accordingly, MSDC would urge GAL to think creatively about how best to set out the preliminary environmental information that will enable and encourage consultees to respond rather than potentially being intimidated by a large, technical document.

MSDC notes that there is no mention in Section 2 of any rounds of non-statutory consultation. The text only refers to "formal" consultation. Again, MSDC would urge GAL to programme into its timetable non-statutory consultation prior to its statutory consultation. This will assist in the Project's evolution and ensure the public understand the Project and provide their input.

3.2.3 Summary of Recommendations and Clarifications

Table 3-2 below provides a summary of the recommendations and clarifications relating to Chapter 2 – Consenting Process, which MSDC requests that PINS consider when adopting a scoping opinion.

Table 3-2 Summary of Recommendations and Clarifications: Chapter 2 – Consenting Process

ID Recommendation / Clarification required

1	Conduct a thorough consultation process with MSDC and other relevant authorities
2	GAL should engage with the Gatwick Officers Group, to establish the requirements, roles, lines of communication and review turnaround times and to seek their advice as early as possible
3	Use non – statutory consultations alongside statutory consultations to make sure the general public are understanding the Project and how they can have an input.
4	Use the vast knowledge and understanding of the local communities to better inform the DCO
5	Ensure the emerging Site Allocations Development Plan Document is added to the ‘Emerging Policy’ column as per Table 2.2.1

3.3 Chapter 3 - Need and Alternatives Considered

Chapter 3 of the EIA Scoping Report sets out a summary of GAL's position regarding the need for the Project, as well as an overview of the alternatives considered.

The report presents three main alternative scenarios that have been considered by GAL:

- Scenario 1: *"where Gatwick remains a single-runway operation using the existing main runway. This scenario would use technology to increase the capacity of the main runway, leading to incremental growth through more efficient operations."*
- Scenario 2: *"where the existing northern runway is routinely used together with the main runway."*
- Scenario 3: *"where GAL continues to safeguard for an additional runway to the south."*

Paragraph 3.2.16 notes that GAL is not actively pursuing Scenario 3 in light of the Government's support for the third runway at Heathrow.

3.3.1 Need

There is substantial emphasis in the EIA Scoping Report on the shortfall in airport capacity across the London airports as the justification for the need for the use of two runways. Scenario 1 is largely dismissed by GAL on the basis that it would not constitute the best use of existing runways.

However, it should be emphasised that the Government's policy on making best use of existing runways is not absolute. Paragraph 1.39 of the Airports National Policy Statement notes that:

"the Government has confirmed that it is supportive of airports beyond Heathrow making best use of their existing runways. However, we recognise that the development of airports can have positive and negative impacts, including on noise levels. We consider that any proposals should be judged on their individual merits by the relevant planning authority, taking careful account of all relevant considerations, particularly economic and environmental impacts."

GAL's approach seems to be that Gatwick Airport has two existing runways, one of which is significantly underutilised, and Government policy is that that underutilised runway should be brought into full use.

There is no assessment of whether the increase in throughput available from greater use of the existing main runway (i.e. Scenario 1) would still leave a shortfall in capacity across the London system. Given that GAL's assessment of the proposed capacity of Scenario 1 is up to 61 mppa at 2032 (as noted above), this is 16 mppa more than the Department for Transport forecasts assumed at 45 mppa (UK Aviation Forecasts 2017) and upon which the statements about shortage of capacity at the London airports was made.

It is also unclear whether a shortfall in capacity would exist if the prospective uplifts in capacity at Stansted, Luton and London City airports are considered alongside the provision of a third runway at Heathrow. Understanding the basis for GAL's usage forecasts and what assumptions underpin them will be fundamental to understanding whether there is a specific 'need' case for the Project and, importantly, the scale of benefits arising from the Project to be weighed against the environmental and other costs.

As the Project is not covered by the Airports National Policy Statement, it is not sufficient to rely on the general presumption in favour of making best use of existing runways without demonstrating the specific need for the use of Gatwick's runways. As a minimum, the demand forecasts need to explicitly state what capacity assumptions have been made regarding the other London airports and then set out what, if any, capacity gap that leaves. This capacity gap then needs to be assessed against:

- Scenario 1 – making best use of the existing main runway which would increase capacity to 61mppa in 2032; and
- Scenario 2 – the Project, which would increase capacity to, at the lowest end, 68mppa in 2032.

In order to pursue Scenario 2, GAL needs to demonstrate whether there is a need to increase the passenger capacity at Gatwick from above 61mppa and, if so, by how much.

In addition to 'need' being considered in the ES as part of the alternatives considered (i.e. the ES needs to justify why Scenario 1 is not sufficient), MSDC considers that GAL must submit a dedicated Need Assessment. It is noted that that this is not listed in paragraph 6.4.2 of the EIA Scoping Report as one of the additional assessments that GAL is intending to submit.

3.3.2 Alternatives

The benefits of the proposed adoption of Scenario 2 as the basis for the Project are set out at paragraph 3.2.17 of the EIA Scoping Report.

Although reference is made to the benefits and to the environmental impact being reduced in scale compared to a new runway to the south (i.e. Scenario 3), neither the Gatwick Master Plan⁶ nor the

⁶ <https://www.gatwickairport.com/globalassets/business--community/growing-gatwick/master-plan-2019/gatwick-master-plan-2019.pdf>

related Report on Consultation⁷ previously published by GAL provide evidence of there being a robust process of appraising the various scenarios. Paragraph 3.2.22 of the EIA Scoping Report refers to the choice between detailed design options for Scenario 2 being set out in the PEIR and ES but there appears to be no suggestion that GAL will present a detailed comparison between Scenario 2 and Scenario 1 and the reasons for pursuing Scenario 2.

Consequently, in MSDC's view there does not appear to have been any transparent 'sift' process for distinguishing between these alternatives systematically by reference to the benefits and costs. GAL's focus instead appears to be on the general support for Scenario 2 expressed by consultees on the Master Plan as set out in the Report on Consultation. See, by comparison, the comprehensive 'Sift Report' published in respect of the Luton Airport DCO. MSDC considers that a similar report is required here in order for GAL to demonstrate that all reasonable alternatives have been properly considered and assessed.

3.3.3 Summary of Recommendations and Clarifications

Table 3-3 provides a summary of the recommendations and clarifications relating to Chapter 3 – Need and Alternatives Considered, which MSDC requests that PINS consider when adopting a scoping opinion.

Table 3-3 Summary of Recommendations and Clarifications: Chapter 3 – Needs and Alternatives Considered

ID Recommendation / Clarification required

- | | |
|---|---|
| 1 | Submit a dedicated Need Assessment demonstrating how the Project will increase GAL's passenger per annum. |
| 2 | To identify why scenario 2 has been picked and to provide evidence and justification as to why |
| 3 | GAL to explain why scenario 1 has been dismissed. |

3.4 Chapter 4 – Existing Site and Operation

Chapter 4 of the EIA Scoping Report sets out a summary of the existing airport operations.

3.4.1 Proposed Projects

Section 4.3 of the EIA Scoping Report sets out a number of consented or proposed projects which GAL states are progressing even in the absence of the Project. Some of these appear to be not yet consented and so should not form part of the base case for the environmental assessment under Scenario 1 (maximum use of the single runway). It may be that the inclusion in the baseline of projects such as the creation of additional car parking spaces is aimed at reducing the scale of the difference in requirements and impact between the 'with' and 'without' Project scenarios.

This is different to the test under section 23 of the 2008 Act, where the capacity of Gatwick Airport should consider what improvements could be made to the Airport under its usual powers, such as permitted development.

It is not clear from this section if those projects identified as being progressed in the absence of the Project and which have not yet been consented, are required as part of the Project to enable the maximum increase in passenger capacity being relied upon by GAL.

Projects that could fall into this category include:

- the new multi-storey car park;
- additional long stay car parking spaces (and automation);
- proposed highway improvements; and
- additional hotels.

⁷ <https://www.gatwickairport.com/globalassets/business--community/growing-gatwick/master-plan-2019/gatwick-consultation-report.pdf>

Table 4.6.1 sets out the parameters which it is claimed are associated with the "existing airport" but some of these rely on other consents and are dependent on assumptions which have not been fully explained. This carries forward to the volume of Figures where it is unclear which elements exist, are consented, are proposed as part of 'without development' Scenario 1 or are part of the Project. This needs to be clarified in order for a meaningful comparison of the existing baseline, future baseline and the Project.

3.4.2 Predicted Future Changes in Passenger Throughput

Paragraph 4.5.1 of the EIA Scoping Report (and Diagram 4.5.1) asserts that most of the growth up to 61 mppa in Scenario 1 will arise from growth outside of peak months, with only minor changes to the number of daily movements during the peak summer months (July to September) that are used for noise assessment purposes. No justification or evidence for this statement is provided. All assertions and statements must be justified and evidenced by GAL in any future consultation material, PEIR and the final DCO application documentation.

It is also claimed that growth will come from up-gauging of aircraft size and load factor growth. Again, no justification or evidence for this statement is provided. It should also be noted that paragraph 7.8.7 suggests that only smaller 'Code C' aircraft will be able to use the northern runway which raises questions as to whether the Project represents the best use of existing runways at a time when airlines are moving towards larger planes.

The EIA Scoping Report does not contain sufficient information to enable the validity of these assertions to be tested and it will be important that sufficient information on the basis and composition of the forecasts and a fuller explanation of the specific need for the Project is provided to accompany the PEIR.

3.4.3 Summary of Recommendations and Clarifications

Table 3-4 below provides a summary of the recommendations and clarifications relating to Chapter 4 – Existing Site and Operation, which MSDC requests that PINS consider when adopting a scoping opinion.

Table 3-4 Summary of Recommendations and Clarifications: Chapter 4 – Existing Site and Operation

ID Recommendation / Clarification required

1	Identify which elements currently exist, which are consented, proposed as part of 'without development' or are part of the Project.
2	Provide evidence for the statement of changes to number of daily movements
3	Provide evidence for the claim that growth will come from up-gauging of aircraft size and load factor growth.
4	Further look into the size of the aircrafts that would be able to utilise the northern runway so that it can be said to making best use of existing runways in line with Section 105 of the 2008 Act.
5	Identify and confirm which of the consented / proposed projects are being relied upon by GAL to increase passenger capacity to its maximum.

3.5 Chapter 5 – Project Description

Section 5 of the EIA Scoping Report sets out an overview of the Project.

3.5.1 Operation of Northern Runway

Paragraph 5.2.4 sets out the basis of operation of the northern runway. This will need to be further explained in terms of how the dependent operation will work in practice and what this means for the runway movement rate per hour, flightpaths and noise.

3.5.2 Profile of Demand

Whereas information was provided in Chapter 4 on the profile of demand over the year expected without the Project, no equivalent information is provided for the 'with development' case. This is a significant omission, particularly in terms of the effect of this profile on the assumptions underpinning the environmental and transport assessment in terms of the seasonal profile (92-day noise assessment) and diurnal profile (traffic peaks). This information is also required to validate the capacity deliverable by the Project.

There would also need to be further explanation as to the profile of demand over the day in order that an assessment can be carried out as to how an increase in capacity for departing aircraft without an equivalent increase in capacity for arriving aircraft will work in practice. Further justification will be required of how the increased movement rate for departing aircraft will impact on the demand for additional aircraft parking areas. No information is provided as to how many additional stands are proposed. Validating the achievable profile of demand over the day and year will be fundamental to assessing the surface access implications of the Project.

3.5.3 Increased Cargo Throughput

Paragraph 4.5.6 notes that in Scenario 1 cargo throughput is predicted to increase from 157,500 tonnes in 2018 to approximately 227,100 tonnes in 2038. Table 5.4.1 predicts that the Project will lead to a further increase by 72,000 tonnes to 300,000 tonnes (presumably in 2038 as well, although this is not made clear).

While the NSIP justification for the Project relies on increased passenger throughput, the increase in cargo throughput in Scenarios 1 and 2 is not insignificant, with the total cargo throughput almost doubling from 2018 to 2038. MSDC expects GAL to properly evidence and justify its assumptions regarding these figures and ensure that the socio-economic impacts of these increases are properly assessed.

3.5.4 Car Parking

Paragraph 5.2.43 notes that the Project will deliver a net increase in car parking spaces of approximately 17,500. The plans apparently "take into account an anticipated reduction in the number of spaces currently provided in unauthorised car parking sites away from the airport." No evidence or justification is given for this statement. MSDC expects GAL to carefully explain why this reduction is anticipated, as well as the scale of this reduction.

3.5.5 Surface Access

Paragraph 5.2.44 notes that the proposed highways works as part of the Project will have regard to both the proposed increase in passenger numbers and other known and planned developments in the area. It will be crucial to ensure that the list of "known and planned developments" is robust and comprehensive to ensure that the Project does not use up highway capacity that is required to deliver various other developments that have planning permission and/or are allocated in the various authorities' Local Plans. Given the very long-term nature of the Project, MSDC's view is that the list should be drawn very widely and MSDC is happy to work with GAL to identify the developments in Mid-Sussex that should be considered. MSDC's fundamental concern is that the Project cannot be allowed to undermine wider growth in the surrounding area.

Paragraph 5.2.45 notes only two locations where the increase in road traffic volumes is likely to be greatest as a result of the Project: the South Terminal and North Terminal junctions. While these junctions will no doubt be significantly affected, MSDC's view is that the Project is likely to have highways impacts that extend very far beyond these two junctions and the full impact must be properly assessed and understood.

Further concerns regarding highways are set out in sections 3.1.4 and 4.5 of this report.

Paragraph 5.2.51 notes that improvements to Gatwick railway station have recently been granted planning permission by Crawley Borough Council. Paragraph 5.2.52 notes that studies will be undertaken to explore the need for further improvements to the rail station. MSDC expects GAL to properly explain the basis on which planning permission was granted as it seems doubtful that this

would have assumed a significant uplift in passengers to the 74 mppa that GAL is anticipating as part of the Project. MSDC would also expect that if further improvements are required to the railway station, for those improvements to be incorporated into GAL's DCO Application.

3.5.6 Construction Programme

The construction programme at paragraph 5.3.2 seems to suggest some construction commencing in 2021. This is almost certainly earlier than would be achievable under the DCO timetable. Clarity from GAL is required as to this potential commencement date and whether such works would be sought as part of a separate application under the Town and Country Planning Act 1990. Paragraph 6.2.9 seems to also suggest that the environmental impacts are being assessed based on construction commencing in 2022.

Clarity is required as to which construction works would be covered by the DCO Application and which would be consented in advance. GAL will also need to explain the extent to which the environmental impacts affected by the construction sequence have been assessed.

3.5.7 Summary of Recommendations and Clarifications

Table 3-5 below provides a summary of the recommendations and clarifications relating to Chapter 5 – Project Description, which MSDC requests that PINS consider when adopting a scoping opinion.

Table 3-5 Summary of Recommendations and Clarifications: Chapter 5 – Project Description

ID Recommendation / Clarification required

1	Set out how increasing the capacity for departing aircrafts without an increase in capacity for arriving aircrafts will work in practice
2	Provide information indicating where the new parking stands for aircrafts will be located and how many there will be to accommodate the increase in departing aircraft capacity
3	Provide evidence and justification for the car parking and increased cargo throughput
4	Enter into dialogue with MSDC to identify residential and employment allocations and proposals already with planning permission in Mid Sussex (or allocated in the Local Plan), to devise a list of known and planned developments for highways purposes and to identify further where there are likely to be an increase in traffic as a result of the Project
5	To confirm the capacity assumptions made when the planning consent for Gatwick Railway Station improvements, and then to identify if there is any further need for rail improvements and to properly identify the uplift in the number of passengers
6	To explain profile of demand in the 'with Project' scenario.

3.6 Chapter 6 – Approach to EIA

Chapter 6 of the EIA Scoping Report sets out GAL's methodology for carrying out the EIA.

3.6.1 Methodology and Assessment Criteria

Paragraph 6.2.3 states that “Each topic chapter of the PEIR and ES will provide details of the methodology for baseline data collection and the approach to the assessment of effects”. MSDC would again request that the production and publication of the PEIR is undertaken in a way that allows for purposeful consultation to take place.

3.6.2 Baseline Conditions

Paragraph 6.2.5 states that the timing of future "improvements" will be considered through the use of the future baseline. However, if these "improvements" are not consented or not built at the time of the DCO Application, they should not be considered in the future baseline. If they are, then there would be a concern that the "improvements" would reduce the scale of the difference in impact between the 'with' and 'without' Project scenarios.

3.6.3 Assessment Years

Specific comments on the assessment years are made in the topic specific sections of this report where relevant to do so.

Paragraph 6.2.9 sets out the proposed assessment years that are currently being considered. MSDC note that the construction period is envisaged to last for 12 years and it is therefore considered that construction impacts may not necessarily be considered temporary by default. This would depend on how and when specific receptors are affected, and it is expected that the assessment considers and reports on this aspect appropriately.

Paragraph 6.2.11 sets out that:

"There are two potential scenarios for growth in passenger throughput numbers that will be included within the assessments in the ES, which take into account the potential opening date of Heathrow's third runway. The central case for the assessment is based on the current expected opening date of Heathrow's third runway in 2026 and this will be presented within the ES. However, in the event that the third runway cannot be delivered in 2026, the implications of a potential later opening date will also be assessed."

However, the EIA Scoping Report gives no indication as to what that potential later opening date will be or how it will be established. Furthermore, it appears to ignore the prospective uplifts in passenger numbers at London City, Luton and Stansted Airports as a result of planned improvements.

MSDC considers that the choice of assessment years must be carefully considered and justified by GAL and it is likely that additional years will be required to reflect planned capacity increases at the various other London airports.

3.6.4 Significance of effects

Table 6.2.3: Assessment Matrix demonstrates the general approach of how the sensitivity of receptor and magnitude of impact will be combined to identify the significance of an effect. This process is logical and best practice. However, it is not stated in the EIA Scoping Report as to what level of effect will be determined as 'significant'. Whilst it is normally accepted that a significance of effect that is moderate or greater is considered significant, this should be made clear as part of the overall EIA methodology in any future project information.

It is also felt that the current assessment matrix has the potential to cause unnecessary confusion with respect to the implementation of this general approach by topic assessments. Twelve of the possible 25 level of effect outcomes presented in Table 6.2.3 allow for a choice in how the effects are to be reported. Most importantly, the combinations of low sensitivity / high magnitude of impact and high sensitivity / low magnitude of impact result in a significance of effect that could be determined as either minor or moderate. This is likely to have considerable implications in terms of identifying significant effects (depending on how the threshold for classifying significance is set).

3.6.5 Mitigation and Monitoring

MSDC welcomes the approach to mitigating significant effects that is set out in paragraphs 6.2.39 to 6.2.44 and would welcome the opportunity to discuss potential opportunities for embedded or avoidance mitigation with GAL throughout the DCO process.

MSDC welcomes the commitment in paragraph 6.2.43 to identify appropriate monitoring within the PEIR and ES to ensure that proposed mitigation is successful. MSDC notes that the requirements in the EIA Regulations for monitoring, set out in Schedule 4, paragraph 7, only refer to monitoring where significant adverse effects are identified. It would be a missed opportunity if any significant beneficial effects resulting from embedded mitigation as well as any enhancement measures were omitted from any monitoring strategy, as this could provide valuable information in terms of setting or revising best practice standards.

3.6.6 Summary of Recommendations and Clarifications

Table 3.6 below provides a summary of the recommendations and clarifications relating to Chapter 6 – Approach to EIA, which MSDC requests that PINS consider when adopting a scoping opinion.

Table 3-6 Summary of Recommendations and Clarifications: Chapter 6 – Approach to EIA

ID Recommendation / Clarification required

1	Consider how information in the PEIR will be presented in order to aid statutory consultation
2	Future improvements should not be considered in the future baseline if they are not consented or not built.
3	The later opening date of Heathrow’s third runway should it not be delivered in 2026 should be consulted on with stakeholders prior to assessment taking place.
4	The increase in capacity of other airports in and around London should be considered as part of the assessment
5	The assessment matrix reported in Table 6.2.3 should be amended going forward to reduce ambiguity in establishing significant effects
6	MSDC would request that mitigation is identified and confirmed via an iterative engagement process
7	MSDC would encourage GAL to devise a monitoring strategy that incorporated the mitigation for all significant effects, both positive and negative, as well as enhancement measures

3.7 Chapter 8 – Topics Proposed to be Scoped out of the EIA Process

Chapter 8 of the EIA Scoping Report sets out GAL's justification for omitting topics from detailed assessment as part of the EIA.

3.7.1 Planning Policy Context

MSDC agrees with the approach taken with respect to presenting relevant planning policy within the ES.

3.7.2 Material Assets

MSDC agrees with the approach taken with respect to the assessment of material assets within the ES.

3.7.3 Radiation and Heat

MSDC agrees with the approach taken with respect to scoping out radiation and heat from the ES.

3.7.4 Daylight, Sunlight and Microclimate

MSDC agrees with the approach taken with respect to scoping out daylight, sunlight and microclimate from the ES.

3.7.5 Decommissioning Effects

MSDC agrees with the approach taken with respect to scoping out decommissioning from the ES.

3.7.6 Airspace Change Process

MSDC disagrees with the justification for scoping out airspace change from the ES. The assessment of impacts will not consider the changes to airspace being proposed under the Government’s airspace modernisation programme, which for London and the south east is being delivered by the *Future Airspace Strategy Implementation South* (FASI-south). The current timeframe for this major overhaul of airspace management indicates that the changes will be implemented in 2024/25. This is prior to Gatwick’s proposed date for the introduction of the dual runway operations, which is anticipated as 2026. Whilst it is accepted that the FASI-south process is at an early stage (currently Gatwick are at the stage of developing and assessing options), and the outcome is not certain at this time, it is incongruous that this is disregarded given that changes to airspace flight paths are inevitable

Paragraph 7.8.6 asserts that the proposed use of the northern runway will not require changes to the flight paths other than very close to the airport and, so, appears to imply that its implementation is not

dependent on the broader airspace modernisation strategy. This does not appear to be realistic and the limitations on use of the northern runway to smaller Code C aircraft and simultaneous (but dependent) use of the main runway for larger aircraft departures would almost certainly require changes to flight paths. These changes would be required to allow simultaneous use of runways, with some allocation of departing aircraft by direction to, without which there would be no or little capacity gain. It is not correct to say (paragraph 7.8.36) that aircraft departing from the northern runway will simply fly existing Standard Instrument Departure routes (SIDs) and Noise Preferential Routes as this would imply no capacity gain if those SIDs are already operating at minimum Departure-Departure separations, which is likely in peak periods with the maximum use of the existing runway.

Given the large scale changes being made to airspace across the southeast to de-conflict flightpaths, GAL cannot be certain (a) as to whether there will need to be changes to flight paths to facilitate broader changes, accepting that these would not be a consequence of the Project, or (b) how flightpaths to allow simultaneous use of the two runways for departure, with increased capacity, would fit within the re-designed airspace. The EIA Scoping Report potentially oversimplifies the issues, claiming that there will be no new flightpaths leading to new populations being exposed to noise. This cannot be said with any confidence at this point in the airspace change process and GAL needs to explain how it will approach the testing of alternative flight paths in the PEIR and ES.

Whilst it is correct (Section 8.7) that the process of airspace modernisation will be subject to its own environmental assessment and consultation process following CAP1616⁸, it is not robust and potentially raises safety issues for the ES to assume existing flightpaths will not need to change, specifically in this case to accommodate dual use of the two runways. Hence, sensitivity testing will be required to demonstrate the potential effects of airspace changes to ensure that a 'worst case' has been assessed for noise even if new flightpaths are not formally in place by the time of the DCO Application. This differs from the situation of continuing to use just the existing runway on its own (with use of the emergency runway only when the main runway is not in use), which could continue with the existing flightpath until broader airspace changes warranted local adjustments.

3.7.7 Summary of Recommendations and Clarifications

Table 3-7 below provides a summary of the recommendations and clarifications relating to Chapter 8 – Topics Proposed to be Scoped out of the EIA Process, which MSDC requests that PINS consider when adopting a scoping opinion.

Table 3-7 Summary of Recommendations and Clarifications: Chapter 8 – Topics Proposed to be Scoped out of the EIA Process

ID Recommendation / Clarification required

- | | |
|----------|--|
| 1 | Airspace changes should not be scoped out of the ES and further sensitivity analysis of alternative flightpaths will be required to ensure that the 'worst case' has been assessed. |
| 2 | Substantial further information is required as to how the two runways will operate in conjunction with each other to increase capacity as well as further detail on the composition of demand (movements by type and destination) in the peak periods to verify that the operational assumptions are realistic. |

3.8 Chapter 9 – Summary of Matters to be Scoped In/Out

Chapter 9 of the EIA Scoping Report summarises the component parts of the topics that will be scoped in or out of the EIA.

This is a useful summary that clearly explains whether and when topic effects will be considered as part of the EIA. Whilst MSDC has no specific comments on this section of the EIA Scoping Report, please refer to other comments in this report where comments have been made on the scope of the topic assessments.

⁸ Civil Aviation Authority (2018) Airspace Design: Guidance on the regulatory process for changing airspace design including community engagement requirements

Table 3-8 below provides a summary of the recommendations and clarifications relating to Chapter 9 – Summary of Matters to be Scoped In/Out, which MSDC requests that PINS consider when adopting a scoping opinion.

Table 3-8 Summary of Recommendations and Clarifications: Chapter 9 – Summary of Matters to be Scoped In/Out

ID Recommendation / Clarification required

- 1 No comment on this chapter on the assumption that other comments, made in this report, regarding EIA scope are to be addressed**

3.9 Chapter 10 – Structure of the ES

Chapter 10 sets out the proposed structure of the ES.

The proposed volumes and chapter structure are logical and in accordance with an EIA of this scope. Paragraph 10.1.3 outlines the known documents that are likely to be included in Volume 3: Appendices. MSDC notes that this includes the Outline Code of Construction Practice, which it is assumed will be relied upon to confirm embedded mitigation and control mechanisms that will be considered as part of the assessment. MSDC would suggest that if any plans, strategies or similar are to be relied upon as mechanisms for procuring mitigation or enhancements, these should be included in draft within Volume 3: Appendices. This will allow for stakeholders to interrogate proposed mitigation early on in the DCO process.

Table 3-9 Summary of Recommendations and Clarifications: Chapter 10 – Structure of the ES

ID Recommendation / Clarification required

- 1 Any documents that are relied upon for the purpose of taking mitigation into account as part of the assessment, should be included in Volume 3: Appendices.**

4. Review of Technical Topics

This section of the report provides an in-depth analysis of the topic-specific sections included in the EIA Scoping Report, under the key headings of: assessment methodology; baseline conditions; consultation, embedded design mitigation; and potential environmental impacts and effects.

A summary table has been included at the end of each topic review section that includes the key clarifications or recommendations emanating from the review of the EIA Scoping Report, which should be considered going forward with the EIA.

4.1 Historic Environment

4.1.1 Assessment Methodology

The EIA Scoping Report refers to the appropriate national and local planning policy as it relates to the Historic Environment. It should also include reference to non-statutory local archaeological standards, e.g. Sussex Archaeological Standards⁹.

The proposed baseline study areas for the ES set out in EIA Scoping Report section 7.1 are broadly considered to be appropriate. Further refinement, in close collaboration with other topics as details of the Project are clarified, is required, as is engagement and agreement with the statutory heritage authorities, Historic England and the LPA heritage advisers.

Study areas will be linked to the Zone of Theoretical Visibility (ZTV) and airborne noise assessment when these are prepared. The justification provided for this largely correlates with the rationale provided in EIA Scoping Report section 7.2, Landscape, Townscape and Visual Resources.

The proposed study areas for the Historic Environment are as follows:

- Non-designated heritage assets: archaeology – 1 km from the site boundary, with wider consideration of the known local and regional archaeological and historical context. The following points are of note:
 - This is considered appropriate to addressing physical impacts on buried archaeological remains. However, it is not clear if this also applies to physical impacts on any locally listed buildings, non-designated historic structures and historic landscape assets.
 - Archaeological deposit modelling should be undertaken to understand the impact of previous development and identify the potential for any underlying areas of geoarchaeological and palaeoenvironmental significance.
 - Consideration of setting impacts on any non-designated assets, including buried archaeological remains, historic structures and the historic landscape, is not sufficiently well defined in the EIA Scoping Report.
- Designated heritage assets: 3 km from the site boundary, with elements removed where ZTV indicates a lack of potential for visual impacts, although other possible impacts (such as noise) will also be considered within this process. It is possible that designated heritage assets beyond the defined study area will need to be included within this review. The following points are of note:
 - This is not entirely clear at this stage, as the eventual study area will be reliant on the ZTV and ground noise modelling which have not yet been developed. It will be important that this tailored approach is well thought through and discussed and agreed with Historic England and LPA heritage advisers. It may be necessary to extend this area to include any specific 'iconic' assets identified by consultees and stakeholders.
 - The 3 km Historic Environment study area seems to conflict with the 5 km study area proposed in the Landscape, Townscape and Visual Resources Scoping Chapter.

⁹ Chichester District Council/ East Sussex County Council/ West Sussex County Council 2019. Sussex Archaeological Standards 2019. <https://www.eastsussex.gov.uk/media/12608/ar-sussex-archaeological-standards-2019.pdf>

- GAL's Historic Environment and Landscape, Townscape and Visual Resources, and Noise and Vibration teams should liaise closely to avoid any conflicts in factual data, and ensure that, where appropriate, heritage considerations are built into modelling design parameters and the monitoring points.
- The study area will need to take into consideration methodologies used in previous studies at Gatwick Airport and elsewhere, where relevant.
- ZTV modelling will need to be ground truthed via site visits.
- In addition, lighting modelling should be considered.
- For potential airborne noise impacts on tranquillity of heritage assets, the study area will be determined taking into account flight paths and airborne noise contours. It will consider the study area used for the assessment of effects on tranquillity within the Landscape, Townscape and Visual Resources assessment. The following points are of note:
 - The likely geographical extent of the scope is not clear at this stage, as the eventual study area will be reliant on noise and tranquillity modelling. It may involve consideration of impacts on the setting of heritage assets beneath flight paths within the High Weald AONB, Surrey Hills AONB, Kent Downs AONB and South Downs National Park.
 - The Landscape, Townscape and Visual Resources assessment, as reported in paragraph 7.2.34 will identify areas where significant effects on tranquillity due to an intensification of existing noise or visual impacts may occur. Overflowed heritage assets in the landscape within these routes should be scoped into the Historic Environment assessment, even if these are not inhabited dwellings.
 - The study area will need to take into consideration methodologies used in previous studies at Gatwick and elsewhere.
 - The study area is to be confirmed following further consultation and in agreement with Historic England and LPA heritage advisers.
 - Close collaboration with other technical topics will be required.

Assessment years are presented in Chapter 6, Approach to EIA. No specific additional years to be included in the assessment are identified in the Historic Environment chapter.

Assessment criteria are compatible with historic environment elements of the NPPF and with Historic England guidance, and follow standard practice in defining significance criteria and assessment of magnitude of impact and in the significance of effect matrix, presented in Table 6.2.3 of the EIA Scoping Report. However, the criteria are generic and not specific to the historic environment; no heritage-specific versions of Definitions of Receptor Sensitivity (Table 6.2.1) and Definitions of Impact Magnitude (Table 6.2.2) are provided. Giving further details of topic-specific methods of assessment would provide greater transparency in understanding the criteria applied to assessing the Historic Environment.

The methods proposed for baseline collection are considered to be generally robust and appropriate to the needs of the assessment. The EIA Scoping Report notes that preparing the ES will involve detailed desk-based assessment, with:

- A full update and review of HER data and collation of previous fieldwork data, including unpublished reporting. The desk-based assessment should include full summaries and an assessment of the significance of the findings of recent archaeological investigations by GAL.
- Aerial photographic appraisal, LiDAR analysis, and review of project-specific DTM/DSM data;
- Assessment of physical and setting impacts on all designated assets and locally listed buildings. Where relevant, non-designated heritage assets should also be assessed; and
- Review of all structures proposed for demolition to identify heritage values.

Areas within the project scoping boundary that have no previous known impacts will be subject to a staged programme of archaeological evaluation where practicable. This would involve an initial phase of geophysical survey followed by intrusive investigations as appropriate. Some of these locations are noted in the EIA Scoping Report, as stated in paragraph 7.1.31. The ES will need to address all Project elements including, but not limited to, ground disturbance, earthworks, construction

compounds, access roads and flood compensation areas should be included, as well as potential environmental mitigation and enhancement areas.

The proposed setting assessment does not cover non-designated heritage assets. But it should be noted that all heritage assets, regardless of designation, have a setting. The ES baseline will need to treat all non-designated heritage assets appropriately, in line with national policy and guidance.

In addition to visual and airborne noise impacts, the setting assessment should consider air quality, character, movement, lighting, skyglow etc. in accordance with Historic England Historic Environment Good Practice Advice in Planning: 3, The Setting of Heritage Assets (GPA3)¹⁰. If these aspects are being considered, GAL will need to make this explicit. Setting is not confined to visual and noise aspects. The ES will need to provide a systematic, robust and holistic assessment of setting in accordance with GPA3.

Climate change should be included in the ES Historic Environment chapter as it is likely to affect the historic environment baseline over the assessment period through increased flooding, temperature rise, and frequency of more extreme weather events (i.e. heavy rainfall and drought) affecting buildings, buried archaeology, parks and gardens and landscapes¹¹.

The EIA Scoping Report states in paragraph 7.1.22 that tranquillity mapping produced by the Campaign to Protect Rural England¹² will be used as part of the assessment. However, this is not a predictive tool, is becoming outdated, and some of the background methodology behind it is not universally accepted. The Applicant will need to ensure that Historic Environment approaches to tranquillity and study areas closely match the Landscape, Townscape and Visual Resources and Noise & Vibration approaches. It will need to reflect appropriate CAA airspace change guidance, changes to airspace flight paths and overflight metrics to avoid any methodological conflict.

Although the EIA Scoping Report states in paragraph 7.1.30 that there will be collaboration between teams working on the built heritage element of the heritage baseline study and the Landscape, Townscape and Visual Resources assessment, this is not picked up at all in the Landscape, Townscape and Visual Resources chapter; heritage is only cross-referenced in Health & Wellbeing (section 7.11). It is agreed that stronger collaboration will be required between other topics and the Historic Environment team in developing the ES. Where relevant, heritage assets should be included as receptors in noise and vibration modelling and tranquillity assessment.

The EIA Scoping Report provides appropriate early warning of the potential complexity of the archaeological investigations likely to be required and identifies key greenfield areas. A modern disturbance review will be undertaken to scope out previously disturbed areas, as stated in paragraphs 7.1.31 and 7.1.37-8. A standard staged approach to archaeological evaluation and mitigation is proposed, but it is agreed that this can be flexible in line with eventual consultation advice, as reported in paragraphs 7.1.32-33.

4.1.2 Baseline Conditions

The EIA Scoping Report provides in paragraphs 7.1.10 – 7.1.14, a quantification of designated heritage assets within the site boundary / beyond the site boundary and within the 1 km study area, and a list of Areas of High Archaeological Potential (Surrey County Council) and defined Red Archaeological Notification Areas (Crawley Borough Council). However, it provides no information about their character, extent and significance, and no background information on the context and chronologies of the heritage assets. This lack of information means that the EIA Scoping Report does not provide a flavour of the heritage assets involved. For example,

- The Area of High Archaeological Potential (Surrey County Council) partially within the land required for the Project is a Prehistoric occupation/burial site, Horley (RB089)

¹⁰ Historic England 2017. Historic Environment Good Practice Advice in Planning: 3. The Setting of Heritage Assets. (2nd Edition) December 2017. <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>

¹¹ Historic England 2015. Facing the Future: Foresight and the Historic Environment. May 2015. <https://historicengland.org.uk/images-books/publications/facing-the-future/>

¹² Campaign to Protect Rural England(2007) Tranquillity Map: England <https://www.cpre.org.uk/resources/countryside/tranquil-places/item/1839>

- The four Red Archaeological Notification Areas (Crawley Borough Council) within the Project area, which are not described in the EIA Scoping Report, comprise:
 - Bronze Age Settlement to the North of Gatwick Airport, Crawley (DWS8667);
 - Site of an Iron Age Cremation Cemetery, Tinsley Green, Crawley (DWS8660);
 - Roman Occupation, Balcombe Road, Crawley (DWS8661); and
 - Parkhouse Farm Medieval Moated Site, Crawley (DWS8656).

Paragraph 7.1.9 of the EIA Scoping Report confirms that some areas within the site boundary have previously been subject to archaeological investigation, whilst other areas may have been heavily disturbed as a result of the establishment and use of the operational airport.

The EIA Scoping Report briefly notes in paragraph 7.1.16 that previous archaeological investigations within the land required for the Project in the Gatwick North West Zone, where the investigations identified evidence for settlement activity during the Late Bronze Age and Early Iron Age. It notes that archaeological work undertaken in connection with the Flood Storage Reservoir in the south eastern part of the land required for the Project found artefacts of Palaeolithic and Mesolithic date along with evidence for Iron Age settlement including roundhouses. The ES will need to consider the significance of the results of other investigations in detail, such as the New Pollution Lagoon and the Flood Alleviation Reservoir (south of Crawley Sewage Works), which included part of a Late Iron Age cremation cemetery which lies partly within the Water Treatment Works Option 2 Area.

The EIA Scoping Report confirms that substantial background work has already been completed:

- Historic mapping, Historic Landscape Character and LiDAR data have been obtained and assessed;
- Historic aerial photography has been assessed, including specialist digitisation of cropmarks/soilmarks; and
- Previous fieldwork has been reviewed.

However, due to the uncertainty regarding study areas, this initial work may need to be expanded and this should be considered as part of the ES.

Paragraph 7.1.5 confirms that a specialist company has been used to interpret LiDAR data and produce the historic landscape baseline. This is appropriate and aims to ensure specialist competence.

Paragraph 7.1.6 confirms that a site visit and setting assessment were undertaken for designated heritage assets. This is useful but leaves the identification of potentially significant aspects related to non-designated heritage assets, and assets in wider study areas, to a later stage.

Figure 7.1.1 clearly indicates designated heritage assets (scheduled monuments, listed buildings, conservation areas) and some non-designated assets (local sites of archaeological interest and archaeological notification areas). However, non-designated heritage assets such as known sites and find spots; previous archaeological interventions or locally listed buildings are not mapped. The historic environment figure also has no labels to enable identification of the mapped heritage assets – these should be numbered/labelled throughout the EIA process.

4.1.3 Consultation

It is not clear whether adequate consultation has taken place to date, and whether this consultation involved discussion and engagement, or merely provided information.

Historic England is a statutory consultee on all NSIPs and the EIA Scoping Report indicates in paragraph 2.3.10 and diagram 2.3.1 that Historic England have been invited to participate in the Land Use topic working groups where appropriate. However, MSDC notes that GAL has liaised with Historic England directly rather than as part of the topic working group. Consultation has simply comprised GAL presenting on the Project rather than stakeholders being able to raise concerns around heritage matters.

The EIA Scoping Report has no information regarding scoping-stage consultation with the LPA (Archaeological Officers and Conservation Officers) regarding the scope of the ES, the significance of heritage assets, potential Project impacts and effects, and the specification of appropriate and proportionate schemes of archaeological evaluation work to investigate and record archaeological sites and to support the EIA.

The EIA Scoping Report notes in paragraph 7.1.30 that Historic England and LPA heritage advisors will be consulted to agree final viewpoint locations, types of heritage asset subject to loss of tranquillity and the programme of archaeological investigation. It is important that these issues – and study areas – are clarified, agreed and documented at an early stage prior to assessment being undertaken.

4.1.4 Embedded Design Mitigation

The EIA Scoping Report highlights the need for early identification of the potential contribution of the heritage assessment to landscape and structural design and infrastructure location/micro-siting. This is positive, but even at this early stage could go further to provide assurance of heritage inputs into the development of design guidelines / principles (to guide the detailed design) to be detailed in the eventual Outline Environmental Management Plan or similar and secured by the DCO and note the involvement and role of the statutory heritage advisers.

4.1.5 Potential Environmental Impacts and Effects

Most potential impacts or effects have been identified in the EIA Scoping Report. If scoped out, justifications have been provided.

Section 7.1 of the EIA Scoping Report clearly identifies potential impacts on buried archaeology, built heritage and historic areas and historic landscape during the Construction and Operational Phases. The Historic Environment assessment will need to include assessment of road traffic impacts as well as the airborne noise, visual and air quality impacts currently noted in the EIA Scoping Report.

A standard EIA assessment method is proposed. The separate assessments of buried archaeology, built heritage and historic areas and historic landscape seems to follow the divisions of the Design Manual for Roads and Bridges (DMRB)¹³ and addresses relevant NPPF requirements and Historic England's GPA3. DMRB guidance would be appropriate for the road element of the ES but not for the airport part of the ES. This approach may result in a slightly disjointed report, open to criticism that it is not being sufficiently holistic or landscape-oriented. In particular, there may be overlaps between the three elements, potentially resulting in double-counting of impacts and effects within the Historic Environment assessment. It is recognised that there is no single standard for assessing the historic environment, but an appropriate and proportionate methodology should be employed.

Historic Environment aspects to be scoped out of the ES are set out in Appendix 9.1.1: Justification to Support the Scoping out of Aspects and Matters (Table 1). These comprise:

- Effects on buried archaeology within the Gatwick Airport airfield and existing hardstanding areas during the operational phase. All impacts on buried archaeology will be regarded as construction impacts.
 - Appropriate justification is provided – no further effects on buried archaeology would occur during the operation of the Project.
- Effects arising from changes within settings of designated and non-designated heritage assets in urbanised areas of Horley and Crawley during construction and operation. GAL seeks to justify this on the basis that the settings of these heritage assets are already urban and no significant visual effects are likely to occur. The following points should be noted:
 - Horley and Charlwood are located in Surrey; Crawley is located in West Sussex. As such, they are not within the geographical remit of MSDC.

¹³ Design Manual for Roads and Bridges, Volume 11 Environmental Assessment, Section 3 Environmental Topics, Part 2 HA 208/07 Cultural Heritage. August 2007. <http://www.standardsforhighways.co.uk/ha/standards/dmr/vol11/section3/ha20807.pdf>

- Although GAL's proposed approach is acceptable in principle, heritage assets in urbanised areas of Horley and Crawley should be listed in the ES to facilitate review of excluded assets, and it should be made clear whether they fall within the Project ZTV. Potential impacts on setting are not just visual and related to intervisibility; aspects such as noise and vibration, and tranquillity, are relevant.
- Key high sensitivity receptors will include townscapes within conservation areas in Horley and Charlwood, which will need to be addressed in the Landscape, Townscape and Visual Resources chapter of the ES. Potential Project effects on the setting and significance of conservation areas and the heritage assets within them (both designated and non-designated) will need to be assessed in the Historic Environment chapter. GAL's consultant teams working on both topics will need to collaborate to ensure that assessments are consistent and that any areas of overlap are addressed.

The indication of which heritage construction and operational effects are scoped into assessment is clear and usefully presented in table 9.1.1. This is matched by Table 1: Individual aspects proposed to be scoped out of the EIA process in Appendix 9.1.1: Justification to Support the Scoping out of Aspects and Matters.

4.1.6 Summary of Recommendations and Clarifications

Table 4-1 below provides a summary of the recommendations and clarifications relating to the Historic Environment that MSDC would request that PINS consider when adopting a scoping opinion.

Table 4-1 Summary of Recommendations and Clarifications: Historic Environment

ID	Recommendation / Clarification required
1	Any recommendations/consultation advice received from statutory consultees should be provided and discussed as part of ongoing consultation and design development.
2	Given that the DMRB has potentially limited application to airports It should be confirmed how the proposed methodology compares or contrasts to the assessment methods applied in other recent cognate EIAs related to airport schemes.
3	It should be confirmed how the methods used to define study areas for the Historic Environment have been developed in tandem with other topics, including Landscape, Townscape and Visual Resources and Noise and Vibration.
4	The ES should ensure that it describes the areas in which the Historic Environment and Landscape, Townscape and Visual Resources topics overlap or diverge in their methodological approaches to aspects including: <ul style="list-style-type: none"> • study areas; • tranquillity; • viewpoints, viewsheds, photomontages and visualisations; • definition, verification and use of ZTV(s); • setting assessment; • receptor identification and selection; • receptors shared with Noise and Vibration/Human Health topics; • their roles in providing inputs into design and design principles/ guidance; and • conservation areas, individual historic structures and historic landscape.

4.2 Landscape, Townscape and Visual Resources

4.2.1 Assessment Methodology

The temporal scope of effects is stated as the construction phase (including demolition) and operational phase in table 7.2.1: Potential Effects to Be Considered.

Paragraph 7.2.26 sets out that the assessment will incorporate a future baseline scenario. The phased development of the Project will be assessed through to the design year 2038 and this will accord with the assessment years defined in Chapter 6.

Chapter 6: Approach to EIA states that each topic-based chapter will identify the baseline conditions, future baseline (covering improvements to the airport in the absence of the Project) and the assessment years of:

- Construction phase (2022-2034);
- First full year of operation after opening (2026);
- Interim assessment year (2029); and
- Design year, all elements in place (2038).

Paragraph 7.2.27 states that *'both daytime and night time effects will be considered'*, however it is not clear as to whether this will be for each of the above phases stated in Chapter 6.

Paragraph 7.2.28 states that the significance of effect will be described *'upon maturity of landscape planting, where relevant (up to 15 years establishment).'* It is not clear how this 15-year temporal scope will relate to the assessment years in Chapter 6, given that if new planting was implemented at the end of the construction phase in 2034, a 15-year establishment period would result in a temporal scope of 2049 which is beyond the temporal scope stated in Chapter 6.

The temporal scope is therefore unclear in respect of whether night time effects will be considered for all assessment phases and how the 15-year establishment of planting will be included in the assessment.

Paragraph 7.2.21 states that a 5km radius 'area of search' from the Project site boundary has been identified based on the Zone of Theoretical Visibility which *'has also been prepared based on the main new buildings and infrastructure only'* (paragraph 7.2.4). However, it is not clear what heights have been modelled. For example, paragraph 5.2.18 states there is likely to be 50 m high boiler flues. These heights, plus any potential emissions or plumes from the flue should be included in the ZTV modelling and consideration of the 'area of search'.

Paragraph 7.2.22 states that a separate study will be established to *'coincide with overflying aircraft at heights up to 7,000 feet to address effects on landscape tranquillity and visual receptors.'* However, no specific area is defined for this separate study, nor is it stated in paragraph 7.2.34 which provides some additional information on the separate study area. There also appears to be no graphic illustration of this separate study area within Volume 2: Figures. The frequency (given it will be a dual runway operation) and orientation of aircraft should also be included in this study and decisions on landscape and visual receptors.

Paragraphs 7.2.11 sets out the baseline collection methods, which include reviewing planning policy, desktop studies, reviews of published landscape character assessments (including AONB Management Plans) and field surveys. Paragraph 7.2.16 states that *'further viewpoints will be identified and added to the assessment process as required in consultation with local authorities and Natural England'*. These methods of future consultation are considered appropriate, however without any consultation to date, the study area and viewpoints have not been discussed with stakeholders and therefore this is not appropriate to the needs of baseline collection.

Paragraph 7.2.2 states that the assessment will be undertaken with reference to the Guidelines for Landscape and Visual Impact Assessment, Third Edition, 2013 (GLVIA3). However, there is no mention of the term 'susceptibility', which is a key component in the assessment process for a receptor's sensitivity. Reference is made to value, but no specific mention of GLVIA3 Box 5.1 or the criteria to be applied for assessing landscape value.

Paragraph 7.2.2 also states that the assessment will be undertaken with reference to Landscape Character Assessment: Guidance for England and Scotland (2002). This is not an accepted approach as this publication has been superseded by Natural England's "An Approach to Landscape Character Assessment" which was published in 2014.

Paragraph 7.2.8 states that the *'chapter of the PEIR/ES will include consideration of potential airborne noise and visual impacts that may occur as a result of increased flight numbers and changes in the volume of flights along defined flight paths. This could impact on landscape character and visual receptors as a result of a reduction in the perception of tranquillity. The study will include reference to*

the tranquillity mapping undertaken by the CPRE (CPRE, 2007)'. There is however no clarity on how the noise information will be interpreted in the assessment process.

Paragraph 7.8.28 of the noise chapter states '*impacts on tranquillity in the relevant AONBs and National Parks will be assessed and reported in the Landscape, Townscape and Visual Resources chapter*', yet no methodology has been provided for this assessment.

CPRE mapping is a constrained dataset, as acknowledged by the Landscape Institute's Information Note on Tranquillity (1/17), which should be referenced as one of the guidance publications. The methodology needs to state how the tranquillity assessment will relate to CAA' CAP1616 guidance.

No methodology is provided for the lighting assessment, nor what threshold will constitute a 'significant' effect for the landscape and visual assessments.

Whilst the GLVIA3 method is acceptable in principle, further information is required regarding the methodology for the tranquillity assessment and the lighting assessment and clarification on the assessment of receptor susceptibility is required in order to ensure a robust and transparent assessment method.

4.2.2 Baseline Conditions

The Site covers Gatwick Airport, which is characterised by extensive areas of hardstanding for runways, taxiways, aprons and aircraft holding areas, along with numerous terminal buildings and supporting infrastructure including car-parking and road access. The Site is not covered by any statutory landscape designations and both buildings and aircraft associated with the Site are visible from the surrounding landscape.

In respect of the stated 5 km study area, the Site is situated within the Low Weald, which is a broad and low-lying landscape consisting predominantly of agricultural land uses. The Site is between Horley, to the north, and Crawley to the south, which are commuter settlements. In combination with the Site, these settlements form a sprawling pattern across the plains of the Low Weald.

The landform rises considerably to the south of Crawley, and across the High Weald, which is mostly designated as an Area of Outstanding Natural Beauty (AONB). The High Weald AONB is approximately 3km to the south-east of the Site at its closest point and is characterised by an ancient field pattern and tracts of woodland.

To the east of the Site the landform remains relatively flat, with residential land uses and the M23 and London to Brighton railway.

To the north of the Site the landform remains relatively flat across the plains of the River Mole and agricultural fields, before rising gradually across Norwood Hill to a localised ridge line, approximately 3km to the north-west of the Site.

To the west of the Site, the landform follows a similar pattern, remaining generally flat before rising to across Russ Hill to the settlement of Charlwood and extensive woodland at Glover's Wood.

There are a high number of Public Rights of Way (PRoW) across this landscape, including the Sussex Border Path to the west of the Site, which extends to Charlwood and the Tandridge Border Path to the east of the M23.

Visual receptors within the 5km study area could include residents in Horley (which borders the Site), motorists, residents in Crawley and users of PRoW networks. The ZTV presented in Figure 7.2.1 reflects the landform pattern, with the theoretical visibility not extending beyond Norwood Hill and the ridgeline at Charlwood to the west of the Site. This remains relatively constant across the plains to the north and east of the Site and across localised areas of the elevated parts of the High Weald AONB.

The photographs presented in figures 7.2.2 to 7.2.13 in Volume 2 of the EIA Scoping Report are representative of the potential visual receptors. The photographs also convey the influence of vegetation and buildings on the extent of views.

In respect of the undefined 'separate study area' for overflying aircraft, the EIA Scoping Report states this covers the High Weald AONB, and South Downs National Park.

Adequate information on the baseline for the 5 km study area (subject to this extent being reviewed in relation to the above comments on ZTV modelling) and the ability to identify significant effects has been provided.

Information on the undefined 'separate study area' and the ability to identify significant effects has not been sufficiently provided and is not adequate to cover height, orientation and frequency of aircraft, beyond reference to statutory designated landscapes.

4.2.3 Consultation

There is no evidence that stakeholder consultation has been undertaken, however paragraph 7.2.16 states that *'further viewpoints will be identified and added to the assessment process, as required in consultation with local authorities and Natural England'*.

4.2.4 Embedded Design Mitigation

Paragraph 7.2.31 sets out the approach to mitigation and enhancement. It states that the *'provision of suitably designed strategic green infrastructure will be considered to mitigate effects on landscape and visual resources...to improve the character and quality of Gatwick Airport and mitigate any effects on landscape and visual resources within the study area'*.

Figure 5.2.1a illustrates existing and consented environmental mitigation and project elements which includes potential noise mitigation, but no landscape and visual mitigation.

Figure 5.2.1g illustrates potential environmental mitigation and enhancement areas at the western and northern edges of the Site, which could be appropriate to link with existing green infrastructure beyond the Site boundary.

However, with no mention of mitigation via building design and using the assessment to inform the massing and scale of new buildings to reduce visual effects, nor the specific siting of mitigation it is not possible to fully assess the adequacy or appropriateness of the proposed primary mitigation from the information provided in line with the mitigation requirements stated in the Airports National Policy Statement.

4.2.5 Potential Environmental Impacts and Effects

Table 7.2.1: 'Potential Effects to be Considered' sets out the anticipated construction and operation effects at a high level. MSDC agrees with this table in principle, subject to sight of detailed assessments.

For the construction phase these include activities of demolition, construction of upgraded highways and construction compounds, with potential effects of changes to landscape character and views.

Operational activities include the use of the airport, new structures in the airport and upgraded road junctions and these are identified as having the potential to result in significant effects on landscape, townscape and visual receptors.

Seascape effects have been scoped out which is appropriate given the West Sussex coastline is approximately 35 km from the Site.

4.2.6 Summary of Recommendations and Clarifications

Table 4-2 below provides a summary of the recommendations and clarifications relating proposed to Landscape, Townscape and Visual that MSDC would request that PINS consider when adopting a scoping opinion.

Table 4-2 Summary of Recommendations and Clarifications: Landscape, Townscape and Visual

ID Recommendation / Clarification required

- | | |
|----------|--|
| 1 | It should be confirmed whether a night time assessment will be undertaken for all assessment phases |
|----------|--|

- 2 The ES will need to confirm how the effectiveness of new planting will be considered as mitigation for adverse effects within the assessment given its stated 15-year timeframe for establishment and in relation the phases in Chapter 6

- 3 The spatial scope for the 5 km study area should be clarified, given the 50 m height of the boiler and plumes

- 4 The spatial scope for the 'separate' study area' related to over flying aircraft should have regard to frequency and alignment, rather than just height of aircraft

- 5 The methodology for the assessment of receptor's sensitivity should be based upon value and susceptibility, as set out in GLVIA 3

- 6 Given the Landscape Character Assessment: Guidance for England and Scotland (2002) is out of date MSDC would prefer the use of "An Approach to Landscape Character Assessment" in 2014 as this supersedes the 2002 guidance.

- 7 The ES should clearly state the relationship between the noise assessment and tranquillity assessment

- 8 The methodology for the tranquillity assessment should be agreed prior to any assessment being undertaken

- 9 The methodology for the lighting assessment should be agreed prior to any assessment being undertaken

- 10 Baseline information on the 'separate study area' related to overflying aircraft should be confirmed in the ES

- 11 Confirmation of consultation and when this will be undertaken should be confirmed at an early stage. This should also set out details of any proposed photomontages (verifiable views)

- 12 The ES will need to consider how building and structure design will inform part of the mitigation of visual effects

- 13 The threshold at which an effect will constitute a significant effect should be agreed via consultation at an early stage.

4.3 Ecology and Nature Conservation

4.3.1 Assessment Methodology

The temporal and spatial scope has been appropriately identified in the EIA Scoping Report. The temporal scope will include both the construction and operational phases of the airport while the spatial scope includes all surveys for habitats and species within the project site boundary, surveys for highly mobile species (notably bats) beyond the project site boundary if required and collection of data regarding designated sites up to 5km from the site (for local and national designations) and up to 20 km from the site (for international designations). At the request of Natural England impacts on several European sites designated for bats that lie over 20 km from the site boundary will also be considered. Traffic-related air quality impacts on designated sites will be considered for all designated sites within 200 m of a road that is to be subject to a significant change in traffic flows, even if it lay more than 20 km from the development site.

Little information is given on the survey methods and so it is difficult to make any meaningful comments. MSDC expects that all surveys will be carried out in accordance with all applicable statutory requirements, planning policy and guidance and industry best practice.

The assessment of effects on European sites will be undertaken in line with PINS Advice Note 10, which is appropriate. Paragraph 7.3.2 states that '*The assessment of ecological effects for the ES chapter will be undertaken in accordance with the ecological impact assessment guidelines published by the Chartered Institute of Ecology and Environmental Management (CIEEM, 2018)*'. This is appropriate, but it should be noted for the purposes of undertaking the EIA that CIEEM has just released an updated version of this guidance (September 2019).

4.3.2 Baseline Conditions

The scope identifies suitably wide coverage of designated sites around the site, including European sites up to (and in some cases more than) 20 km distant and statutory designated sites within 5 km.

No information on lower-tier wildlife designations is provided but it is noted that information has been requested from the local biological records centre for all sites within 5 km. Records of protected or otherwise notable species have been requested from the local records centres within a 2 km radius of the Project site boundary, except for bats where a larger 10 km radius has been used in accordance with guidance from the Bat Conservation Trust. This is considered appropriate.

The EIA Scoping Report identifies that much of the land within the Site comprises the operational airport and associated hardstanding/buildings, which is generally of little ecological value. Surveys so far have identified:

- the presence of great crested newt breeding in ponds in woodland adjacent to Horleyland Wood and to the north of the River Mole near to the Bear & Bunny Nursery;
- a population of Bechstein's bat roosting in Brockley Woods;
- a population of dormice in an area of ancient woodland;
- small badger setts to the north and south of the runways; and
- grass snake in grasslands along the River Mole corridor.

Depending on the location of roosts the presence of Bechstein's bat is the most significant ecological finding, as this is a very rare species and is particularly dependent on foraging habitat within approximately 1.5 km of its maternity roosts. Paragraph 7.3.22 indicates that bat roost inspection and foraging/commuting surveys including trapping and radio-tracking are being undertaken, which will elucidate the impacts (if any) on the Bechstein's population. This is considered appropriate to the rarity of this species and the difficulty in surveying for it.

Paragraph 7.3.24 identifies a series of watercourses that flow through the site that fish surveys would be undertaken for if required, such as due to a realignment of a watercourse.

4.3.3 Consultation

Consultation with Natural England has been undertaken in defining the scope of the work for statutory designated wildlife sites and a data request has been submitted to Sussex and Surrey Biological Records Centres. This is considered adequate consultation at this point in the process.

4.3.4 Embedded Design Mitigation

No embedded mitigation is discussed at this point in the process.

4.3.5 Potential Environmental Impacts and Effects

Potential effects have been adequately identified for exploration, including the potential for 'bat strike' of Bechstein's bat, which will be investigated through the use of thermal imaging analysis and the assessment of traffic-related effects on designated sites located within 200 m of any road (or surface access route) expected to be subject to a significant change in traffic flows.

A 200 m distance is considered appropriate as this is the zone within which any local elevation in pollutant levels due to traffic reduces to background concentrations. The assessment should note that if any internationally important wildlife sites lie within 200 m of any of the aforementioned surface access routes or roads, then the assessment must not only consider the effects of the Gatwick scheme alone but also 'in combination' with other plans or projects such as housing and employment growth in the relevant local authorities. In order to fully understand if there is a significant change in traffic flows on roads within/adjacent to the designated site at Ashdown Forest, the detailed transport modelling must extend to include these roads (A22/A26/A275).

Paragraph 7.3.28 states that the thresholds for deciding a significant change in traffic will be 'according to the Institute of Environmental Assessment (IEA) thresholds – see Section 7.6'. However, we could not find any reference to these thresholds in section 7.6 (traffic and transport). We are aware that the standard thresholds for road traffic used in Design Manual for Roads and Bridges is a change of 1,000 Annual Average Daily Traffic (AADT) or 200 Heavy Duty Vehicles (HDV) per day but in light

of Mr Justice Jay’s ruling in the ‘Wealden judgment’¹⁴ assessments at internationally important wildlife sites should apply these thresholds to ‘in combination’ changes in traffic flows rather than to the scheme in isolation.

With regard to noise impacts, it should be noted that the standard assessment thresholds described in the scope of the noise and vibration assessment (section 7.8) may not be adequate as a proxy for noise impacts on some ecological receptors such as bats. This may therefore need considering for the EIA depending upon the location of the Bechstein bat colonies and the expected change in the noisescape due to the project.

Paragraph 7.3.46 identifies that two potential impact pathways will be excluded from the scope of the EIA: Direct habitat loss effects within the boundary of designated sites (no habitat loss would occur within any of the identified designated sites, at European, national or local level) and effects of dust on, or changes in water quality at, European designated sites. The closest European site is Ashdown Forest Special Area of Conservation/Special Protection Area, located approximately 12 km to the south east of the Site and no European designated sites are hydrologically linked to the project site. We agree it is appropriate to scope out these two impact pathways.

4.3.6 Summary of Recommendations and Clarifications

Table 4-3 below provides a summary of the recommendations and clarifications relating proposed to Ecology that MSDC would request that PINS consider when adopting a scoping opinion.

Table 4-3 Summary of Recommendations and Clarifications: Ecology

ID	Recommendation / Clarification required
1	It should be noted for the purposes of undertaking the EIA that CIEEM has just released an updated version of their guideline for ecological impact assessment (September 2019)
2	It should be noted that the standard assessment thresholds described in the scope of the noise and vibration assessment (Chapter 7) may not be adequate as a proxy for noise impacts on some ecological receptors such as bats. This may therefore need considering for the EIA depending upon the location of the Bechstein’s bat colonies and the expected change in the noisescape due to the project
3	In light of High Court rulings relating to Ashdown Forest SAC/SPA, assessments at internationally important wildlife sites should apply any thresholds used to determine a significant change in traffic flows to ‘in combination’ changes in traffic flows with other plans and projects, rather than to the Project in isolation, therefore the Transport Model needs to be robust and fit for purpose to ensure this can be assessed

4.4 Water Environment

4.4.1 Assessment Methodology

A study area is proposed of 2 km radius beyond the Project site boundary, although it is stated that this would be extended where a hydrological pathway is identified as part of the assessment phase. This is acceptable. A temporal scope is not specified in the water environment section; however, assessment years are clarified in Chapter 6 of the EIA Scoping Report.

A number of baseline studies are proposed for the Water environment, which should comprehensively cover the required baseline information. This includes; A Flood Risk Assessment and Surface Water Drainage Strategy (which are statutory requirements) and a Water Framework Directive (WFD) compliance assessment to evaluate the impact of the Project on immediate waterbodies. This is likely to be a requirement of the Environment Agency. Further reference is made to modelling currently being developed for surface water drainage and river catchments and the foul sewerage system and plans for a more detailed groundwater assessment.

The proposed assessment approach follows standard best practice including using the guidance as set out in Highways England’s DMRB (2009), Volume 11: Environmental Assessment Section 3: Part

¹⁴ Wealden vs SSCLG. [2017] EWHC 351 (Admin) Wealden District Council vs Secretary of State for Communities and Local Government, Lewes District Council, South Downs National Park Authority and Natural England

10 HD45/09: Road Drainage and the Water Environment (Highways Agency, 2009) to determine the importance / sensitivity of water receptors. Appropriate climate change uplifts are included in the proposed assessment of flood risk. This is considered a robust approach.

4.4.2 Baseline Conditions

A review has been carried out using publicly available information on risks of flooding from rivers, surface water, groundwater, reservoirs and sewers. Mapping has been included for fluvial surface water and groundwater risk identifying a range of high to very low risks across the study area. Sewer flood risk has not been adequately assessed.

Adequate detail is provided with regards to the existing surface water drainage arrangements. Detailed explanation is provided regarding how water is collected and treated via different mechanisms from a water quality perspective. A review has been carried out of all potential WFD waterbodies which are in the vicinity of the site and satisfactory justification is provided for those which as scoped out.

A satisfactory review of groundwater and groundwater-linked receptors is included. There are no public water supplies or associated Source Protection Zones (SPZs) nearby. No review is included of onsite ground investigation reports.

Discussion of the foul sewerage network suggests possible stress on the system which contradicts an earlier statement of low risk of sewer flooding. This should be reviewed.

4.4.3 Consultation

No evidence is included within the EIA Scoping Report that any consultation has yet taken place with the Environment Agency or Lead Local Flood Authority although the intention to do so is noted. A significant amount of baseline data is available in the public domain and an understanding is demonstrated of what the Environment Agency is likely to require. This is considered acceptable at this stage. Consultation with Sutton and East Surrey Water (SESW) is noted in 2015 in relation to water supply planning for the airport.

4.4.4 Embedded Design Mitigation

Mitigation is discussed at a very high level at this stage. This is reasonable as the detailed studies are required before a full understanding of required mitigation can be expected. In addition to construction mitigation to be implemented through a CoCP, it is stated that following better understanding of flood risk through the FRA, flood risk mitigation is likely to include floodplain compensation areas and a drainage strategy incorporating sustainable drainage systems (SuDS). New and upgraded sewers are proposed to address any lack of capacity in the system. SESW's long term water resource planning is reported to already consider future airport expansion.

4.4.5 Potential Environmental Impacts and Effects

The Water Environment chapter has identified an extensive list of potential effects to assess during both the construction and operation phases. This looks to be very comprehensive. GAL should also consider the potential effect of sediments from construction impacting on the surface water drainage in terms of blockage or reducing capacity.

Sufficient justification is provided for the issues scoped out of assessment.

4.4.6 Summary of Recommendations and Clarifications

Table 4-4 below provides a summary of the recommendations and clarifications relating to Water Environment that MSDC would request that PINS considers when adopting a scoping opinion.

Table 4-4 Summary of Recommendations and Clarifications: Water Environment

ID Clarification required

- | | |
|----------|--|
| 1 | Flood risk from sewers should be reviewed in more detail and reported in the ES |
| 2 | A review of existing on-site ground investigations should be included in the ES |

ID Clarification required**3 The assessment should consider the effect of sediment from construction on surface water drainage in terms of blockage and reduced capacity**

4.5 Traffic and Transport

4.5.1 Assessment Methodology

Paragraph 7.6.1 provides an extensive list of national legislation and local planning policy documents with relevance to traffic and transport including the National Planning Policy Framework, London Plan and various local authority Local Transport Plans and Local Plans. Given the proximity of Gatwick Airport to the Strategic Road Network (SRN) the assessment should have cognisance to Department for Transport (DfT) Circular 02/13 'The Strategic Road Network and the Delivery of Sustainable Development'.

Paragraph 7.6.2 identifies the guidance documents to be considered by the assessment including the Design Manual for Roads and Bridges (DMRB), WebTAG, Network Rail 'Station Capacity Planning Guidance' and local highway authority standards where these differ from DMRB. This section should also consider the guidance contained within Manual for Streets (MfS) and Manual for Streets 2 (MfS2) where applicable.

Paragraph 7.6.3 asserts that consideration of the environmental effects of traffic and transport will be undertaken with reference to the guidance set out in the 'Guidelines for the Environmental Assessment of Road Traffic' (IEA, 1993) and 'Guidelines for Environmental Impact Assessment' (IEMA, 2004) (collectively referred hereon as the 'IEMA Guidelines'), and the DMRB, in particular Volume 11 Section 2 'General Principles of Environmental Impact Assessment' (HA 205/08). These references are considered to be acceptable, however it should be noted that the guidance contained within the IEMA Guidelines is dated and its application should be treated with due prudence. Reference should also be made to DMRB Volume 11 Section 3 Part 8 'Pedestrians, Cyclists, Equestrians and Community Effects', Part 9 'Vehicle Travellers', and Interim Advice Note (IAN) 125/15 'Environmental Assessment Update',

Paragraph 7.6.5 outlines the baseline data sources from which data has been collected in order to update Gatwick Airport Limited (GAL)'s existing modelling tools. It is noted that some of the identified data sources relate to data collected in 2016, consistent with the baseline of the modelling tools being used. This raises a concern that the baseline data, when utilised by the assessment, will be more than three years old and potentially unreliable. The validity of this data to inform the current assessment should be demonstrated. Should validity of baseline data not be demonstrated, additional data sources should be explored, comprising additional data collection and/or utilising existing local authority traffic models e.g. MSDC has prepared a new transport model for its area, representing a base year of 2017 and comprising an update to the WSCC County Model.

Paragraph 7.6.26 asserts that the assessment of effects on traffic and transport will be set out as a topic chapter within the ES, supported by a Transport Assessment (TA) and other technical appendices where appropriate. Additionally, the PEIR will include a draft chapter, including as much information as is available at the time of writing. This approach is considered reasonable.

Paragraph 7.6.27 advises that all modes of surface transport will be considered, covering passengers, staff, goods, construction and operational journeys. The identified modes comprise construction traffic movements, private vehicle movements, freight and deliveries, rail, public buses and coaches, private hire and taxis, and walking and cycling. This approach is considered reasonable.

Paragraphs 7.6.28 to 7.6.39 outline the proposed scope of additional baseline and modelling studies to inform the assessment. An extensive list of additional data to be collated is identified alongside a commitment to additional surveys should further gaps be identified. A variable demand model is proposed to identify the background (non-Gatwick) trips alongside the development of an airport mode choice model, integrated with public transport and highway models. It is proposed that the public transport assignment model will use the existing PLANET South model as a basis for the rail assignment and a new model will be developed for bus/coach travel based on the EMME software package. It is proposed that the strategic highway model will use the SATURN software package,

consistent with the source highway models, developed from Highways England's SERTM model refined with detail from West Sussex's Crawley Transport Model and TfL's SoLHAM model. With respect to local highways modelling it is proposed to use the existing calibrated and validated 2016 base Gatwick VISSIM 'Corridor Model' as the basis for modelling forecast years with and without the project. In order to test the effects of passenger growth on densities and crowding at the railway station and on South Terminal departures and inter-terminal shuttle systems, use of the Network Rail calibrated and validated Legion model is proposed. In principle, this appears to represent a comprehensive modelling approach, however the scope and methodology for each model will need to be agreed with the relevant authorities and stakeholders. The applicant should explore the availability of more recently modelled information available from local authority transport models e.g. the MSDC transport model.

Paragraphs 7.6.40 to 7.6.42 outline a proposed 'model architecture' illustrating the relationship between the demand, assignment and simulation models and identify indicative proposed study areas for the modelling studies, illustrated by Figures 7.6.1 and 7.6.2. It is proposed that the extent of the area of detailed modelling (AoDM) will be determined using the original SERTM (highways) and PLANET South (rail) models based on a "confirmed assessment criteria". The proposed assessment criteria should be established at this scoping stage and agreed with the relevant authorities and stakeholders. The indicative AoDM illustrated by Figure 7.6.1 appears to exclude the A27 corridor and key population centres on the South Coast, areas to the east (Tunbridge Wells), areas to the west (Guildford) and elsewhere within the likely commutable area for airport employees, as shown on figure 7.10.1, which indicates the Labour Market is much more extensive than the AoDM wider highways network, being significantly understated. The study area comprising the AoDM should therefore be reviewed and agreed with the relevant authorities and stakeholders as there is justification to extend the catchment area of the AoDM. In order to fully understand the impacts on the Ashdown Forest SAC/SPAC, transport modelling needs to extend beyond the SAC/SPAC boundary to ensure an Appropriate Assessment is properly evidenced.

Paragraphs 7.6.54 to 7.6.60 identify the proposed baselines as 2016 (calibrated and validated model base) and 2018 (informing assessment of effects and feeding into Air Quality and Noise topic assessments) and assessment years as 2026 (first full year of operation), 2029 (interim assessment year, including construction effects) and 2038 (design year, with all airside and landside work completed). It is considered that a baseline of 2019 would be more appropriate, the validity of 2016 base data to inform the assessment should be demonstrated. Section 7.6.59 identifies two potential scenarios for growth in passenger throughput: the first of these is the central case for the assessment based on the current expected opening date of a third runway at Heathrow in 2026. The second of these assumes a delay and later opening date, assumed to be 2030. It is recommended that a third scenario should be considered, representing a 'worst case' scenario where a third runway at Heathrow is not delivered at all within the period of assessment to 2038.

Paragraph 7.6.61 identifies that the PEIR/ES Chapter will be supported by technical studies including a Transport Assessment, transport modelling and a design component related to the development and evaluation of mitigation proposals. The scope and methodology for supporting technical studies should be agreed with the relevant authorities and stakeholders. Technical studies relating to traffic and transport should be appended to the ES where applicable.

4.5.2 Baseline Conditions

Paragraph 7.6.6 summarises the origin/destination patterns, within the UK, for passengers using Gatwick Airport. It is expected that a more detailed analysis will be included in the ES. Additionally, current staff origin/destination patterns should be identified.

Paragraph 7.6.7 reports that 39% of passengers currently arrive at Gatwick Airport by rail and 5% by bus or coach, a combined mode share of 44%. An increase to 48% of mode share is projected by 2022. Projections of baseline mode share should be provided for the assessment years outlined in paragraphs 7.6.54 to 7.6.59 i.e. 2026 (first full year of operation), 2029 (interim assessment year) and 2038 (design year). Additionally, current staff mode share patterns should be identified.

Sections 7.6.7 to 7.6.15 outline the existing baseline conditions with respect to rail and public transport, summarising the rail, bus and coach services currently serving Gatwick Airport and acknowledging that rail services can be busy and the current railway station congested at peak times.

Various improvements to rail and bus infrastructure are referenced, however the assessment will need to establish the extent to which these schemes are committed and whether the existing and/or committed capacity of each service (i.e. each rail and bus route) is sufficient to accommodate passenger demand in the design year 2038.

Paragraphs 7.6.16 to 7.6.21 provide a brief summary of the local highway network, primarily focussed on the north-south M23/A23 corridor serving the M25 to the north and Brighton to the south. Mitigation in respect of Highway England's M23 Smart Motorway project (due to be completed in Spring 2020), enhancements to the M25 South-West Quadrant, and allocated funding in the GAL Capital Investment Programme to improve South and North Terminal roundabouts are referenced and the assessment will need to establish the extent to which these schemes increase capacity on an already congested network. The assessment should also acknowledge alternative routes such as the A24/A264 to the west and the A22/A264 to the east in providing north-south access between the Airport and the south coast.

Paragraphs 7.6.22 and 7.6.23 provide a brief descriptive summary of surface transport facilities within the airport boundary, including recently completed works to improve the North Terminal forecourt, and outlines the number of car parking spaces 'on' and 'off' airport. Additionally, paragraph 7.6.24 identifies a designated cycling and walking route serving Gatwick, Crawley and Horley, forming part of National Cycling Route 21 (London to Brighton). The applicant should have cognisance to the emerging Crawley Borough Council 'Local Cycling and Walking Infrastructure Plan' (LCWIP).

Paragraph 7.6.25 outlines a commitment to achieving 42% of staff journeys to work by sustainable modes (public transport, active travel modes and group travel provided by individual employers for their staff, referred to as "company transport") and 45% including other sustainable travel initiatives (car share and zero emission vehicles) by 2022. Current staff mode share patterns should be identified, and projections provided for the assessment years outlined in paragraphs 7.6.54 to 7.6.59 i.e. 2026 (first full year of operation), 2029 (interim assessment year) and 2038 (design year).

No reference is made to collision data on the surrounding highway network. It is considered that a review of baseline collision data for a minimum of the most recently available three-year period within the study area should be reviewed and assessed.

Paragraphs 7.6.54 and 7.6.55 identify that the baseline data was obtained via an extensive data collection exercise undertaken by GAL in 2016, reflecting the calibrated and validated base year of the modelling tools proposed to be used, and advising that the 2016 data will be extrapolated to provide data to represent the 2018 baseline which will be used to inform the assessment of effects of traffic and transport. This is considered to be a reasonable approach in principle, however a 2019 baseline is considered more appropriate and the validity of 2016 base data to inform the assessment should be demonstrated.

4.5.3 Consultation

Paragraph 2.3 of the EIA Scoping Report sets out the proposed approach to the consultation process and identifies that "*This Scoping Report will form the basis of consultation with statutory bodies regarding the proposed scope of the EIA process*" and that "*This consultation will continue throughout the pre-application process and will inform the development of the Project design and the approach to EIA*".

Table 2.3.1 identifies that consultation has been undertaken with:

- the Department of Transport (April 2019 to discuss master plan scenarios and modelling approach to assess the potential effects on the transport network);
- Highways England (early 2019 to discuss master plan scenarios and Highways England expectations around both modelling and testing of effects and potential mitigation on the highway network);
- West Sussex County Council (April 2019 to discuss master plan scenarios, West Sussex's expectations, a potential modelling approach and study area, including access to the Crawley model network);

- Network Rail (February 2019 to discuss master plan scenarios and potential impacts on the station, South Terminal and inter-terminal shuttle and release of the Legion model used for business case modelling of the station project for use by Gatwick in relation to the DCO); and
- Transport for London (April 2019 to discuss master plan scenarios and the approach to modelling and testing effects, including access to the SoLHAM model network).

No evidence appears to have been presented in the EIA Scoping Report to demonstrate how the content of these consultation discussions has been incorporated into the assessment methodology. Whilst it is recognised that the consultation process is ongoing, further consultation is required with relevant authorities and stakeholders to adequately determine the scope of the assessment and the geographical study area with respect to transport and traffic.

4.5.4 Embedded Design Mitigation

Paragraphs 7.6.62 to 7.6.66 outline the proposed approach to developing mitigation during operation and construction, with identified measures set out in Gatwick's Airport Surface Access Strategy (ASAS) and a Construction Traffic Management Strategy (CTMS). The proposed approaches to mitigation are considered appropriate, however they should additionally include provision for physical highway improvements where such measures are demonstrated to be required by the assessment after these approaches have been evaluated.

4.5.5 Potential Environmental Impacts and Effects

Paragraphs 7.6.43 and Table 7.6.1 set out the effects proposed to be considered in the ES with respect to traffic and transport during the construction and operational phases. Ten potential effects are identified comprising traffic generation and % change (in trips) on the local highway network, severance, driver delay, driver stress, pedestrian and cyclist delay, pedestrian and cyclist amenity, accidents and safety, hazardous loads, effects on rail network and rail users and effects on other public transport services and users. Sensitive receptors are identified as highway users (all modes), pedestrian and cycle modes, rail users and public transport users. The identified effects and sensitive receptors are considered broadly appropriate and reasonable; however, the effects should also consider the absolute change in traffic generation where the local road network is already observed and/or forecast to be operating at or close to capacity in the baseline and/or future baseline scenarios. The assessment of driver delay and effects on other public transport services and users (i.e. bus and coach) should include journey times and journey reliability on key routes to/from the airport.

With respect to the assessment of effects, paragraphs 7.6.44 to 7.6.53 outline the proposed approach applicable to both construction and operational phases, which appears to be in broad accordance with the IEMA Guidelines and DMRB. This section references the approach set out in Chapter 6 of the EIA Scoping Report with regard to identification of receptor sensitivity, impact magnitude and evaluation of significant effects. Paragraph 7.6.52 asserts that the evaluation of significance will be informed by the level of change in demand and detailed transport modelling, underpinned by a narrative approach based on professional judgement. It is suggested that this approach has been agreed with the Department for Transport, Highways England, Network Rail and local authorities but no evidence of this has been provided. The acceptability of this approach should be formally confirmed and agreed with each of the relevant authorities and stakeholders.

Paragraph 7.6.53 identifies that "*Cumulative effects will also be considered, taking into account other proposed developments (committed developments as advised by Highways England, Network Rail and the Department for Transport as being pertinent to the strategic modelling of the impacts from the Project will already be included within transport models)*". It is considered that local authorities should also be consulted with respect to committed developments. An indicative list of committed developments to be included in the cumulative assessment should have been provided by GAL at this scoping stage and agreed with each of the relevant authorities and stakeholders. GAL should discuss and agree a list as soon as possible with relevant authorities and stakeholders and ensure it is kept under review as other developments come forward. From MSDC's perspective, it is vitally important that this list includes not just developments that have planning permission but also sites that are allocated for development in the various Local Plans. This is necessary to ensure that the Project does not use highways capacity that local authorities had assumed would be available to support residential and commercial development coming forward in their areas.

Paragraph 7.6.67 confirms that “*No issues or effects have been scoped out of the assessment*”. This is considered appropriate.

Paragraph 7.6.68 advises that the assessment of effects on users of public rights of way will be provided within the land use and recreation chapter of the ES. This is considered acceptable.

4.5.6 Summary of Recommendations and Clarifications

Table 4-5 below provides a summary of the recommendations and clarifications relating to traffic and transport that MSDC would request that PINS consider when adopting a scoping opinion.

Table 4-5 Summary of Recommendations and Clarifications: Traffic and Transport

ID	Recommendation / Clarification required
1	Given the proximity of Gatwick Airport to the Strategic Road Network (SRN) the assessment should have cognisance to Department for Transport (DfT) Circular 02/13 ‘The Strategic Road Network and the Delivery of Sustainable Development’.
2	The assessment should also consider the guidance contained within Manual for Streets (MfS) and Manual for Streets 2 (MfS2) where applicable.
3	The guidance contained within the IEMA Guidelines is dated and its application should be treated with due prudence.
4	Reference should also be made to DMRB Volume 11 Section 3 Part 8 ‘Pedestrians, Cyclists, Equestrians and Community Effects’, Part 9 ‘Vehicle Travellers’, and Interim Advice Note (IAN) 125/15 ‘Environmental Assessment Update’.
5	It is noted that some of the identified data sources relate to data collected in 2016, consistent with the baseline of the modelling tools being used. This raises a concern that the baseline data, when utilised by the assessment, will be more than three years old and potentially unreliable. The validity of this data to inform the current assessment should be demonstrated. Should validity of baseline data not be demonstrated, additional data sources should be explored, comprising additional data collection and/or utilising existing local authority traffic models.
6	The scope and methodology for each assessment model should be agreed with the relevant authorities and stakeholders. The applicant should explore the availability of more recently modelled information available from local authority transport models e.g. the MSDC transport model.
7	The proposed assessment criteria should be established at this scoping stage and agreed with the relevant authorities and stakeholders.
8	The study area comprising the AoDM should be reviewed and agreed with the relevant authorities and stakeholders as there is justification to extend the catchment area of the AoDM.
9	In order to fully understand the impacts on the Ashdown Forest SAC/SPAC, transport modelling needs to extend beyond the SAC/SPAC boundary to ensure an Appropriate Assessment is properly evidenced.
10	It is considered that a baseline of 2019 would be more appropriate, the validity of 2016 base data to inform the assessment should be demonstrated. Additionally, a ‘worst case’ scenario should be considered where a third runway at Heathrow is not delivered at all within the period of assessment to 2038.
11	The scope and methodology for supporting technical studies should be agreed with the relevant authorities and stakeholders. Technical studies relating to traffic and transport should be appended to the ES where applicable.
12	Current staff origin/destination and mode share patterns should be identified.
13	Various improvements to rail and bus infrastructure are referenced, however the assessment will need to establish the extent to which these schemes are committed and whether the existing and/or committed capacity of each service (i.e. each rail and bus route) is sufficient to accommodate passenger demand in the design year 2038.
14	Mitigation in respect of Highway England’s M23 Smart Motorway project (due to be completed in Spring 2020), enhancements to the M25 South-West Quadrant, and allocated funding in the GAL Capital Investment Programme to improve South and North Terminal roundabouts are referenced and the assessment will need to establish the extent to which these schemes increase capacity on an already congested network.

ID Recommendation / Clarification required

-
- 15** The assessment should also acknowledge alternative routes to the M23/A23 corridor such as the A24/A264 to the west and the A22/A264 to the east in providing north-south access between the Airport and the south coast.
-
- 16** The applicant should have cognisance to the emerging Crawley Borough Council 'Local Cycling and Walking Infrastructure Plan' (LCWIP).
-
- 17** Future staff mode share patterns should be identified, and projections provided for the assessment years 2026 (first full year of operation), 2029 (interim assessment year) and 2038 (design year).
-
- 18** No reference is made to collision data on the surrounding highway network. It is considered that a review of baseline collision data for a minimum of the most recently available three-year period within the study area should be reviewed and assessed.
-
- 19** No evidence appears to have been presented in the EIA Scoping Report to demonstrate how the content of consultation discussions has been incorporated into the assessment methodology. Whilst it is recognised that the consultation process is ongoing, further consultation is required with relevant authorities and stakeholders to adequately determine the scope of the assessment and the geographical study area with respect to transport and traffic.
-
- 20** The proposed approaches to mitigation are considered appropriate, however they should additionally include provision for physical highway improvements where such measures are demonstrated to be required by the assessment after these approaches have been evaluated.
-
- 21** The identified effects and sensitive receptors are considered broadly appropriate and reasonable; however, the effects should also consider the absolute change in traffic generation where the local road network is already observed and/or forecast to be operating at or close to capacity in the baseline and/or future baseline scenarios. The assessment of driver delay and effects on other public transport services and users (i.e. bus and coach) should include journey times and journey reliability on key routes to/from the airport.
-
- 22** The acceptability of the proposed approach to determining the evaluation of significance should be confirmed and agreed with the relevant authorities and stakeholders.
-
- 23** A definitive list of committed developments to be included in the cumulative assessment should be provided at this scoping stage and agreed with each of the relevant authorities and stakeholders. The list should include not just developments that have the benefit of planning permission but also those sites that are allocated for development in Local Plans, to ensure that the Project does not use highway capacity that the host and neighbouring authorities are relying on for other development coming forward in their areas.

4.6 Air Quality

4.6.1 Assessment Methodology

The temporal and spatial scopes of the assessment have been clearly identified. Diffusion tube monitoring is currently ongoing, which will form the baseline of the assessment. Future years have been identified as 2026, 2029 and 2038. The study area for the construction assessment will be 350m from any dust generating activity and up to 500m along construction traffic routes from the site entrances. This is in line with Institute of Air Quality Management (IAQM) guidance. The study area for the road traffic impacts will be determined by screening the change in traffic to determine the "affected roads" in line with IAQM guidance. Roads within 200m of the affected road network will be included in the model, which is in line with best practice.

The baseline data collection methodology is set out in paragraphs 7.7.15 and 7.7.16. All the expected data sources are listed. An air quality diffusion tube survey is ongoing along the A23 Brighton Road and the Hazelwick roundabout. This will be used for verification.

4.6.1.1 Construction

The assessment of dust emissions during construction will be assessed following IAQM guidance. It is proposed to model the construction phase traffic emissions using ADMS Roads, which is a robust approach. However, as the development is likely to be phased over a long period of time, information about how the "worst case" construction time period for construction traffic would be established would be valuable. It will be particularly important to identify receptors that are affected by sequential periods of construction activity, that may create a semi-permanent effect.

4.6.1.2 Operation

A detailed emissions inventory will be built which will include a comprehensive range of sources. Data for these sources will be obtained from published databases and previous assessments of Gatwick Airport, ensuring consistency with previous assessments. Emissions for road vehicles will be calculated using the Defra Emissions Factor Toolkit. Assessment years are set out, but it has not been explicitly stated which year of emissions and background concentrations are to be used for each scenario. This should be specified.

The model proposed to be used is ADMS-Airport, with generation of contour plots of the results. Verification of the model is to be undertaken in line with LAQM.TG(16). Evaluation of significant effects is to be undertaken following IAQM Guidance. It is assumed that roads are to be included in the ADMS-Airport model, however it does not specifically state this. Construction traffic states it will be modelled using ADMS-Roads. Clarification is required on the model to be used and how results from roads and other sources are to be combined.

NO_x and nitrogen deposition rates will be predicted for sensitive habitats at ecological sites within the study. In addition, the Mole Gap to Reigate Escarpment Site of Special Scientific Interest (SSSI)/SAC and the Ashdown Forest SSSI/SAC/SPA will also be assessed due to the sensitive nature of these habitats. The methodology proposed is in line with best practice, however it would be helpful to specify the sites within the study area that will be assessed.

4.6.2 Baseline Conditions

Two AQMAs, Horley (in Reigate and Banstead Borough Council) and Hazelwick Avenue (in Crawley Borough Council), are described as being close to Gatwick Airport and affected by airport emissions. Both have been declared for exceedences of the annual mean NO₂ air quality standard.

There are five continuous monitoring units within 1km of Gatwick Airport and a wide network of diffusion tubes. One continuous monitoring unit is located at the airport at the eastern end of the main runway. Between 2014 and 2018, concentrations at all the continuous monitoring locations have been well below the air quality standard of 40 µg/m³. All the locations are urban background locations.

Diffusion tube measurements around the airport at roadside locations have exceeded the objective over the past few years.

It is evident from the baseline information provided that the main impact is likely to be from road traffic associated with the airport development rather than emissions from the airport and aircraft. The level of baseline information presented is appropriate for scoping.

4.6.3 Consultation

There is no evidence provided of any consultation with any stakeholders.

4.6.4 Embedded Design Mitigation

Where significant effects are identified, appropriate mitigation measures will be recommended based on best practice guidance from the IAQM for dust and odour emissions. Monitoring during construction will be undertaken if required.

Mitigation for operational effects has suggested further electrification of airside vehicles, energy efficient measures, further use of fixed electric ground power at stands, road traffic measures and monitoring of pollutant concentrations at key areas of concern.

It is not clear from the EIA Scoping Report how the operational mitigation measures will be determined. While it is accepted that mitigation measures cannot be specified at this stage, a methodology for determining the level of mitigation required is needed. A health damage cost calculation (Air quality damage cost guidance, Defra January 2019 and Air quality and emissions mitigation guidance for Sussex (Sussex Authorities 2019)) is required to quantify the level of mitigation required. Consultation with the Council on this issue will be vital.

4.6.5 Potential Environmental Impacts and Effects

Potential air quality impacts have been identified and clearly presented in Table 7.7.3. Certain effects have been scoped out of the assessment, for example, the assessment of pollutants other than NO_x, NO₂, PM₁₀, and PM_{2.5}; odour during construction; and impacts from jettisoning of fuel from aircraft. The scoping out of these effects is clearly justified in most cases. However, cross-reference with Contaminated Land would be beneficial to provide more concrete justification of screening out excavation of odorous materials.

4.6.6 Summary of Recommendations and Clarifications

Table 4.6 below provides a summary of the proposed recommendations and clarifications relating to Air Quality that MSDC would request that PINS consider when adopting a scoping opinion.

Table 4-6 Summary of Recommendations and Clarifications: Air Quality

ID	Recommendation / Clarification required
1	What year of emission factors are to be used for each modelling year?
2	What year of background concentration are to be used for each modelling year?
3	Further justification that there will be no emissions of odour from excavation of soil is required.
4	Further information about the methodology to be used to determine the mitigation measures that will be required.
5	What point of the construction phase is to be assessed?
6	The Air quality and emissions mitigation guidance for Sussex (2019) should be included as a key document for the assessment
7	Following Sussex and Defra Guidance, a damage cost calculation should be undertaken to inform the mitigation measures.
8	Operational traffic impacts should be screened for the other AQMAs in Reigate and Banstead. Particularly the one along the M25, which could potentially see an increase in traffic.

4.7 Noise and Vibration

4.7.1 Assessment Methodology

The temporal scope for the ES noise assessments is defined in the EIA Scoping Report for the air noise assessment through four identified assessment years: 2018, 2026, 2029, 2038.

The spatial scope for the ES noise assessments is not defined, although key sensitive receptors have been identified. However, the EIA Scoping Report states that the study area for noise and vibration effects includes all receptors that may experience potentially significant adverse impacts. The specific area cannot be determined until noise levels resulting from the Project have been modelled. The ES should clearly explain how the noise and vibration study has been defined. The Applicant should agree the study area with relevant consultation bodies.

The EIA Scoping Report suggests using historic monitoring data which are acceptable, however, justification will also be required to validate the use of 2016 data as representative of the baseline noise environment for ground noise assessment. It seems that noise monitoring locations are located predominantly to the north and south of the airport. Further baseline monitoring would be required at noise sensitive receptors, especially those are affected by road traffic and construction works. The ES should clearly describe the approach taken with regard to baseline monitoring that informs the assessment.

The contents of the ANPS are regarded as “..an important and relevant consideration in respect of applications for new runway capacity and other airport infrastructure in London and the South East of England”. The requirements set out in the ANPS in terms of noise are not set out in the EIA Scoping Report nor is it explained how they will be responded to in the ES. This information should be set out clearly in the ES.

The assessment should consider the requirements of the Noise Policy Statement for England and the need to establish Lowest Observed Adverse Effect Levels (LOAEL) and Significant Observed Adverse Effect Level (SOAEL) thresholds for noise and vibration during construction and operation. In addition, the Unacceptable Adverse Effect Level (UAEL) should be defined and assessed.

Methods for assessing air noise are in line with requirements set out in national policy and CAP1616a, which is considered to represent current industry standard for assessing air noise. However, in order to account for potential noise increases due to increases in aircraft movements outside the summer peak period, it is recommended that the changes to the L_{den} contours are assessed in addition to the changes in $L_{Aeq,16h}$ daytime and the $L_{Aeq,8h}$ night-time.

Methods for assessment of effects for construction noise, construction traffic vibration or noise emissions from airport operations/plant are not set out. These methods should be clearly set out and justified in the ES.

The EIA Scoping Report does not identify if cumulative effects due to other committed developments will be considered in the ES.

Future Airspace Strategy Implementation South will run parallel with the application for a DCO for the Project and is scheduled to be implemented by 2024. There are likely to be changes in Gatwick Airport's airspace that would affect air noise at receptors. There is no information on how potential changes in flight paths due to airspace modernisation will be considered. Paragraph 5.54 of the ANPS states that:

"The applicant's assessment of aircraft noise should be undertaken in accordance with the developing indicative airspace design. This may involve the use of appropriate design parameters and scenarios based on indicative flightpaths".

Consequently, it is expected that the ES would include consideration of noise implications due to potential changes in airspace based on the best available information.

4.7.2 Baseline Conditions

The EIA Scoping Report suggested using monitoring data during the 2018 summer season (16 June to 15 September) from the Gatwick Airport Noise and Track Keeping (NTK) system monitors as the baseline for assessing air noise. The exact locations of the NTK monitors are not provided in the EIA Scoping Report and so it is not possible to comment as to whether these locations are sufficient.

For ground noise assessment the EIA Scoping Report suggested using baseline noise level measurements conducted in August 2016 with the assumption that no change to 2018. The assumption that no change occurred between 2016 and 2018 needs to be validated if it is to be relied upon.

While the approach of using existing monitoring data is acceptable, it is likely further baseline monitoring would be required at noise sensitive receptors, especially those that are affected by road traffic and construction works, to assess potential noise and vibration effects in the ES. The EIA Scoping Report already identified additional baseline noise levels will be measured in the Riverside Garden Park in the vicinity of the North and South Terminal roundabouts.

4.7.3 Consultation

There is no evidence provided of any consultation with any stakeholders for this specific DCO application although the EIA Scoping Report does list various engagement forums concerning the day-to-day management of the noise as well as growth in air traffic and noise impacts from expansion projects.

4.7.4 Embedded Design Mitigation

Paragraph 5.54 to 5.66 of the ANPS sets out mitigation measures that may be adopted to control air noise. These mitigation measures, where relevant, should be covered in the ES. The only air noise

mitigation measures discussed in the EIA Scoping Report is the noise insulation scheme, which is in line with requirements as set out in Aviation 2050¹⁵.

It is not stated whether Gatwick will adopt a Noise Envelope, as covered in Paragraph 5.60 of the Airports National Policy Statement. A Noise Envelope would be a legally binding framework of limits and controls to manage noise that would be part of the DCO application. It would ensure that the benefits from any further reductions in noise from new aircraft technology can be shared between the airport and the local community.

4.7.5 Potential Environmental Impacts and Effects

Potential noise and vibration effects to be considered are presented in Table 7.8.3 of the EIA Scoping Report. Certain effects have been scoped out of the assessment, these include Quiet Area, Contributions of noise from Auxiliary Power Units (APUs), on-site construction vibration and operational traffic vibration. The scoping out of these effects is justified in most cases. However, noise and vibration from off-site construction works should be considered in more detail as well as construction traffic vibration on the local road network.

For the noise and vibration topics scoped into the assessment, the EIA Scoping Report does not identify how significant effects will be identified nor if there is potential for likely significant effects. Temporary or permanent effects will need to be defined in the ES.

Paragraph 5.2.54 states the need an increase in shuttle service between the north and south terminals may be required. Paragraph 7.6.50 indicates the transport assessment will consider the increased movement of freight to and from the airport by rail. Additional demand for rail transport may be mitigated through increased train movements (paragraph 7.6.63). It is not identified if the noise and vibration impact from potential increases in train and shuttle movements will be considered in the ES.

The assessment of ground noise does not state if it will consider the relocation of the fire training ground (paragraph 5.2.28). Nor, does it state if the use of APUs or ground power units (GPUs) when aircraft are stationary at stands will be considered in the ground noise assessment.

4.7.6 Summary of Recommendations and Clarifications

Table 4-7 below provides a summary of the recommendations and clarifications relating proposed to Noise and Vibration that MSDC would request that PINS consider into account when adopting a scoping opinion.

Table 4-7 Summary of Recommendations and Clarifications: Noise and Vibration

ID	Recommendations / Clarification required
1	The temporal scope of all noise and vibration topics should be set out in the ES
2	The Study Area and the method for defining it should be clearly set out in the ES
3	The ES should clearly describe the approach taken with regard to baseline monitoring that informs the assessment.
4	The ANPS is an important and relevant consideration for the expansion project. The key points set out in the ANPS relating to noise should be set out in the ES along with information on how they have been responded to.
5	The assessment should consider the requirements of the Noise Policy Statement for England and the need to establish LOAEL and SOAEL. In addition, the UAEL should be defined and assessed.
6	The ES should clearly set out its methodology for assessing potential effects from construction noise, construction traffic vibration or noise emissions from airport operations/plant
7	The ES should consider cumulative effects due to other committed developments within the Area of Influence
8	Consultation specific to the DCO application should be undertaken

¹⁵ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/769695/aviation-2050-web.pdf

- 9 Air noise mitigation covered in the ANPS should be referenced, where relevant, and responded to in the ES. Specifically, a Noise Envelope (paragraph 5.60 of the ANPS) should be part of the DCO application.**
-
- 10 The ES should consider the following sources of potential noise or vibration effects or provide additional justification for scoping them out:**
- Off-site construction noise and vibration;
 - Construction traffic vibration; and
 - Noise and vibration from potential increased train/shuttle movements.
-
- 11 The assessment of ground noise should consider noise from training activities at the relocated fire training ground and use of APUs or GPUs for aircraft at stands.**
-
- 12 The assumption that no change occurred between 2016 and 2018 in baseline data needs to be validated if it is to be relied upon**

4.8 Climate Change and Carbon

4.8.1 Assessment Methodology

The temporal and spatial scope has been identified and is considered appropriate. The methods proposed for baseline collection are appropriate to the needs of the assessment. The proposed methodology for the assessment is robust and transparent.

The EIA Scoping Report lists the relevant documents applicable to climate change and carbon, with no description of content or the relevance of the document to the assessment. It should be considered that for the PEIR/ES, it would be prudent and beneficial to have a short paragraph on each document outlining its relevance to the assessment.

4.8.2 Baseline Conditions

The suggested baseline for the In-combination Climate Change Impact (ICCI) assessment and the Climate Change Resilience (CCR) review is adequately described and is judged to be a correct baseline for identifying potential environmental effects. It is noted and accepted that a baseline CCR assessment will not be carried out as the resilience of the existing airport has been previously assessed by GAL through its Adaptation Reporting to Defra under the Climate Change Act 2008 (GAL, 2011; GAL, 2016).

The suggested baseline for the Greenhouse Gas (GHG) assessment is adequately described and is judged to be a correct baseline for identifying the GHG impact.

4.8.3 Consultation

No consultation specific to climate change has taken place. This is considered acceptable at this stage.

4.8.4 Embedded Design Mitigation

As this is a scoping report, it does not contain a full description of embedded design mitigation. This will be covered in the PEIR/ES. The approach to mitigation and monitoring as described in the EIA Scoping Report is considered acceptable.

4.8.5 Potential Environmental Impacts and Effects

Potential effects have been correctly identified and described. The effects scoped out (sea level rise, aviation emissions as specified and accepted under UNFCCC guidelines¹⁶) have adequate justification and their scoping out is accepted.

¹⁶ See paragraph 7.9.46 and table 7.9.5 of Scoping Report

4.8.6 Summary of Recommendations and Clarifications

Table 4-8 below provides a summary of the recommendations and clarifications relating proposed to Climate Change that MSDC would request that PINS consider when adopting a scoping opinion.

Table 4-8 Summary of Recommendations and Clarifications: Climate Change

ID Recommendations / Clarification required

1	It is recommended that the relevance to the assessment of each policy or legislation is fully noted as part of the PEIR or ES
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4.9 Socio-Economic Effects

4.9.1 Assessment Methodology

Four study areas have been identified. The study areas used for the assessment of each effect vary as appropriate to the nature of the specific effect. All study areas have been mapped. The 'Labour market' study area and the 'Five authorities' study area have been spatially defined (by local authority). The 'project site boundary' study area has not been spatially defined as it is not likely to align to existing administrative boundaries. The 'Local' study area is made up of output areas but has not been spatially defined and it is recommended that it should be spatially defined by listing the output areas.

It is stated that, '*projections and forecasts would include data for each of the points in time proposed for assessment during the construction and operational phases of the Project*'. These points of time can be found in Chapter 6: Approach to EIA, paragraph 6.2.9. However, the temporal scope of the assessment is not clearly defined in the chapter. It is recommended that another sub-heading should be included for temporal scope (as done for the spatial scope/study area) in which the temporal scope for the assessment is clearly defined, either through explicit reference to paragraph 6.2.9 or by re-stating the construction phase dates and the operational phase dates. It should be made clear whether the operational phase assessment considers the period from 2026 to 2038 or is to be a snapshot assessment of 2026, 2029 and 2038.

The elements to be studied in the baseline have been comprehensively detailed along with the source of information for the existing baseline and the future baseline. The method of data collection is appropriate to the needs. For example, to assess the future baseline in terms of community facilities, recreation and housing market conditions local authority plans, strategies and evidence-based studies will be used.

The study areas used, and the receptors of effects are sufficiently clear. However, the local study area (Figure 7.10.1) seems to be drawn very tightly, albeit a wider labour market area is also defined. This could have a number of consequences if the focus is drawn too tightly, such as:

- It may understate overheating impacts and any requirements for additional housing over a wider area.
- Adopting a local employee catchment area could make it appear easier to justify a higher proportion of staff using public transport to work which might not be a credible proposition if employees were drawn from a wider area.

Clarity needs to be provided on the treatment of the wider economic Study Areas, with assurances that the future distribution of employee residence be given full consideration.

In terms of the sensitivity of receptors, it is stated that, '*each socio-economic effect will be assessed based upon the sensitivity of each receptor*'. It is recommended that the factors to be considered (listed in Chapter 6) when determining the sensitivity of a receptor should be detailed in the context of socio-economics. In terms of the magnitude of effects, it is stated that '*where possible, the assessments will use adopted policy, standards and other applicable guidance to measure the magnitude of the impacts on relevant receptors*.' It is recommended that the way in which policy, standards and other applicable guidance will be used is made more explicit. This could include; stating whether this will include quantitative analysis where possible; stating how quantitative analysis

would be applied; and giving details of the factors to be considered (listed in Chapter 6) in the context of socio-economics.

4.9.2 Baseline Conditions

The baseline includes the following;

- Population of the 'local study area';
- Population split (young dependents, working age, old dependents) of the 'local study area' compared to the South-East region;
- Economic activity rate of the 'local study area' compared to the South East;
- Unemployment rate of the 'local study area' compared to the South East;
- Percentage of population with NVQ4+ level qualifications in the 'local study area' compared to the South East;
- Percentage of working population in SOC classifications 1-3 in the 'local study area' compared to the South East;
- Household profile (single person, family) in the 'local study area' compared to the South East; and
- Household tenure (social rented, owned) in the 'local study area' compared to the South East.

The baseline does not fully reference data sources and year for which data is provided. It is recommended that, where missing, references and dates are added to the baseline. Furthermore, clarification should be sought on whether the most up to date information has been used to provide a description of baseline conditions.

The increase in GVA due to additional jobs and additional local spend due to the Project are not included in the effects proposed to be assessed. It is recommended that information on GVA generated by employment at Gatwick airport (which will require existing employee numbers) and qualitative information on the level of local spend by employees is included in the baseline assessment. Travel to Work Areas and self-contained rates also need to be assessed to fully understand employment patterns, including the types of jobs people are travelling to and from.

The baseline conditions have only been provided for the 'local study area'. It is recommended that baseline analysis is undertaken for the other three study areas as this may reveal the need to assess further potential environmental effects.

4.9.3 Consultation

There is no specific reference to consultation undertaken to date within the Socio-Economics chapter. The EIA Scoping Report does state the stakeholders who have already been consulted as part of the scoping process, however, this does not include social and community infrastructure providers or key health bodies.

It is recommended that a summary of the consultation undertaken in relation to the socio-economic effects is added to the chapter.

4.9.4 Embedded Design Mitigation

There is no embedded mitigation measures relevant to socio-economics stated in the scoping chapter. It is recommended that if such embedded mitigations exist, they are added to the chapter or it should be stated if they do not exist.

It is stated that, 'specific mitigation and enhancement measures for the different significant socio-economic effects that could be introduced by the Project have not been identified at this stage of the EIA process.' However, appropriate potential mitigating and enhancing measures have been identified. It is recommended that potential enhancement measures prioritising the use of local supply chains also be included.

4.9.5 Potential Environmental Impacts and Effects

Potential effects expected as a result of the Project, including the effects which have been scoped out of the assessment have been identified and their study area and receptor has been stated.

It is unclear as to why the effect on population has been scoped out of the assessment as the justification given in Volume 3, Appendix 9.1.1 contradicts that given in Volume 1, paragraph 7.10.24.

Volume3, Appendix 9.1.1, page 8 of the EIA Scoping Report justifies scoping out the effect on population by stating that *'The operation of the project is not likely to result in an increase in local population. The employment opportunities of the project are likely to be filled by people living in the local area'*. However, there is no evidence provided to suggest that jobs are likely to be filled by people living in the local area, and this may not be the case given the correlation between jobs and population growth.

Volume 1, paragraph 7.10.24 states that, *'Future labour demand will be distributed across a wide labour catchment area so no significant impacts on population levels or housing and community infrastructure needs are expected.'* There is limited evidence (TTWA shown in Volume 3 Figure 7.10.3) provided to show that future labour demand will be sourced from across such a wide area.

The Project is likely to lead to significant job creation both at Gatwick and in the wider economy. MSDC considers that it will be vitally important to understand where employees will live. In MSDC the vast majority of population growth is from internal migration, which in part relates to job opportunities.

Mid Sussex, as well as Horsham and Crawley have very low levels of unemployment: 0.8% of Mid Sussex; 1.1% of Horsham; and 1.9% of Crawley economically active residents claiming out of work benefits, compared to a national average 2.4% and SE average of 1.6%.

Over 50% of Mid Sussex residents currently commute to jobs outside the District. For there to be no change in population within Mid Sussex, all the additional jobs created by the Project would need to be filled by current outward commuters changing career or changing where they commute to. Therefore, it is difficult to see how the conclusion of *'the employment opportunities of the project are likely to be filled by people living in the local area'* can be reached.

MSDC is therefore concerned that the Project will result in potentially significant population growth in its area, which will in turn put increased strain on its housing supply (including affordable housing in particular) and require the identification of additional housing land beyond that identified in its Local Plan. Unless robustly proven otherwise, it is essential that GAL carries out a full and robust assessment of population impacts.

In MSDC's view, a clear analysis of the existing employment patterns, including travel to work data by industries and future job created by the Project and a thorough understanding of how these jobs will be filled must be provided before the impact on population growth can be scoped out. Further justification should be provided by GAL, prior to assessment being undertaken, to determine where the majority of workers will travel from. This should include a clear analysis of the existing employment types at the airport, typical distances travelled to work for each of the employment types, future jobs numbers and job types created by the Project and a thorough explanation of how these jobs will be filled. It is then recommended that the effect on population is scoped in or out based on the results of this study. Any justification for scoping in or out should be agreed with key stakeholders, including MSDC.

The justification for scoping out the effect on property value within the 'project site boundary' is not sufficient. This is currently justified on the basis that there are, 'multiple drivers that can influence residential and commercial property markets trends.' However, the effect of the Project on property values can be isolated and at least qualitatively determined. Therefore, it is recommended that the effect on property values within the 'project site boundary' is scoped into the assessment of effects.

The justification for scoping out the effect on property value outside the 'project site boundary' is inaccurate. It states that, 'there would be no change in flight paths and therefore the potential for effects [on property values] to arise is limited.' However, as stated in section 3.7.6 of this report, any limitations on use of the north runway to smaller Code C aircraft and simultaneous (but dependent) use of the main runway for larger aircraft departures would almost certainly require changes to flight paths to allow simultaneous use and therefore GAL will need to clearly explain how it will approach

the testing of alternative flight paths in the ES'. 'Further analysis of alternative flightpaths will be required to ensure that the 'worst case' has been assessed'. Therefore, it is recommended that the effect on property values outside the 'project site boundary' is assessed based on the worst-case scenario.

Effects on GVA generated by additional jobs and additional local spend due to the Project has not been scoped in or out. This should be scoped in.

4.9.6 Summary of Recommendations and Clarifications

Table 4-9 below provides a summary of the recommendations and clarifications proposed relating to socio-economics that MSDC would request that PINS consider when adopting a scoping opinion.

Table 4-9 Summary of Recommendations and Clarifications: Socio-Economics

ID	Recommendation/Clarification required
1	The 'local study area' should be spatially defined by listing the output areas
2	It is also recommended that there is full consistency in the naming of the study areas, for example, between the main body of text in Volume 1 and the figures in Volume 3.
3	Another sub-heading should be included for temporal scope (as done for the spatial scope/study area) in which the temporal scope for the assessment is clearly defined
4	The factors (listed in Chapter 6) to be considered when determining the sensitivity of a receptor should be detailed in the context of socio-economics
5	The way in which policy, standards and other applicable guidance will be used to determine the magnitude of effects should be made more explicit
6	Where necessary, references and dates should be added to the baseline
7	Clarification should be sought on whether the most up to date information has been used to provide a description of baseline conditions
8	Information on GVA generated by employment at Gatwick airport (which will require existing employee numbers) and qualitative information on the level of local spend by employees should be included in the baseline assessment
9	Baseline analysis should be undertaken for the 'project site boundary', 'labour market' and 'five authorities' study areas as this may reveal the need to assess further potential environmental effects
10	A summary of the consultation undertaken in relation to the socio-economic effects could be added to the chapter, although this is not essential
11	If embedded mitigations relevant to socio-economics exist, they should be added to the chapter, or it should be stated if they do not exist
12	It is recommended that a potential enhancing measure prioritising the use of local supply chains be included in the list of potential mitigating/enhancement measures.
13	Clarification should be provided, prior to any assessment being undertaken, to determine where the majority of workers will travel from.
14	The effect on population should be scoped in or out based on the results of this study. The justification for scoping in or out should then be given consistently in a scoping note.
15	The effect on property values within the 'project site boundary' should be scoped in to the assessment of effects
16	The effect on property values outside the 'project site boundary' should be assessed based on the worst-case scenario of flight path changes
17	Effects on GVA generated by additional jobs and additional local spend due to the Project should be scoped in

4.10 Other Topic Sections

4.10.1 Major Accidents and Disasters

Whilst section 7.14 of the EIA Scoping Report has not been reviewed in detail, pursuant to the interests and context of the MSDC review, it was noted that there was an obvious discrepancy between the proposed assessments for Health and Wellbeing and Major Accidents and Disasters.

The section of the EIA Scoping Report on the proposed Health and Wellbeing assessment (7.11.44) suggests that the implications on the Public Safety Zone will be considered under Major Accidents and Disasters. This latter section on Major Accidents and Disasters (7.14) does not expressly mention Public Safety Zones (PSZ) and, indeed seeks to scope out aircraft accidents (Table 7.14.5) from consideration. This cannot be correct as PSZs remain the current means by which third parties are protected from unacceptable risks in this area. Increased aircraft movements and greater use of the northern runway will inevitably have implications for the shape and scale of the PSZ at Gatwick.

4.10.2 Summary of Recommendations and Clarifications

Table 4-10 below provides a summary of the recommendations and clarifications proposed relating to Major Accidents and Disasters that MSDC would request that PINS consider when adopting a scoping opinion.

Table 4-10 Summary of Recommendations and Clarifications: Other Topic Sections

ID	Recommendation/Clarification required
1	Clarification should be provided as to whether Public Safety Zones are to be considered as part of the assessment. It is the view of MSDC that Public Safety Zones should be included as indicated in section 7.11 of the EIA Scoping Report.

4.11 Cumulative Effects and Inter-Relationships

Section 15 of the EIA Scoping Report provides a comprehensive methodology of how both intra (cumulative) and inter (interactive) effects will be assessed and reported in the ES. The methodology proposed is based on current best practice guidance.

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30 September 2019

Dear Sir / Madam,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by Gatwick Airport Limited (GAL) (the Applicant) for an Order granting Development Consent for the Gatwick Airport Northern Runway (the Proposed Development)

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

Thank you for your letter dated 3 September 2019 consulting Mole Valley District Council (MVDC) (the Council) regarding its opinion as to the information to be provided in the Environmental Statement (ES) relating to the proposed development of the Gatwick Airport Northern Runway.

The Council has had regard to Volumes 1, 2 and 3 of the Environmental Impact Assessment (EIA) Scoping Report prepared by the Applicant and wishes to make the following comments:

General comments

The Council is concerned that at this stage, there is too much uncertainty as to the extent of the Proposed Development for its significant effects to be fully identified and therefore for a robust Scoping Opinion to be provided.

There is particular uncertainty regarding the location and scale of a number of parts of the Proposed Development that would be significant themselves. These include construction of new hotels and office blocks, a wastewater treatment works, relocation of the Central Area Recycling Enclosure (CARE waste processing) facility, and various potential environmental mitigation proposals. The location and scale of highway works is also rather unclear and the Council seeks clarity on whether these would qualify in their own right as a Nationally Significant Infrastructure Project.

The Council questions whether all of the individual projects that form part of the Proposed Development are directly related to the increase in passenger throughput at the airport. For

example, proposed projects such as three new hotels and two office blocks are presented as necessary to achieve passenger growth from 61 million passengers per annum (mppa) to 74mppa, however we note that growth from 46mppa to 61mppa appears to require significantly less provision of this type. We would suggest that these elements are functionally separate from the use of the Emergency Runway and therefore should not form part of the Development Consent Order (DCO) unless there is any evidence forthcoming to suggest otherwise.

Chapter 1 – Introduction

1.3 – Overview of the Project:

1.3.1 – The runway referred to as the ‘northern runway’ or ‘standby runway’ is actually called the Emergency Runway under condition 3 of the relevant planning permission CR/129/1979. It should therefore be referred to as such throughout the Scoping Report and the DCO process.

Chapter 2 – Consenting Process

2.2 – Planning Policy:

2.2.10 –The Council anticipates publishing a draft Local Plan, entitled Future Mole Valley, for consultation early in 2020. This emerging local planning policy should therefore be considered in due course.

2.3 – Consultation Process:

2.3.5 – The Council would encourage early engagement by the Applicant with communities potentially affected by the Proposed Development.

2.3.12 – Diagram 2.3.1 should be updated to include Local Authority Leaders within the same group as the Local Authority Chief Executive Officers. We would also welcome statutory bodies being included within the topic working groups to ensure effective joint working and for transparency purposes.

Chapter 3 – Need and Alternatives Considered

3.1 – Need for the Project:

The Council believe that further assessment should be undertaken to justify the substantial increase in passenger throughput at the airport through the Proposed Development, given the Government’s commitment to achieving an emissions’ reduction target of 100% by 2050, as set out in the Climate Change Act 2008 (2050 Target Amendment) Order 2019. Furthermore, the Section 42 public consultation document on the Expansion of Heathrow Airport (Third Runway) set out that Heathrow will not reach capacity until 2050, raising questions over the need for further runway capacity in the South East in the near future.

Chapter 4 – Existing Site and Operation

4.3 – Proposed/Consented Projects:

The Council seeks clarity on which of the proposed/consented projects either require planning permission or have already gained it, to establish the deliverability of each and to understand the implications if a project were not able to be delivered.

Chapter 5 – Project Description

5.2 – Overview of the Project:

5.2.5 – The Council seeks clarity on the baseline data to be used in the EIA. There is uncertainty as to the growth that will be achieved through the Applicant’s Master Plan ‘scenario 1’ that seeks to utilise technology and more efficient operations to make best use of the existing main runway, and the growth that will be achieved through the Proposed Development itself. The Applicant’s baseline assumption of 61mppa relies on various proposed and/or consented projects however there is no further detail on the deliverability of such projects or indeed the likelihood that these will be implemented. An accurate assessment of the overall impact of the Proposed Development cannot be undertaken without clarity over the baseline it is being compared against.

5.2.18 – The proposed CARE facility, that is stated to have a biomass boiler flue height of approximately 50m, has the potential for significant environmental effects in its own right. The EIA must therefore include full details regarding the location of this facility, the waste to be handled, the outputs and any necessary mitigation measures.

5.2.43 – There is concern that the overall net increase in car parking spaces of approximately 17,500 may surpass demand, which could in turn reduce car parking prices and make driving to the airport more popular. This would have an effect on assumptions made about the number of car journeys to and from the airport in the EIA.

5.2.44 – Improvements to bus services and facilities or other modes of sustainable transport have been wrongly omitted. These should be included as an important part of the Proposed Development.

5.2.50 – It is likely that highway works beyond those proposed at the North and South Terminal Junctions will be required to ensure that the residual cumulative impacts of the Proposed Development on the highway are not severe. These may include increased segregation of sustainable modes of transport or additional capacity through widening. Therefore, the potentially significant impacts of the development on the transport network and the scope of mitigation measures required have not been fully established. The scope of the development should only be finalised once the Applicant has undertaken and completed the Transport Assessment, Airport Surface Access Strategy and any transport modelling as outlined in paragraph 7.6.61.

5.2.52 – It is premature to assume that further works to the rail station are unnecessary considering that studies have not yet been undertaken to confirm this.

5.4 – Summary of Key Parameters:

5.4.1 – The Proposed Development will see an increase in the number of on-airport employees and include facilities such as car parking to facilitate this growth. Employment related trips are more likely to originate locally so have a disproportionate impact on the local transport network. The change in the number of on-airport employees should therefore be included in the summary of key parameters to ensure the impacts of additional employees are fully taken into account.

Chapter 6 – Approach to EIA

6.2 – Proposed Approach to the EIA Process:

6.2.11 – Whilst supportive of the approach taken in choosing assessment years to reflect the assumptions about Heathrow Airport’s third runway opening date of 2026 as a ‘best case’ and 2030 as a ‘worst case’, the Council are aware that the Applicant has not also included scenarios in which the third runway at Heathrow is delayed beyond 2030, and does not open at all. Whilst it is government policy that Heathrow should deliver a third runway by 2030, there is concern that this development simply may not be deliverable in such timescales. Furthermore, it is premature to assume that the proposed development at Heathrow shall go ahead until the relevant Development Consent Order has been

granted. Therefore, it is appropriate that the Applicant also considers both 'delayed third runway at Heathrow' and 'no third runway at Heathrow' scenarios.

6.2.35 – The Council is supportive of following the Rochdale Envelope approach that assumes an absolute worst case, highest environmental impact scenario in the EIA process. However, at this stage there is uncertainty as to both the baseline and the extent of the Proposed Development that therefore makes it difficult to understand what exactly the worst case scenario is.

Chapter 7 – Proposed Scope of Assessment

7.1 – Historic Environment:

7.1.1 – For the avoidance of doubt, the Council would like to make clear that not all of the Mole Valley Local Plan 2000 policies listed as relevant to the Historic Environment were saved following review of the 2000 Local Plan in 2007. Policies ENV40, ENV41, ENV44, ENV45, and ENV46 were not saved and are therefore not applicable.

7.1.39 – No assessment is proposed to be undertaken with regard to the potential effects on the importance of designated heritage assets located within the more urbanised areas of Horley and Crawley. While this concerns land outside the Council's remit, we are concerned that this is an insufficient approach as there are designated heritage assets such as listed buildings, within the built up areas of Horley and Crawley, that are within close range of the airport or near to areas where development is planned through the Project. Such heritage assets have the potential to be affected by the development and should therefore be included in the scope of the EIA.

7.2 – Landscape, Townscape and Visual Resources:

7.2.4 – The Council disagrees with the proposed Zone of Theoretical Visibility (ZTV). This is proposed to be based on existing building heights, which extend to 40m in height as per Table 4.6.1. However, the proposed CARE facility biomass boiler flue height of 50m is considerably taller than any existing structure and the impact of this must therefore be taken into account through the EIA process. We would request that the ZTV is based on the height of the tallest structure of the Proposed Development.

7.2.24 – The potential effects of any proposed development at the western end of the runway, including the potential noise mitigation and relocated Fire Training Ground, should be considered.

7.3 – Ecology and Nature Conservation:

7.3.1 – For the avoidance of doubt, the Council would like to make clear that not all of the Mole Valley Local Plan 2000 policies listed as relevant to Ecology and Nature Conservation were saved following review of the 2000 Local Plan in 2007. Policies ENV9 and ENV10 were not saved and are therefore not applicable.

7.3.13 – The Scoping Report fails to refer to Sites of Nature Conservation Importance (SNCI), designated under Policy ENV12 of the Mole Valley Local Plan 2000 and Policy CS15 of the Mole Valley Core Strategy 2009. These sites are designated as they contain flora and fauna of county or regional value. They play a valuable role in nature conservation and should therefore be considered accordingly. The SNCIs within the 5km study area, available to view on the Council's Proposals Map, are:

- Withy Gill, Hookwood
- Edolph's Copse, Charlwood
- Rickett's Wood, Charlwood
- Pockmire's Wood and Beggar's Gill, Charlwood
- Leg of Mutton Wood / The Jordans, Newdigate
- Duke's Copse, Newdigate

- Newdigate Brickworks
- Hammond's Copse, Newdigate

7.3.14 – The potential impacts of the development on Priority Habitats and Species, as defined in the National Planning Policy Framework, should be fully assessed through the EIA process.

7.3.43 – The Proposed Development should provide biodiversity net gains in accordance with national policy set out in the 25 Year Environment Plan (2018).

7.5 – Water Environment:

7.5.1 – For the avoidance of doubt, the Council would like to make clear that not all of the Mole Valley Local Plan 2000 policies listed as relevant to the Water Environment were saved following review of the 2000 Local Plan in 2007. Policies ENV64 and ENV66 were not saved and are therefore not applicable.

7.5.17 – The suggested under-capacity in the pumping system and pollution storage lagoons in times of heavy rainfall must be addressed through the Proposed Development to ensure that no contaminated water enters the River Mole.

7.5.87 – The Council would suggest that the cumulative effects on water supply from the Proposed Development and other known development in the area are considered through the EIA. Furthermore, mitigation measures should be fully considered to reduce consumption and encourage greywater recycling.

7.6 – Traffic and Transport:

7.6.1 – For the avoidance of doubt, the Council would like to make clear that not all of the Mole Valley Local Plan 2000 policies listed as relevant to Traffic and Transport were saved following review of the 2000 Local Plan in 2007. Policy MOV1 was not saved and is therefore not applicable.

7.6.6 – Existing baseline conditions should also take account of the significant number of employees that work on-airport.

7.6.12 – The Council questions the Applicant's assertion that there is sufficient overall capacity in the rail network for Gatwick to continue to grow its rail mode share over the next decade. We would suggest that through the EIA, a full assessment of the rail network's capacity is undertaken to ensure that the growth in passenger throughput can be accommodated, as well as increasing rail mode share for access to the airport.

7.6.18 – The Applicant should also recognise the various other local highway network routes that provide access to the airport.

7.6.20 – The Council is concerned by the Applicant's apparent assumption that Highways England's M23 Smart Motorway improvement scheme will add spare capacity to the strategic network serving Gatwick. We are aware of Highways England's apparent concerns with the impacts on the strategic road network associated with the allocation of Horley Business Park and growth at Gatwick will only exacerbate this problem.

7.6.34 – The Council believes that all highway modelling and assessment should be undertaken prior to finalising the scoping area, as otherwise it is impossible to know which parts of the local highway network might require mitigation.

7.6.41 – The Council is concerned that the Area of Detailed Modelling (as shown in Figure 7.6.1) does not encompass a wide enough area. The boundary does not include large urban conurbations such as Brighton and Hove, Tunbridge Wells, Guildford and some areas of South London that should be included to fully understand the potential impacts on the highways network. To miss out these areas negates to include a significant proportion of the regional population that use the highways network.

7.7 – Air Quality:

7.7.21 – Pollutant concentration predictions must also consider and reflect the impact of the proposed replacement CARE facility.

7.7.23 – Sensitive receptors for air quality should also include airport users, passengers and employees.

7.7.24 – Air quality assessments should include direct links to the Health Impact Assessment, in order to understand the likely impacts on residents of any change to air quality surrounding the airport.

7.7.30 – Air quality assessments should clearly outline the split between emissions from airport related road traffic, and non-airport related traffic.

7.7.40 – The proposal to scope out pollutants other than NO_x, NO₂, PM₁₀ and PM_{2.5} is not supported, as the effects of any emissions from the replacement CARE facility should be assessed. The Applicant should also commit to monitoring of ultrafine particles around the airport in the future.

7.8 – Noise and Vibration:

7.8.8 – The Council believes that using summer 2018 noise contours as the baseline is insufficient, even if used alongside the Noise Preferential Routes. Gatwick Airport is at near capacity during the summer months on which these contours are based, whereas much of the growth of the airport will be achieved by peak spreading outside of the busiest periods (as per Diagram 4.5.1). It is therefore necessary to produce L_{den} and L_{night} contours that are based on flights year round and which therefore take into account flights outside the busy summer period. We therefore request that summer LAeq noise contours, year-round L_{den} and L_{night} contours and the Noise Preferential Routes are used as the baseline. Additionally, World Health Organisation guidelines should be taken into account and noise should therefore be modelled from 45dB L_{den} for average noise exposure, and 40dB L_{night} for night noise exposure.

7.8.24 – Whilst it is understood that the specific study area for noise and vibration effects cannot be determined until noise levels resulting from the development have been modelled, the Council would request that both the primary and secondary noise metrics are used to determine this area so that noise levels, frequency of noise events and increase in overflight are considered.

7.8.27 – Any likelihood in increase in the number of aircraft go-arounds should be assessed through the EIA, as these events can have great noise impacts on local communities.

7.8.27 – It is expected that much of the construction of the development will take place at night, the only period of relative quiet for residents near to the airport. A full assessment of the noise impacts from construction on local communities, as well as exploration of potential mitigation measures, is therefore necessary.

7.8.31 – When preparing N65 Day and N60 Night contours, all aircraft over the respective decibel noise level should be included, regardless of their altitude.

7.8.36 – The regular use of the Emergency Runway will bring departures 210 metres closer to communities to the north of the airport. The noise impact on these communities should be fully assessed as part of the EIA by modelling the noise footprint of departures of Code C aircraft from both runways in each runway direction.

7.8.40 – Reconfiguration of the Juliet taxiway and creation of end-around taxiways will bring taxiing aircraft closer to local communities. The potential noise impacts of this should be fully assessed, as well as the effectiveness of any mitigation measures proposed such as bunds. Similarly, an increase in the number of aircraft using Gatwick will bring an increase in maintenance and ground runs, likely in differing locations to present. The impact of this should be fully assessed against the present locations and frequency.

7.8.44 – An increase in cargo throughput at the airport will lead to an increase in heavy goods vehicle movements, of which the noise impact should be assessed as part of any road traffic noise assessments. Furthermore, the noise impacts of an increase in airport trips on rural roads must be assessed through the EIA process.

7.8.52 – The Council is of the opinion that LAeq contours should not be used to inform the areas eligible for mitigation, as these contours do not account for an increase in overflight and therefore do not accurately represent all of the residents and communities that are affected by aircraft noise. Instead, assessments should be undertaken in all areas overflown by aircraft associated with Gatwick.

7.9 – Climate Change and Carbon:

7.9.8 – The Government's commitment to achieving an emissions' reduction target of 100% by 2050, as set out in the Climate Change Act 2008 (2050 Target Amendment) Order 2019, should be considered.

7.10 – Socio-economic Effects:

7.10.1 – There is uncertainty as to the scale and location of future growth in the region beyond the timescale of current Local Plans. The EIA should therefore use a range of potential future growth scenarios, which include major strategic developments that are potentially forthcoming but not yet allocated in a development plan, to ensure that the necessary future infrastructure improvements are fully understood.

7.10.5 – The baseline conditions should include the existing number of employees and the predicted number of employees anticipated from the baseline scenario.

7.10.24 – The Applicant has proposed to scope out the effect of the development on the population during both construction and operational phases. The Council opposes this proposal; it is our belief that the increase in the number of on-airport jobs, as well as further indirect employment growth, has the potential to increase the demand for housing in the immediate locality to the airport. It is yet to be proven that a wide labour catchment area will see no significant impacts on population levels or housing and community infrastructure needs, and this should therefore be included in the scope of the EIA.

7.10.16 – The Applicant should assess the impacts of on-airport job generation on the local labour market. There is a concern that job growth at the airport could exacerbate the labour shortage of lower skilled workers in the local area and have negative consequences on other non-airport related employment sectors.

7.11 – Health and Wellbeing:

7.11.1 – For the avoidance of doubt, the Council would like to make clear that not all of the Mole Valley Local Plan 2000 policies listed as relevant to Health and Wellbeing were saved following review of the 2000 Local Plan in 2007. Policies REC2, REC7, REC8 and CF1 were not saved and are therefore not applicable.

7.13 – Waste:

7.13.1 – The emerging Surrey Waste Local Plan should be considered.

7.13.9 – Opportunities to reuse waste within the site should be explored.

7.14 – Major Accidents and Disasters:

7.14.47 – The Council is concerned that transport accidents on the runway, taxiway and apron, as well as in the air, have been scoped out of the EIA process. We believe the increased complexity of airfield operations expected from a two-runway configuration will increase the risk of such accidents and they should therefore be assessed accordingly.

Chapter 8 – Topics Proposed to be Scoped out of the EIA Process

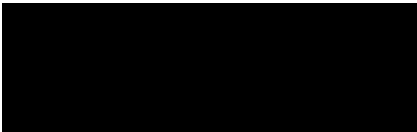
8.7 – Airspace Change Process:

8.7.3 – The Council understands that the redesign of airspace across London and the south east of England is part of a separate process called Future Airspace Strategy Implementation (FASI) South. However, where the DCO process runs in tandem with FASI South, it may be the case that information becomes available during the course of the EIA process that is relevant to the proposed development. The EIA process should therefore consider the impacts of indicative flight path designs – likely geographic areas and prototype routes that are likely to become operationally viable flight path options – as and when they become available, as well as any other relevant information that arises.

The Council awaits further engagement with the Applicant through topic working groups in due course and shall use this mechanism to raise any forthcoming issues that arise that have not been addressed in the EIA Scoping Report.

Please do not hesitate to contact us should you require any further information.

Yours faithfully,



Jack Straw
Executive Head of Service (Place & Environment)

Land and Acquisitions

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27th September 2019

Dear Sir / Madam

**Ref: Application by Gatwick Airport Limited (GAL) (the Applicant) for an Order granting Development Consent for the Gatwick Airport Northern Runway (the Proposed Development)
Scoping consultation**

This is a response on behalf of National Grid Electricity Transmission PLC (NGET) and National Grid Gas PLC (NGG).

I refer to your letter dated 3rd September 2019 regarding the Proposed Development.

Electricity Transmission

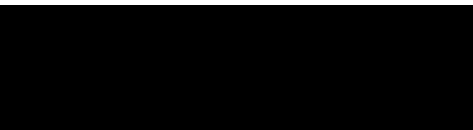
National Grid Electricity Transmission has no apparatus within or in close proximity to the proposed order limits.

Gas Transmission

National Grid Gas has no apparatus within or in close proximity to the proposed order limits.

If you require any further information, please do not hesitate to contact me.

Yours faithfully



**Anne Holdsworth
DCO Liaison Officer, Land and Acquisitions**



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27 September 2019

NATS Ref: **SG28651**

Sent via email: gatwickairport@planninginspectorate.gov.uk
cc: gal.safeguarding@gatwickairport.com

Dear Sirs,

TR020005 Gatwick Airport Northern Runway

I refer to the application referenced above, for alterations to Gatwick's 'Northern' or 'Standby' runway in order to enable dual runway operations.

The Project includes the following key components:

- *Alterations to the existing northern runway, including repositioning its centreline 12 metres further north to enable dual runway operations;*
- *Reconfiguration of taxiways;*
- *Pier and stand amendments (including a proposed new pier);*
- *Reconfiguration of other airfield facilities;*
- *Extensions to the North and South Terminals;*
- *Provision of additional hotel and office space;*
- *Provision of reconfigured car parking, including new surface and multi-storey car parks;*
- *Surface access (road and potential rail) improvements;*
- *Reconfiguration of existing utilities, including surface water, foul drainage and power; and*
- *Landscape/ecological planting and environmental mitigation.*

While changes to the current runway configuration at Gatwick do have the potential to cause an impact on air traffic services, including those provided by NATS, it is noted from the application documentation that any changes to flight paths will be regulated and assessed separately under the CAA's Airspace Change process.

As such, NATS only anticipates an impact upon its infrastructure, specifically the G10 PSR/SSR radar from any major construction which may be proposed on the airfield and in the vicinity of the radar itself.

In terms of any potential impact due to related development, sought either under the standard planning process or through permitted development rights, NATS is satisfied that this can be assessed and where relevant, mitigated under the standard technical safeguarding process. The technical safeguarding process which NATS works to in conjunction with Gatwick Airport, provides the mechanism for consultation and assessment of any airfield construction in order to protect the En-Route air traffic infrastructure.

Accordingly, NATS anticipates no undue impact from the runway alteration application in itself and therefore has no objections to raise.

I trust this clarifies our position; please acknowledge receipt of this letter.

Yours faithfully

A solid black rectangular redaction box covering the signature of Mr Sacha Rossi.

Mr Sacha Rossi

For and on behalf of NATS En-Route plc



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England

Environmental Hazards and
Emergencies Department
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Your Ref: TR020005-000008

Our Ref: 52039CIRIS

Mr Richard Kent
Senior EIA and land Rights Adviser
The Planning Inspectorate
Temple Quay House
2 The Square
Bristol BS1 6PN

30th September 2019

Dear Mr Kent

**Nationally Significant Infrastructure Project
Gatwick Airport Northern Runway
Scoping Consultation Stage**

Thank you for including Public Health England (PHE) in the scoping consultation phase of the above application. Advice offered by PHE is impartial and independent.

PHE exists to protect and improve the nation's health and wellbeing and reduce health inequalities; these two organisational aims are reflected in the way we review and respond to Nationally Significant Infrastructure Project (NSIP) applications.

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up, to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.

Having considered the submitted scoping report we wish to make the following specific comments and recommendations:

Environmental Public Health

We understand that the promoter will wish to avoid unnecessary duplication and that many issues including air quality, emissions to water, waste, contaminated land etc. will be covered elsewhere in the Environmental Statement (ES). We believe the summation of relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed mitigation measures, conclusions and residual impacts, relating to human health. Compliance with

the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.

In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. The attached appendix 1 summarises PHE's requirements and recommendations regarding the content of and methodology used in preparing the ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.

The following specific points have been noted in the proposed assessment methodology with respect to environmental public health:

- It is not clear in the application if the impact of increased train numbers on air quality during construction and operation would be assessed within the methodology. The application notes that *'Improvements to Gatwick Station are the subject of a separate consenting process, with a planning application submitted by Network Rail to Crawley Borough Council in April 2018 and consented in March 2019. These improvements are proposed to be operational prior to operation of the Project.'* We recommend that the increased rail usage is assessed alongside the development to understand potential cumulative impacts.
- The applicant notes that odours will not be assessed during construction. We recommend that this should only be scoped out once there is confirmation of no potential linkage to human health receptors.
- The application has scoped some accident scenarios out of the proposed assessment, considering that the threat is not considered to be higher than any of the existing airport operations. Whilst the threat may not increase, we consider that the magnitude of any accident scenario impact may increase owing to the increased number of people using and working at the proposed development. Further justification should be provided if these are to be scoped out of the proposed assessment.
- The assessment notes that the Control of Major Accident Hazards (COMAH) regulations are to be applied to the assessment. It is not clear whether the site contains any COMAH establishments and whether they are higher or lower tier. The impact of the proposed development on these establishments should be considered within the assessment.
- This project sits within the remit of the Airports National Policy Statement (NPS), which specifically refers to the need to assess the likely significant effects of the project on health in Section 4 (paragraphs 4.70–4.73). The NPS indicates that airport infrastructure development proposals can have both beneficial and adverse impacts on health and that the scale of development may have indirect impacts on health through a range of determinants. It also notes that more than one development may affect people simultaneously; as such, cumulative impacts on health should be given due consideration (para 4.73).
- We would like to draw your attention to the [International Health Regulations 2005](https://www.who.int/ihr/publications/PoE/en/) which states that the airport operator should review their provisions under the above legislation to ensure that adequate space and facilities are available to safely disembark, cohort and assess passengers in the event of a public health incident. This could be a situation such as passengers thought to be suffering from an infectious disease or a Chemical, Biological, Radiological or Nuclear (CBRN) incident. We recommend the airport operator considers the requirements in the core capacity document and spreadsheet published by the World Health Organization (WHO) which can be found here: <https://www.who.int/ihr/publications/PoE/en/>.

Furthermore the airport operator should ensure that there is a regularly tested and reviewed Public Health Emergency Contingency Plan in place and that in the event of an incident all staff are aware of the need for prompt communication with [PHE Surrey and Sussex](#).

Recommendation

Our position is that pollutants associated with road traffic and combustion e.g. airplane engines or movements, particularly particulate matter and oxides of nitrogen are non-threshold; i.e., an exposed population is likely to be subject to potential harm at any level and that reducing public exposures of non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards will have potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure), and maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental and health impact assessment, and development consent.

Noise

Detailed comment provided as Appendix 3.

Human Health and Wellbeing

This section of our response, identifies the wider determinants of health and wellbeing we expect the ES to address, to demonstrate whether they are likely to give rise to significant effects. We have focused its approach on scoping determinants of health and wellbeing under four themes, which have been derived from an analysis of the wider determinants of health mentioned in the National Policy Statements. The four themes are:

- Access
- Traffic and Transport
- Socioeconomic
- Land Use

We welcome the existing liaison arrangements with the Director of Public Health (DPH) and other local and national agencies. These local liaison arrangements should consider the potential opportunity for beneficial effects offered by the scheme as well as mitigation measures. We note the proposal to follow recognised Health Impact Assessment (HIA) methodology within the EIA process. Having considered the submitted PEIR PHE wish to make the following specific comments and recommendations:

Methodology

Mental health

The scoping report does not include a definition of health, such as that proposed by the World Health Organisation (WHO) and we would expect a specific reference to mental health. Mental well-being is fundamental to achieving a healthy, resilient and thriving population. It underpins healthy lifestyles, physical health, educational attainment, employment and productivity, relationships, community safety and cohesion and quality of life. A scheme of this scale and nature has impacts on the over-arching protective factors, which are:

- Enhancing control
- Increasing resilience and community assets
- Facilitating participation and promoting inclusion.

Scoping Recommendation

The ES should clearly set out a definition of health, such as that proposed by the World Health Organisation (WHO) and we would expect a specific reference to mental health. There should be

parity between mental and physical health, and any assessment of health impact should include the appreciation of both.

Monitoring

The scoping report states that monitoring will be reported within each chapter but does not identify the decision making process to identify what, when and why monitoring is to be undertaken.

Scoping Recommendation

We expect an assessment to include consideration of the need for monitoring and the ES should clearly state the principles on which the monitoring strategy has been established, including monitoring in response to unforeseen impacts or effects.

It may be appropriate to undertake monitoring where:

- Critical assumptions have been made in the absence of supporting evidence or data
- There is uncertainty about whether significant negative effects are likely to occur and it would be appropriate to include planned monitoring measures to track their presence, scale and nature.
- There is uncertainty about the potential success of mitigation measures
- It is necessary to track the nature of the impact or effect and provide useful and timely feedback that would allow action to be taken should negative effects occur

The monitoring strategy should set out:

- Monitoring methodologies
- Data sources
- Assessment methods
- Publication methodology
- Reporting frequency
- Temporal and geographic scope

The monitoring strategy should form part of the embedded mitigation measures within the DCO.

Vulnerable populations/ sensitive receptors

A detailed approach to the identification of sensitive receptors has not been provided and does not make links to the list of protected characteristics within an Equality Impact Assessment (EqIA). Any EqIA produced to support the application for the DCO Project should review the effects identified on human receptors, and consider if any would have the potential to be disproportionately or differentially experienced by groups with Protected Characteristics as defined by the Equality Act 2010.

The impacts on health and wellbeing and health inequalities of the scheme may have particular effects on vulnerable or sensitive populations, including those that fall within the list of protected characteristics. The Environmental Statement and any Equalities Impact Assessment should not be completely separated.

Scoping Recommendation

The assessments and findings of the ES and any Equality Impact Assessment should be cross referenced between the two documents, particularly to ensure the comprehensive assessment of potential impacts for health and inequalities and where resulting mitigation measures are mutually supportive.

The final ES must identify additional mitigation measures identified as necessary in connection to vulnerable populations and those within the protected characteristics.

Temporal scope and reporting

The scale and nature of the proposed development results in the need for very clear reporting on the temporal impacts and effects on the local population. In this context “temporary” impacts can extend over long periods. The scoping report does not identify how the temporal scope of impacts will be determined.

Recommendation

The reporting within the PEIR/ES should use clearly defined definitions of temporary, rather than generic temporary or permanent temporal descriptions. This is to ensure a consistent, transparent and accurate approach to the report.

Physical activity and active travel

The report identifies how non-motorised user (NMU) will be impacted through the loss or change in formal Public Rights of Way (PRoW), open space and the existing road network. Active travel forms an important part in helping to promote healthy weight environments and as such it is important that any changes have a positive long term impact where possible. Changes to NMU routes have the potential to impact on usage, create displacement to other routes and potentially lead to increased road traffic collisions.

A scheme of this scale and nature can also provide opportunities to enhance the existing infrastructure that supports active travel and we expect the proposal to contribute to improved provision for active travel and physical activity, particularly with reference to the ambitions within the Airports National Policy Statement (ANPS) Para 5.17 for walking, cycling and the use of public transport.

Scoping Recommendations

The overall risk to NMU and impact on active travel should be considered on a case-by-case basis, taking into account, the number and type of users and the effect that the temporary traffic management system will have on their journey and safety.

Any traffic counts and traffic assessment should, as far as reasonably practicable, identify informal routes used by NMU or potential routes used due to displacement, as well as established or formal routes.

The final ES should identify the temporary traffic management system design principles or standards that will be maintained with specific reference to NMU. This may be incorporated within the Code of Construction Practice.

The scheme should continue to identify any additional opportunities to contribute to improved infrastructure provision for active travel and physical activity.

Community severance

It is unclear in the scoping report if and where community severance will be considered. The traffic and transport assessment includes a specific reference to severance affecting highway users and residents from places of employment.

Community severance occurs when transport infrastructure for road, rail or air travel and/or its use creates barriers within a community or between communities. The barriers can be physical, resulting from the construction of infrastructure, or psychological, resulting from individual perceptions of the

infrastructure in operation, for example, a large volume of traffic, poor air quality and high levels of noise. Community severance can affect other determinants of health such as access to local public and key services and facilities and community or social cohesion and access to social networks. Some groups of people in the community, such as people with limited mobility, may be more affected by community severance than others.

Scoping Recommendation

The ES should consider the impact of the development on community severance from changes to the transport infrastructure and usage within both the construction and operational phases

Housing affordability and supply

The scoping report identifies a significant proportion of social or private rented sector housing within the local communities. The presence of significant numbers of workers (700-2000) could foreseeably have an impact on the local availability of affordable housing, particularly that of short term tenancies, for certain communities. These residents will have the least capacity to respond to change (for example, where there may be an overlap between construction workers seeking accommodation in the private rented sector, and people in receipt of housing benefit seeking the same lower-cost accommodation).

Scoping Recommendation

Demand for temporary accommodation by the construction work force should be identified and an assessment made regarding the impact on local housing supply and affordability, particularly in relation to homelessness provision of short term housing supply. Given the number of other large developments near the study area the cumulative impact on housing provision should be included.

Employment

The report outlines aims to support delivery of work-skills training, new jobs and apprenticeships. This support should be available for local people, including young people leaving care and people with disabilities, to enter into sustainable employment.

There is clear evidence that good work improves health and wellbeing across people's lives and protects against social exclusion. Conversely, unemployment is bad for health and wellbeing, as it is associated with an increased risk of mortality and morbidity. For many individuals, in particular those with long-term conditions such as mental health problems, musculoskeletal (MSK) conditions and disabilities, health issues can be a barrier to gaining and retaining employment. Employment rates are lowest among disabled people, with only 51.3% in work, meaning there is a substantial employment rate gap in the UK between disabled and non-disabled people (81.4% in employment). Among these working age disabled people in the UK, 54% have a mental health or MSK condition as their main health condition(1). Enabling people with health issues to obtain or retain work, and be productive within the workplace, is a crucial part of the economic success and wellbeing of every community and industry.

Therefore, it is important that people are supported to gain employment and maintain economic independence for themselves and their families, especially as they age. This is of particular importance for individuals with long-term conditions and disabilities, due to the barriers they face in gaining employment and retaining a job.

¹ [PHE \(Jan 2019\). Guidance - Health matters: health and work](#)

Recommendations

The ES should identify a clear strategy and action plan that addresses barriers to employment within the local population and enables opportunity for employment within Gatwick Airport.

Impact on health and social care

Local health care services are likely to experience additional demand from the increase in passenger numbers from the current 46 MPPA to 74MPPA by 2038, in addition to the presence of the construction workforce. The report does not consider the impact on local primary health care, acute services and emergency responders from these additional passenger movements. These need to be adequately quantified to establish a baseline and future demand. Some funding streams are based on resident population only.

The report does not identify specific issues related to unaccompanied children arriving at Gatwick. The upper tier authority will have the statutory responsibility where they first present on entry to the UK. An unaccompanied child is entitled to the same support as any other looked after child. When unaccompanied children arrive on inbound flights the local authority has a duty to assess such children and provide support. The increase in passenger movements will have a proportionate increase in service demand subject to changes in the proportion of international flights and border control procedures.

Scoping Recommendations

The ES should assess the current and future demand on health and social care services and the subsequent assessment of significance as a result of the DCO. The ES should report on the results of engagement with the local health and social care system and any proposed embedded or additional mitigation.

The geographic scope of the assessment should include areas where health and social care facilities or services may experience additional demand as a result of the DCO.

Yours sincerely

For and on behalf of Public Health England
nsipconsultations@phe.gov.uk

Please mark any correspondence for the attention of National Infrastructure Planning Administration.

Appendix 1: PHE recommendations regarding the scoping document

Introduction

The Planning Inspectorate's Advice Note 11: Working with Public Bodies covers many of the generic points of interaction relevant to the Planning Inspectorate and Public Health England (PHE). The purpose of this Annex is to help applicants understand the issues that PHE expect to see addressed by applicants preparing an Environmental Statement (ES) as part of their Nationally Significant Infrastructure Planning (NSIP) submission.

We have included a comprehensive outline of the type of issues we would expect to be considered as part of an NSIP which falls under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations). PHE encourages applicants to contact us as early in the process as possible if they wish to discuss or clarify any matters relating to chemical, poison, radiation or wider public health.

General Information on Public Health England

PHE was established on 1 April 2013 to bring together public health specialists from more than 70 organisations into a single public health service. We are an executive agency of the Department of Health and are a distinct delivery organisation with operational autonomy to advise and support government, local authorities and the National Health Service (NHS) in a professionally independent manner.

We operate from 8 local centres, plus an integrated region and centre for London, and 4 regions (North of England, South of England, Midlands and East of England, and London). We work closely with public health professionals in Wales, Scotland and Northern Ireland, and internationally.² We have specialist teams advising on specific issues such as the potential impacts of chemicals, air quality, ionising and non-ionising radiation and other factors which may have an impact on public health, as well as on broader issues such as the wider determinants of health, health improvement and health inequalities.

PHE's NSIP related roles and responsibilities and geographical extent

PHE is a statutory consultee in the NSIP process for any *applications likely to involve chemicals, poisons or radiation which could potentially cause harm to people and are likely to affect significantly public health*.³ PHE will consider the potential significant effects (direct and indirect) of a proposed development on population and human health and the impacts from chemicals, radiation and environmental hazards.

Under certain circumstances PHE may provide comments on ionising radiation to/on behalf of the Scottish Parliament. If a proposer is submitting a planning application in Scotland which may require advice on radiation you are recommended to contact the appropriate Scottish Planning Authority for advice on how to proceed.

In the case of applications in Wales, PHE remains a statutory consultee but the regime applies to a more limited range of development types. For NSIP applications likely to affect land in Wales, an applicant should still consult PHE but, additionally will be required to consult the Welsh Ministers.

Role of Public Health England and NSIP with respect to Environmental Impact Assessments

PHE has a statutory role as a consultation body under the EIA Regulations. Where an applicant has requested a scoping opinion from the Planning Inspectorate⁴ in relation to a proposed NSIP, PHE will be consulted by the Planning Inspectorate about the scope, and level of detail, of the information to be provided in the ES and will be under a duty to make information available to the applicant. PHE's standard recommendations in response to EIA scoping consultations are below.

² <https://www.gov.uk/government/organisations/public-health-england/about#priorities>

³ The Infrastructure Planning (Interested Parties and Miscellaneous Prescribed Provisions) Regulations 2015

⁴ The scoping process is administered and undertaken by the Planning Inspectorate on behalf of the Secretary of State

PHE also encourages applicants to discuss with them the scope of the ES at an early stage to explore, for example, whether careful site selection or other design issues could minimise or eliminate public health impacts or to outline the requirement for, scope and methodology of any assessments related to public health.

PHE's recommendations to applicants regarding Environmental Impact Assessments General approach

Applicants are reminded that Section 5(2)(a) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 specifically includes a requirement that the EIA must identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the proposed development on population and human health.

PHE is of the opinion that this requirement encompasses the wider determinants of public health, as well as chemicals, poisons and radiation. Further information on PHE's recommendations and requirements is included below.

It is the role of the applicant to prepare the ES. PHE provides advice relating to EIA within this document and during the NSIP consultation stages.

When preparing an ES the applicant should give consideration to best practice guidance such as the Government's Handbook for scoping projects: environmental impact assessment⁵, IEMA Guide to Delivering Quality Developments⁶, and Guidance: on Environmental Impact Assessment⁷

The Planning Inspectorate's Advice Note Seven: Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements also provide guidance to applicants and other persons with interest in the EIA process as it relates to NSIPs.

It is important that the submitted ES identifies and assesses the potential public health impacts of the activities at, and emissions from, the development.

PHE understands that there may be separate sections of the ES covering the assessment of impacts on air, land, water and so on, but expects an ES to include a specific section summarising potential impacts on population and health. This section should bring together and interpret the information from other assessments as necessary. The health and population impacts section should address the following steps.

1. Screening: Identify and significant effects.
 - a. Summarise the methodologies used to identify health impacts, assess significance and sources of information
 - b. Evaluate any reference standards used in carrying out the assessment and in evaluating health impacts (e.g., environmental quality standards)
 - c. Where the applicant proposes the 'scoping out' of any effects a clear rationale and justification should be provided along with any supporting evidence.

2. Baseline Survey:
 - a. Identify information needed and available, Evaluate quality and applicability of available information
 - b. Undertake assessment

⁵ <https://www.gov.uk/government/publications/handbook-for-scoping-projects-environmental-impact-assessment>

⁶ <https://www.iema.net/assets/newbuild/documents/Delivering%20Quality%20Development.pdf>

⁷ <https://www.gov.uk/guidance/environmental-impact-assessment#the-purpose-of-environmental-impact-assessment>

3. Alternatives:
 - a. Identify and evaluate any realistic alternative locations, routes, technology etc.
4. Design and assess possible mitigation
 - a. Consider and propose suitable corrective actions should mitigation measures not perform as effectively predicted.
5. Impact Prediction: Quantify and Assess Impacts:
 - a. Evaluate and assess the extent of any positive and negative effects of the development. Effects should be assessed in terms of likely health outcomes, including those relating to the wider determinants of health such as socio-economic outcomes, in addition to health outcomes resulting from exposure to environmental hazards. Mental health effects should be included and given equivalent weighting to physical effects.
 - b. Clearly identify any omissions, uncertainties and dependencies (e.g., air quality assessments being dependant on the accuracy of traffic predictions)
 - c. Evaluate short-term impacts associated with the construction and development phase
 - d. Evaluate long-term impacts associated with the operation of the development
 - e. Evaluate any impacts associated with decommissioning
 - f. Evaluate any potential cumulative impacts as a result of the development, currently approved developments which have yet to be constructed, and proposed developments which do not currently have development consent
6. Monitoring and Audit (not a statutory requirement)
 - a. Identify key modelling predictions and mitigation impacts and consider implementing monitoring and audit to assess their accuracy / effectiveness.

Any assessments undertaken to inform the ES should be proportionate to the potential impacts of the proposal, therefore we accept that, in some circumstances particular assessments may not be relevant to an application, or that an assessment may be adequately completed using a qualitative rather than quantitative methodology. In cases where this decision is made, the applicant should fully explain and justify their rationale in the submitted documentation.

Consideration of alternatives (including alternative sites, choice of process, and the phasing of construction) is widely regarded as good practice. Ideally, the EIA process should start at the stage of site selection, so that the environmental merits of practicable alternatives can be properly considered. Where this is undertaken, the main alternatives considered should be outlined in the ES⁸.

Human and environmental receptors

The applicant should clearly identify the development's location and the location and distance from the development of off-site human receptors that may be affected by emissions from, or activities at, the development. Off-site human receptors may include people living in residential premises; people working in commercial, and industrial premises and people using transport infrastructure (such as roads and railways), recreational areas, and publicly-accessible land.

Identify and consider impacts on residential areas and sensitive receptors (such as schools, nursing homes and healthcare facilities, as well as other vulnerable population groups such as those who are young, older, with disabilities or long-term conditions, or on low incomes) in the area(s) which may be affected by emissions, this should include consideration of any new receptors arising from future development

⁸ DCLG guidance, 1999 <http://www.communities.gov.uk/documents/planningandbuilding/pdf/155958.pdf>

Consideration should also be given to environmental receptors such as the surrounding land, watercourses, surface and groundwater, and drinking water supplies such as wells, boreholes and water abstraction points.

Impacts arising from construction and decommissioning

Any assessment of impacts arising from emissions or activities due to construction and decommissioning should consider potential impacts on all receptors and describe monitoring and mitigation during these phases. Construction and decommissioning will be associated with vehicle movements and cumulative impacts should be accounted for.

We would expect the applicant to follow best practice guidance during all phases from construction to decommissioning to ensure appropriate measures are in place to mitigate any potential negative impact on health from emissions (point source, fugitive and traffic-related) and activities. An effective Construction Environmental Management Plan (CEMP) (and Decommissioning Environmental Management Plan (DEMP)) will help provide reassurance that activities are well managed. The applicant should ensure that there are robust mechanisms in place to respond to any complaints made during construction, operation, and decommissioning of the facility.

Emissions to air and water

Significant impacts are unlikely to arise from industrial installations which employ Best Available Techniques (BAT) and which meet regulatory requirements concerning emission limits and design parameters. However, PHE has a number of comments regarding the assessment of emissions from any type of development in order that the ES provides a comprehensive assessment of potential impacts.

When considering a baseline (of existing environmental quality) and in the assessment and future monitoring of impacts these should:

- include appropriate screening assessments and detailed dispersion modelling where this is screened as necessary
- encompass the combined impacts of all pollutants which may be emitted by the development with all pollutants arising from associated development and transport, considered in a single holistic assessment (ie, of overall impacts)
- include Chemical Abstract Service (CAS) numbers alongside chemical names, where referenced in the ES
- consider the construction, operational, and decommissioning phases
- consider the typical operational emissions and emissions from start-up, shut-down, abnormal operation and accidents when assessing potential impacts and include an assessment of worst-case impacts
- fully account for fugitive emissions
- include appropriate estimates of background levels
 - when assessing the human health risk of a chemical emitted from a facility or operation, background exposure to the chemical from other sources should be taken into account
- identify cumulative and incremental impacts (ie, assess cumulative impacts from multiple sources), including those arising from associated development, other existing and proposed development in the local area, and new vehicle movements associated with the proposed development; associated transport emissions should include consideration of non-road impacts (ie, rail, sea, and air)
- include consideration of local authority, Environment Agency, Natural Resources Wales, Defra national network, and any other local site-specific sources of monitoring data
- compare predicted environmental concentrations to the applicable standard or guideline value for the affected medium. Where available, the most recent UK standards for the appropriate media (ie, air, water, and/or soil) and health-based guideline values should be used when quantifying the risk to human health from chemical pollutants
- where UK standards or guideline values are not available, use those recommended by the European Union or World Health Organization:

- If no standard or guideline value exists, the predicted exposure to humans should be estimated and compared to an appropriate health-based value (eg, a Tolerable Daily Intake or equivalent)
- This should consider all applicable routes of exposure (eg, include consideration of aspects such as the deposition of chemicals emitted to air and their uptake via ingestion)
- when quantitatively assessing the health risk of genotoxic and carcinogenic chemical pollutants, PHE does not favour the use of mathematical models to extrapolate from high dose levels used in animal carcinogenicity studies to well below the observed region of a dose-response relationship. When only animal data are available, we recommend that the 'Margin of Exposure' (MOE) approach¹ is used
- identify and consider impacts on residential areas and sensitive receptors (such as schools, nursing homes and healthcare facilities) in the area(s) which may be affected by emissions. This should include consideration of any new receptors arising from future development

Whilst screening of impacts using qualitative methodologies is common practice (eg, for impacts arising from fugitive emissions such as dust), where it is possible to undertake a quantitative assessment of impacts then this should be undertaken.

PHE's view is that the applicant should appraise and describe the measures that will be used to control both point source and fugitive emissions and demonstrate that standards, guideline values or health-based values will not be exceeded due to emissions from the installation, as described above. This should include consideration of any emitted pollutants for which there are no set emission limits. When assessing the potential impact of a proposed installation on environmental quality, predicted environmental concentrations should be compared to the permitted concentrations in the affected media; this should include both standards for short and long-term exposure. Further to assessments of compliance with limit values, for non-threshold pollutants (ie, those that have no threshold below which health effects do not occur) the **benefits** of development options which reduce population exposure should be evaluated.

Additional points specific to emissions to air

When considering baseline conditions (of existing air quality) and the assessment and future monitoring of impacts, these should include:

- consideration of impacts on existing areas of poor air quality e.g. existing or proposed local authority Air Quality Management Areas (AQMAs)
- modelling using appropriate meteorological data (i.e. come from the nearest suitable meteorological station and include a range of years and worst-case conditions)
- modelling taking into account local topography, congestion and acceleration
- evaluation of the public health **benefits** of development options which reduce air pollution – even below limit values – as pollutants such as nitrogen dioxide and particulate matter show no threshold below which health effects do not occur

Additional points specific to emissions to water

When considering baseline conditions (of existing water quality) and the assessment and future monitoring of impacts, these should:

- include assessment of potential impacts on human health and not focus solely on ecological impacts
- identify and consider all routes by which emissions may lead to population exposure (e.g., surface watercourses, recreational waters, sewers, geological routes etc.)
- assess the potential off-site effects of emissions to groundwater (eg, on aquifers used for drinking water) and surface water (used for drinking water abstraction) in terms of the potential for population exposure
- include consideration of potential impacts on recreational users (eg, from fishing, canoeing etc.) alongside assessment of potential exposure via drinking water

Land quality

We would expect the applicant to provide details of any hazardous contamination present on site (including ground gas) as part of a site condition report.

Emissions to and from the ground should be considered in terms of the previous history of the site and the potential of the site, once operational, to give rise to issues. Public health impacts associated with ground contamination and/or the migration of material off-site should be assessed⁹ and the potential impact on nearby receptors and control and mitigation measures should be outlined.

Relevant areas outlined in the Government's Good Practice Guide for EIA include:

- effects associated with ground contamination that may already exist
- effects associated with the potential for polluting substances that are used (during construction / operation) to cause new ground contamination issues on a site, for example introducing / changing the source of contamination
- impacts associated with re-use of soils and waste soils, for example, re-use of site-sourced materials on-site or offsite, disposal of site-sourced materials offsite, importation of materials to the site, etc.

Waste

The applicant should demonstrate compliance with the waste hierarchy (e.g. with respect to re-use, recycling or recovery and disposal).

For wastes arising from the development the ES should assess:

- the implications and wider environmental and public health impacts of different waste disposal options
- disposal route(s) and transport method(s) and how potential impacts on public health will be mitigated

If the development includes wastes delivered to the installation:

- Consider issues associated with waste delivery and acceptance procedures (including delivery of prohibited wastes) and should assess potential off-site impacts and describe their mitigation

Other aspects

Within the ES, PHE would expect to see information about how the applicant would respond to accidents with potential off-site emissions (e.g., flooding or fires, spills, leaks or releases off-site). Assessment of accidents should: identify all potential hazards in relation to construction, operation and decommissioning; include an assessment of the risks posed; and identify risk management measures and contingency actions that will be employed in the event of an accident in order to mitigate off-site effects.

PHE would expect the applicant to consider the COMAH Regulations (Control of Major Accident Hazards) and the Major Accident Off-Site Emergency Plan (Management of Waste from Extractive Industries) (England and Wales) Regulations: both in terms of their applicability to the development itself, and the development's potential to impact on, or be impacted by, any nearby installations themselves subject to these Regulations.

There is evidence that, in some cases, perception of risk may have a greater impact on health than the hazard itself. A 2009 report¹⁰, jointly published by Liverpool John Moores University and the Health Protection Agency (HPA), examined health risk perception and environmental problems using a number of case studies. As a point to consider, the report suggested: *"Estimation of community anxiety and stress should be included as part of every risk or impact assessment of proposed plans that involve a potential environmental hazard. This is true even when the physical*

⁹ Following the approach outlined in the section above dealing with emissions to air and water i.e. comparing predicted environmental concentrations to the applicable standard or guideline value for the affected medium (such as Soil Guideline Values)

¹⁰ Available from: <http://www.cph.org.uk/wp-content/uploads/2012/08/health-risk-perception-and-environmental-problems--summary-report.pdf>

health risks may be negligible." PHE supports the inclusion of this information within ES' as good practice.

Electromagnetic fields (EMF)

This advice relates to electrical installations such as substations and connecting underground cables or overhead lines. PHE advice on the health effects of power frequency electric and magnetic fields is available on the Gov.UK website.¹¹

There is a potential health impact associated with the electric and magnetic fields around substations, overhead power lines and underground cables. The field strengths tend to reduce with distance from such equipment.

The following information provides a framework for considering the health impact associated with the electric and magnetic fields produced by the proposed development, including the direct and indirect effects of the electric and magnetic fields as indicated above.

Policy Measures for the Electricity Industry

A voluntary code of practice is published which sets out key principles for complying with the ICNIRP guidelines.¹²

Companion codes of practice dealing with optimum phasing of high voltage power lines and aspects of the guidelines that relate to indirect effects are also available.^{13, 14}

Exposure Guidelines

PHE recommends the adoption in the UK of the EMF exposure guidelines published by the International Commission on Non-ionizing Radiation Protection (ICNIRP). Formal advice to this effect, based on an accompanying comprehensive review of the scientific evidence, was published in 2004 by the National Radiological Protection Board (NRPB), one of PHE's predecessor organisations¹⁵

Updates to the ICNIRP guidelines for static fields have been issued in 2009 and for low frequency fields in 2010. However, Government policy is that the ICNIRP guidelines are implemented as expressed in the 1999 EU Council Recommendation on limiting exposure of the general public (1999/519/EC):¹⁶

Static magnetic fields

For static magnetic fields, the ICNIRP guidelines published in 2009 recommend that acute exposure of the general public should not exceed 400 mT (millitesla), for any part of the body, although the previously recommended value of 40 mT is the value used in the Council Recommendation. However, because of potential indirect adverse effects, ICNIRP recognises that practical policies need to be implemented to prevent inadvertent harmful exposure of people with implanted electronic medical devices and implants containing ferromagnetic materials, and injuries due to flying ferromagnetic objects, and these considerations can lead to much lower restrictions, such as 0.5 mT.

Power frequency electric and magnetic fields

¹¹ <https://www.gov.uk/government/collections/electromagnetic-fields#low-frequency-electric-and-magnetic-fields>

¹² https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/37447/1256-code-practice-emf-public-exp-guidelines.pdf

¹³ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/48309/1255-code-practice-optimum-phasing-power-lines.pdf

¹⁴ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/224766/powerlines_vcop_microshocks.pdf

¹⁵ <http://webarchive.nationalarchives.gov.uk/20140629102627/http://www.hpa.org.uk/Publications/Radiation/NPRBArchive/DocumentsOfTheNRPB/Absd1502/>

¹⁶ http://webarchive.nationalarchives.gov.uk/+www.dh.gov.uk/en/PublicHealth/Healthprotection/DH_4089500

At 50 Hz, the known direct effects include those of induced currents in the body on the central nervous system (CNS) and indirect effects include the risk of painful spark discharge on contact with metal objects exposed to electric fields. The ICNIRP guidelines published in 1998 give reference levels for public exposure to 50 Hz electric and magnetic fields, and these are respectively 5 kV m⁻¹ (kilovolts per metre) and 100 µT (microtesla). The reference level for magnetic fields changes to 200 µT in the revised (ICNIRP 2010) guidelines because of new basic restrictions based on induced electric fields inside the body, rather than induced current density. If people are not exposed to field strengths above these levels, direct effects on the CNS should be avoided and indirect effects such as the risk of painful spark discharge will be small. The reference levels are not in themselves limits but provide guidance for assessing compliance with underlying basic restrictions and reducing the risk of indirect effects.

Long term effects

There is concern about the possible effects of long-term exposure to electromagnetic fields, including possible carcinogenic effects at levels much lower than those given in the ICNIRP guidelines. In the NRPB advice issued in 2004, it was concluded that the studies that suggest health effects, including those concerning childhood leukaemia, could not be used to derive quantitative guidance on restricting exposure. However, the results of these studies represented uncertainty in the underlying evidence base, and taken together with people's concerns, provided a basis for providing an additional recommendation for Government to consider the need for further precautionary measures, particularly with respect to the exposure of children to power frequency magnetic fields.

The Stakeholder Advisory Group on ELF EMFs (SAGE)

The Stakeholders Advisory Group on ELF EMFs (SAGE) was set up to explore the implications for a precautionary approach to extremely low frequency electric and magnetic fields (ELF EMFs), and to make practical recommendations to Government:¹⁷

Relevant here is SAGE's 2007 First Interim Assessment, which makes several recommendations concerning high voltage power lines. Government supported the implementation of low cost options such as optimal phasing to reduce exposure; however it did not support the option of creating corridors around power lines in which development would be restricted on health grounds, which was considered to be a disproportionate measure given the evidence base on the potential long term health risks arising from exposure. The Government response to SAGE's First Interim Assessment is available on the national archive website.¹⁸

The Government also supported calls for providing more information on power frequency electric and magnetic fields, which is available on the PHE web pages.

Ionising radiation

Particular considerations apply when an application involves the possibility of exposure to ionising radiation. In such cases it is important that the basic principles of radiation protection recommended by the International Commission on Radiological Protection¹⁹ (ICRP) are followed. PHE provides advice on the application of these recommendations in the UK. The ICRP recommendations are implemented in the Euratom Basic Safety Standards²⁰ (BSS) and these form the basis for UK legislation, including the Ionising Radiation Regulations 1999, the Radioactive Substances Act 1993, and the Environmental Permitting Regulations 2016.

¹⁷ <http://www.emfs.info/policy/sage/>

¹⁸

http://webarchive.nationalarchives.gov.uk/20130107105354/http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_107124

¹⁹ These recommendations are given in publications of the ICRP notably publications 90 and 103 see the website at <http://www.icrp.org/>

²⁰ Council Directive 96/29/EURATOM laying down basic safety standards for the protection of the health of workers and the general public against the dangers arising from ionising radiation.

As part of the EIA process PHE expects applicants to carry out the necessary radiological impact assessments to demonstrate compliance with UK legislation and the principles of radiation protection. This should be set out clearly in a separate section or report and should not require any further analysis by PHE. In particular, the important principles of justification, optimisation and radiation dose limitation should be addressed. In addition compliance with the Euratom BSS and UK legislation should be clear.

When considering the radiological impact of routine discharges of radionuclides to the environment PHE would, as part of the EIA process, expect to see a full radiation dose assessment considering both individual and collective (population) doses for the public and, where necessary, workers. For individual doses, consideration should be given to those members of the public who are likely to receive the highest exposures (referred to as the representative person, which is equivalent to the previous term, critical group).

Different age groups should be considered as appropriate and should normally include adults, 1 year old and 10 year old children. In particular situations doses to the fetus should also be calculated²¹.

The estimated doses to the representative person should be compared to the appropriate radiation dose criteria (dose constraints and dose limits), taking account of other releases of radionuclides from nearby locations as appropriate. Collective doses should also be considered for the UK, European and world populations where appropriate.

The methods for assessing individual and collective radiation doses should follow the guidance given in 'Principles for the Assessment of Prospective Public Doses arising from Authorised Discharges of Radioactive Waste to the Environment August 2012'²²

It is important that the methods used in any radiological dose assessment are clear and that key parameter values and assumptions are given (for example, the location of the representative persons, habit data and models used in the assessment).

Any radiological impact assessment, undertaken as part of the EIA, should also consider the possibility of short-term planned releases and the potential for accidental releases of radionuclides to the environment. This can be done by referring to compliance with the Ionising Radiation Regulations and other relevant legislation and guidance.

The radiological impact of any solid waste storage and disposal should also be addressed in the assessment to ensure that this complies with UK practice and legislation; information should be provided on the category of waste involved (e.g. very low level waste, VLLW). It is also important that the radiological impact associated with the decommissioning of the site is addressed.

Of relevance here is PHE advice on radiological criteria and assessments for land-based solid waste disposal facilities²³. PHE advises that assessments of radiological impact during the operational phase should be performed in the same way as for any site authorised to discharge radioactive waste. PHE also advises that assessments of radiological impact during the post operational phase of the facility should consider long timescales (possibly in excess of 10,000 years) that are appropriate to the long-lived nature of the radionuclides in the waste, some of which may have half-lives of millions of years.

²¹ HPA (2008) Guidance on the application of dose coefficients for the embryo, fetus and breastfed infant in dose assessments for members of the public. Doc HPA, RCE-5, 1-78, available at

<https://www.gov.uk/government/publications/embryo-fetus-and-breastfed-infant-application-of-dose-coefficients>

²² The Environment Agency (EA), Scottish Environment Protection Agency (SEPA), Northern Ireland Environment Agency, Health Protection Agency and the Food Standards Agency (FSA).

Principles for the Assessment of Prospective Public Doses arising from Authorised Discharges of Radioactive Waste to the Environment August 2012.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/296390/geho1202bklh-e-e.pdf

²³ HPA RCE-8, Radiological Protection Objectives for the Land-based Disposal of Solid Radioactive Wastes, February 2009

The radiological assessment should consider exposure of members of hypothetical representative groups for a number of scenarios including the expected migration of radionuclides from the facility, and inadvertent intrusion into the facility once institutional control has ceased.

For scenarios where the probability of occurrence can be estimated, both doses and health risks should be presented, where the health risk is the product of the probability that the scenario occurs, the dose if the scenario occurs and the health risk corresponding to unit dose.

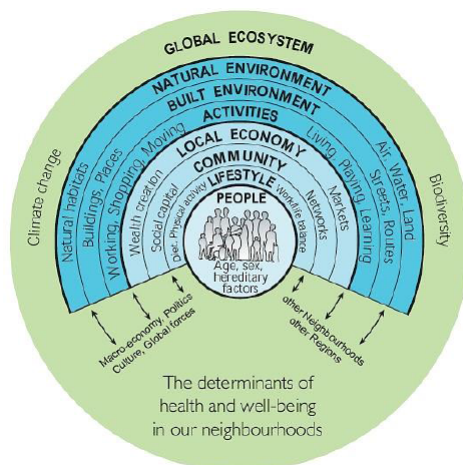
For inadvertent intrusion, the dose if the intrusion occurs should be presented. It is recommended that the post-closure phase be considered as a series of timescales, with the approach changing from more quantitative to more qualitative as times further in the future are considered.

The level of detail and sophistication in the modelling should also reflect the level of hazard presented by the waste. The uncertainty due to the long timescales means that the concept of collective dose has very limited use, although estimates of collective dose from the 'expected' migration scenario can be used to compare the relatively early impacts from some disposal options if required.

Wider Determinants of Health

World Health Organization (WHO's) defines health as "a state of complete physical, mental and social well-being and not merely an absence of disease or infirmity" (WHO, 1948).

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up, to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people.



Barton and Grant²⁴

PHE recognises that evaluating an NSIP's impacts on health through the wider determinants is more complex than assessing a project's direct impacts against clearly defined regulatory protections (e.g. protected species). However, this does not mean that their assessment should be side-lined; with the 2017 EIA Regulations clarifying that the likely significant effects of a development proposal on human health must be assessed.

We accept that the relevance of these topics and associated impacts will vary depending on the nature of the proposed development and in order to assist applicants PHE has focused its approach on scoping determinants of health and wellbeing under four themes, which have been derived from

²⁴ Barton H, Grant M. A health map for the local human habitat. The Journal of the Royal Society for the Promotion of Health 2006; 126(6): 252-3.

an analysis of the wider determinants of health mentioned in the National Policy Statements. PHE has developed a list of 21 determinants of health and wellbeing under four broad themes, which have been derived from an analysis of the wider determinants of health mentioned in the National Policy Statements (NPS). If the applicant proposes to scope any areas out of the assessment, they should provide clear reasoning and justification.

The four themes are:

- Access
- Traffic and Transport
- Socioeconomic
- Land Use

Methodology

PHE will expect assessments to set out the methodology used to assess each determinant included in the scope of the assessment. In some instances, the methodologies described may be established and refer to existing standards and/or guidance. In other instances, there may be no pre-defined methodology, which can often be the case for the wider determinants of health; as such there should be an application of a logical impact assessment method that:

- identifies effected populations vulnerable to impacts from the relevant determinant
- establishes the current baseline situation
- identifies the NSIP's potential direct and indirect impacts on each population
- if impacts are identified, evaluates whether the potential impact is significant in relation to the affected population
- identifies appropriate mitigation to minimise impacts or the subsequent effects on health
- identifies opportunities to achieve benefits from the scheme
- identifies appropriate monitoring programmes

Currently there is no standard methodology for assessing the population and human health effects of infrastructure projects, but a number of guides exist, including:

- Institute of Environmental Management and Assessment, 2017: Health in Environmental Assessment, a primer for a proportionate approach;
- NHS London Healthy Urban Development Unit (HUDU), 2015. Healthy Urban Planning Checklist and Rapid Health Impact Assessment Tool;
- Wales Health Impact Assessment Unit, 2012: HIA a practical guide;
- National Mental Wellbeing Impact Assessment Development Unit 2011: Mental Wellbeing Impact Assessment Toolkit;

Determining significant effects

Neither the EIA regulations nor the National Policy Statements provide a definition of what constitutes a 'significant' effect, and so PHE have derived a list of factors which it will take into consideration in the assessment of significance of effects, as outlined below. these list of factors should be read in conjunction with guidance from the above guides.

1. Sensitivity:

Is the population exposed to the NSIP at particular risk from effects on this determinant due to pre-existing vulnerabilities or inequalities (for example, are there high numbers in the local population of people who are young, older, with disabilities or long-term conditions, or on a low income)? Will the NSIP widen existing inequalities or introduce new inequalities in relation to this determinant?

2. Magnitude:

How likely is the impact on this determinant to occur? If likely, will the impact affect a large number of people / Will the impact affect a large geographic extent? Will the effects be frequent or continuous? Will the effects be temporary or permanent and irreversible?

3. Cumulative effects:

Will the NSIP's impacts on this determinant combine with effects from other existing or proposed NSIPs or large-scale developments in the area, resulting in an overall cumulative effect different to that of the project alone?

What are the cumulative effects of the impacts of the scheme on communities or populations. Individual impacts individually may not be significant but in combination may produce an overall significant effect.

4. Importance:

Is there evidence for the NSIP's effect on this determinant on health? Is the impact on this determinant important in the context of national, regional or local policy?

5. Acceptability:

What is the local community's level of acceptance of the NSIP in relation to this determinant? Do the local community have confidence that the applicants will promote positive health impacts and mitigate against negative health effects?

6. Opportunity for mitigation:

If this determinant is included in the scope for the EIA is there an opportunity to enhance any positive health impacts and/or mitigate any negative health impacts?

Scoping

The scoping report may determine that some of the wider determinants considered under human and population health can be scoped out of the EIA. If that, should be the case, detailed rationale and supporting evidence for any such exclusions must be provided. PHE will expect an assessment to have considered all of the determinants listed in Table1 of Appendix 2 as a minimum.

Vulnerable groups

Certain parts of the population may experience disproportionate negative health effects as a result of a development. Vulnerable populations can be identified through research literature, local population health data or from the identification of pre-existing health conditions that increase vulnerability.

The on health and wellbeing and health inequalities of the scheme will have particular effect on vulnerable or disadvantaged populations, including those that fall within the list of protected characteristics. Some protected groups are more likely to have elevated vulnerability associated with social and economic disadvantages. Consideration should be given to language or lifestyles that influence how certain populations are affected by impacts of the proposal, for example non-English speakers may face barriers to accessing information about the works or expressing their concerns.

Equality Impact Assessments (EqIA) are used to identify disproportionate effects on Protected Groups (defined by the Equality Act, 2010), including health effects. The assessments and findings of the Environmental Statement and the EqIA should be crossed reference between the two documents, particularly to ensure the assessment of potential impacts for health and inequalities and that resulting mitigation measures are mutually supportive.

The Wales Health Impact Assessment Support Unit (WHIASU), provides a suggested list of vulnerable groups

Age related groups

- Children and young people
- Older people

Income related groups

- People on low income
- Economically inactive

- Unemployed/workless
- People who are unable to work due to ill health

Groups who suffer discrimination or other social disadvantage

- People with physical or learning disabilities/difficulties
- Refugee groups
- People seeking asylum
- Travellers
- Single parent families
- Lesbian and gay and transgender people
- Black and minority ethnic groups
- Religious groups

Geographical groups

- People living in areas known to exhibit poor economic and/or health indicators
- People living in isolated/over-populated areas
- People unable to access services and facilities

Mental health

PHE supports the use of the broad definition of health proposed by the World Health Organisation (WHO). Mental well-being is fundamental to achieving a healthy, resilient and thriving population. It underpins healthy lifestyles, physical health, educational attainment, employment and productivity, relationships, community safety and cohesion and quality of life. NSIP schemes can be of such scale and nature that will impact on the over-arching protective factors, which are:

- Enhancing control
- Increasing resilience and community assets
- Facilitating participation and promoting inclusion.

There should be parity between mental and physical health, and any assessment of health impact should include the appreciation of both. A systematic approach to the assessment of the impacts on mental health, including suicide, is required. The **Mental Well-being Impact Assessment (MWIA)** could be used as a methodology. The assessment should identify vulnerable populations and provide clear mitigation strategies that are adequately linked to any local services or assets

Perceptions about the proposed scheme may increase the risk of anxiety or health effects by perceived effects. “Estimation of community anxiety and stress should be included as part of every risk or impact assessment of proposed plans that involve a potential environmental hazard.

Evidence base and baseline data

An assessment should be evidence based, using published literature to identify determinants and likely health effects. The strength of evidence identifying health effects can vary, but where the evidence for an association is weak it should not automatically be discounted.

There will be a range of publicly available health data including:

- National datasets such as those from the Office of National Statistics,
- Public Health England (PHE), including the fingertips data sets,
- Non-governmental organisations,
- Local public health reports, such as the Joint Strategic Needs Assessment, Health and Wellbeing Strategies;
- Consultation with local authorities, including local authority public health teams;
- Information received through public consultations

Mitigation

If the assessment has identified that significant negative effects are likely to occur with respect to the wider determinants of health, the assessment should include a description of planned mitigation measures the applicant will implement to avoid or prevent effects on the population.

Mitigation and/or monitoring proposals should be logical, feasible and have a clear governance and accountability framework indicating who will be responsible for implementation and how this will be secured during the construction and/or operation of the NSIP.

Positive benefits from the scheme

The scale of many NSIP developments will generate the potential for positive impacts on health and wellbeing; however, delivering such positive health outcomes often requires specific enabling or enhancement measures. For example, the construction of a new road network to access an NSIP site may provide an opportunity to improve the active transport infrastructure for the local community. PHE expects developments to consider and report on the opportunity and feasibility of positive impacts. These may stand alone or be considered as part of the mitigation measures.

Monitoring

PHE expects an assessment to include consideration of the need for monitoring. It may be appropriate to undertake monitoring where:

- Critical assumptions have been made
- There is uncertainty about whether negative impacts are likely to occur as it may be appropriate to include planned monitoring measures to track whether impacts do occur.
- There is uncertainty about the potential success of mitigation measures
- It is necessary to track the nature of the impact and provide useful and timely feedback that would allow action to be taken should negative impacts occur

How to contact PHE

If you wish to contact us regarding an existing or potential NSIP application please email: nsipconsultations@phe.gov.uk

Appendix 2

[Table 1 – Wider determinants of health and wellbeing](#)

Health and wellbeing themes			
Access	Traffic and Transport	Socioeconomic	Land Use
Wider determinants of health and wellbeing			
<p>Access to :</p> <ul style="list-style-type: none"> • local public and key services and facilities. • Good quality affordable housing. • Healthy affordable food. • The natural environment. • The natural environment within the urban environment. • Leisure, recreation and physical activities within the urban and natural environments. 	<ul style="list-style-type: none"> • Accessibility. • Access to/by public transport. • Opportunities for access by cycling and walking. • Links between communities. • Community severance. • Connections to jobs. • Connections to services, facilities and leisure opportunities. 	<ul style="list-style-type: none"> • Employment opportunities, including training opportunities. • Local business activity. • Regeneration. • Tourism and leisure industries. • Community/social cohesions and access to social networks. • Community engagement. 	<ul style="list-style-type: none"> • Land use in urban and/or /rural settings. • Quality of Urban and natural environments

1) Access

a. Access to local, public and key services and facilities

Access to local facilities can increase mobility and social participation. Body mass index is significantly associated with access to facilities, including factors such as the mix and density of facilities in the area. The distance to facilities has no or only a small effect on walking and other physical activities. Access to recreational facilities can increase physical activity, especially walking for recreation, reduce body weight, reduce the risk of high blood pressure, and reduce the number of vehicle trips, the distances travelled and greenhouse gas emissions.

Local services include health and social care, education, employment, and leisure and recreation. Local facilities include community centres, shops, banks/credit unions and Post Offices. Services and facilities can be operated by the public, private and/or voluntary sectors. Access to services and facilities is important to both physical and mental health and wellbeing. Access is affected by factors such as availability, proximity

to people's place of residence, existence of transport services or active travel infrastructure to the location of services and facilities, and the quality of services and facilities.

The construction or operation of an NSIP can affect access adversely: it may increase demand and therefore reduce availability for the existing community; during construction, physical accessibility may be reduced due to increased traffic and/or the blockage of or changes to certain travel routes. It is also possible that some local services and facilities are lost due to the land-take needed for the NSIP.

Conversely if new routes are built or new services or facilities provided the NSIP may increase access. NSIPs relating to utilities such as energy and water can maintain, secure or increase access to those utilities, and thereby support health and wellbeing.

b. Access to good-quality affordable housing

Housing refurbishment can lead to an improvement in general health and reduce health inequalities. Housing improvements may also benefit mental health. The provision of diverse forms and types of housing is associated with increased physical activity. The provision of affordable housing is strongly associated with improved safety perceptions in the neighbourhood, particularly among people from low-income groups. For vulnerable groups, the provision of affordable housing can lead to improvements in social, behavioural and health related outcomes. For some people with long term conditions, the provision of secure and affordable housing can increase engagement with healthcare services, which can lead to improved health-related outcomes. The provision of secure and affordable housing can also reduce engagement in risky health-related behaviours. For people who are homeless, the provision of affordable housing increases engagement with healthcare services, improves quality of life and increases employment, and contributes to improving mental health.

Access to housing meets a basic human need, although housing of itself is not necessarily sufficient to support health and wellbeing: it is also important that the housing is of good quality and affordable. Factors affecting the quality of housing include energy efficiency (eg effective heating, insulation), sanitation and hygiene (eg toilet and bathroom), indoor air quality including ventilation and the presence of damp and/or mould, resilience to climate change, and overcrowding. The affordability of housing is important because for many people, especially people on a low income, housing will be the largest monthly expense; if the cost of housing is high, people may not be able to meet other needs such as the need for heating in winter or food. Some proposals for NSIPs include the provision of housing, which could be beneficial for the health and wellbeing of the local population. It is also possible that some housing will be subject to a compulsory purchase order due to the land-take needed for an NSIP.

c. Access to affordable healthy food

Access to healthy food is related to the provision of public and active transport infrastructure and the location and proximity of outlets selling healthier food such as fruit and vegetables. For the general population, increased access to healthy, affordable food through a variety of outlets (shops, supermarkets, farmers' markets and community gardens) is associated with improved dietary behaviours, including attitudes towards healthy eating and food purchasing behaviour, and improved adult weight. Increased access to unhealthier food retail outlets is associated with increased weight in the general population and increased obesity and unhealthy eating behaviours among children living in low-income areas. Urban agriculture can improve attitudes towards healthier food and increase fruit and vegetable consumption.

Factors affecting access to healthy affordable food include whether it is readily available

from local shops, supermarkets, markets or delivery schemes and/or there are opportunities to grow food in local allotments or community gardens. People in environments where there is a high proportion of fast food outlets may not have easy access to healthy affordable food.

d. Access to the natural environment

Availability of and access to safe open green space is associated with increased physical activity across a variety of behaviours, social connectedness, childhood development, reduced risk of overweight and obesity and improved physical and mental health outcomes. While the quantity of green space in a neighbourhood helps to promote physical activity and is beneficial to physical health, eg lower rates of mortality from cardiovascular disease and respiratory disease in men, the availability of green environments is likely to contribute more to mental health than to physical health: the prevalence of some disease clusters, particularly anxiety and depression, is lower in living environments which have more green space within a 1-km radius.

The proximity, size, type, quality, distribution, density and context of green space are also important factors. Quality of green space may be a better predictor of health than quantity, and any type of green space in a neighbourhood does not necessarily act as a venue for, or will encourage, physical activity. 'Walkable' green environments are important for better health, and streetscape greenery is as strongly related to self-reported health as green areas. Residents in deprived areas are more likely to perceive access to green space as difficult, to report poorer safety, to visit the green space less frequently and to have lower levels of physical activity. The benefits to health and wellbeing of blue space include lower psychological distress.

The natural environment includes the landscape, waterscape and seascape. Factors affecting access include the proximity of the natural environment to people's place of residence, the existence of public transport services or active travel infrastructure to the natural environment, the quality of the natural environment and feelings of safety in the natural environment. The construction of an NSIP may be an opportunity to provide green and/or blue infrastructure in the local area. It is also possible that green or blue infrastructure will be lost due to the land-take needed for the NSIP.

e. Access to the natural environment within the urban environment

Public open spaces are key elements of the built environment. Ecosystem services through the provision of green infrastructure are as important as other types of urban infrastructure, supporting physical, psychological and social health, although the quality and accessibility of green space affects its use, C19, ethnicity and perceptions of safety. Safe parks may be particularly important for promoting physical activity among urban adolescents. Proximity to urban green space and an increased proportion of green space are associated with decreased treatment of anxiety/mood disorders, the benefits deriving from both participation in usable green space near to home and observable green space in the neighbourhood. Urban agriculture may increase opportunities for physical activity and social connections.

A view of 'greenery' or of the sea moderates the annoyance response to noise. Water is associated with positive perceptive experiences in urban environments, with benefits for health such as enhanced contemplation, emotional bonding, participation and physical activity. Increasing biodiversity in urban environments, however, may promote the introduction of vector or host organisms for infectious pathogens, eg green connectivity may potentiate the role of rats and ticks in the spread of disease, and bodies of water may provide habitats for mosquitoes. Owing to economic growth, population size and urban and industrial expansion in the EU, to maintain ecosystem services at 2010 levels, for every additional percentage increase in the proportion of

'artificial' land, there needs to be a 2.2% increase in green infrastructure.

The natural environment within the urban environment includes the provision of green space and blue space in towns and cities. Factors involved in access include the proximity of the green and/or blue space to people's place of residence, the existence of transport services or active travel infrastructure to the green and/or blue space, the quality of the green and/or blue space and feelings of safety when using the green and/or blue space. The construction of an NSIP may be an opportunity to provide green and/or blue infrastructure in the local urban environment. It is also possible that green or blue infrastructure in the urban environment will be lost due to the land-take needed for the NSIP.

- f. Access to leisure, recreation and physical activity opportunities within the urban and natural environments.

Access to recreational opportunities, facilities and services is associated with risk factors for long-term disease; it can increase physical activity, especially walking for recreation, reduce body mass index and overweight and obesity, reduce the risk of high blood pressure, and reduce the number of vehicle trips, the distances travelled and greenhouse gas emissions. It can also enhance social connectedness. Children tend to play on light-traffic streets, whereas outdoor activities are less common on high-traffic streets. A perception of air pollution can be a barrier to participating in outdoor physical activity. There is a positive association between urban agriculture and increased opportunities for physical activity and social connectivity. Gardening in an allotment setting can result in many positive physical and mental health-related outcomes. Exercising in the natural environment can have a positive effect on mental wellbeing when compared with exercising indoors.

Leisure and recreation opportunities include opportunities that are both formal, such as belonging to a sports club, and informal, such as walking in the local park or wood. Physical activity opportunities include routine activity as part of daily life, such as walking or cycling to work, and activity as part of leisure or recreation, such as playing football. The construction of an NSIP may enhance the opportunities available for leisure and recreation and physical activity through the provision of new or improved travel routes, community infrastructure and/or green or blue space. Conversely, construction may reduce access through the disruption of travel routes to leisure, recreation and physical activity opportunities.

2) **Traffic and Transport**

- a. Accessibility

Walkability, regional accessibility, pavements and bike facilities are positively associated with physical activity and negatively related to body weight and high blood pressure, and reduce the number of vehicle trips, the distances travelled and greenhouse gas emissions. Body mass index is associated with street network accessibility and slope variability.

Accessibility in relation to transport and travel has several aspects including whether potential users can gain physical access to the infrastructure and access to the services the infrastructure provides. The design and operation of transport infrastructure and the associated services should take account of the travel needs of all potential users including people with limited mobility. People whose specific needs should be considered include pregnant women, older people, children and young people and people with a disability. Other aspects of transport infrastructure affecting accessibility include safety and affordability, both of which will affect people's ability to

travel to places of employment and/or key local services and facilities and/or access their social networks.

b. Access to / by public transport

Provision of high-quality public transport is associated with higher levels of active travel among children and among people commuting to work, with a decrease in the use of private cars. Combining public transport with other forms of active travel can improve cardiovascular fitness. Innovative or new public transport interventions may need to be marketed and promoted differently to different groups of transport users, eg by emphasising novelty to car users while ensuring that the new system is seen by existing users as coherently integrated with existing services.

Transport facilitates access to other services, facilities and amenities important to health and wellbeing. Public transport is any transport open to members of the public including bus, rail and taxi services operated by the public, private or community sectors. For people who do not have access to private transport, access to public transport is important as the main agency of travel especially for journeys >1 mile. Access to public transport is not sufficient, however, and access by public transport needs to be taken into account: public transport services should link places where people live with the destinations they need or want to visit such as places of employment, education and healthcare, shops, banks and leisure facilities. Other aspects of access to public transport include affordability, safety, frequency and reliability of services.

c. Opportunities for / access by cycling & walking

Walking and cycling infrastructure can enhance street connectivity, helping to reduce perceptions of long-distance trips and providing alternative routes for active travel. Prioritising pedestrians and cyclists through changes in physical infrastructure can have positive behavioural and health outcomes, such as physical activity, mobility and cardiovascular outcomes. The provision and proximity of active transport infrastructure is also related to other long-term disease risk factors, such as access to healthy food, social connectedness and air quality. The perception of air pollution, however, appears to be a barrier to participating in active travel.

Perceived or objective danger may also have an adverse effect on cycling and walking, both of which activities decrease with increasing traffic volume and speed, and cycling for leisure decreases as local traffic density increases. Health gains from active travel policies outweigh the adverse effects of road traffic incidents. New infrastructure to promote cycling, walking and the use of public transport can increase the time spent cycling on the commute to work, and the overall time spent commuting among the least-active people. Active travel to work or school can be associated with body mass index and weight, and may reduce cardiovascular risk factors and improve cardiovascular outcomes. The distance of services from cycle paths can have an adverse effect on cycling behaviour, whereas mixed land use, higher densities and reduced distances to non-residential destinations promote transportation walking.

d. Links between communities

Social connectedness can be enhanced by the provision of public and active transport infrastructure and the location of employment, amenities, facilities and services.

e. Community severance

In neighbourhoods with high volumes of traffic, the likelihood of people knowing and trusting neighbours is reduced.

f. Connections to jobs

The location of employment opportunities and the provision of public and active transportation infrastructure are associated with risk factors for long-term disease such as physical activity. Good pedestrian and cycling infrastructure can promote commuting physical activity. Improved transport infrastructure has the potential to shift the population distribution of physical activity in relation to commuting, although a prerequisite may be a supportive social environment. Mixed land use, higher densities and reduced distances to non-residential destinations promote transportation walking.

The ease of access to employment, shops and services including the provision of public and active transport are important considerations and schemes should take any opportunity to improve infrastructure to promote cycling, walking and the use of public transport

g. Connections to services, facilities and leisure opportunities

Mixed land use, higher densities and reduced distances to non-residential destinations promote transportation walking. Access to recreational opportunities and the location of shops and services are associated with risk factors for long-term disease such as physical activity, access to healthy food and social connectedness. Increased distance of services from cycle paths can have an adverse effect on cycling behaviour.

3) **Socio Economic**

a. Employment opportunities including training opportunities

Employment is generally good for physical and mental health and well-being, and worklessness is associated with poorer physical and mental health and well-being. Work can be therapeutic and can reverse the adverse health effects of unemployment for healthy people of working age, many disabled people, most people with common health problems and social security beneficiaries. Account must be taken of the nature and quality of work and its social context and jobs should be safe and accommodating. Overall, the beneficial effects of work outweigh the risks of work and are greater than the harmful effects of long-term unemployment or prolonged sickness absence. Employment has a protective effect on depression and general mental health.

Transitions from unemployment to paid employment can reduce the risk of distress and improve mental health, whereas transitions into unemployment are psychologically distressing and detrimental to mental health. The mental health benefits of becoming employed are also dependent on the psychosocial quality of the job, including level of control, demands, complexity, job insecurity and level of pay: transition from unemployment to a high-quality job is good for mental health, whereas transition from unemployment to a low-quality job is worse for mental health than being unemployed. For people receiving social benefits, entry into paid employment can improve quality of life and self-rated health (physical, mental, social) within a short time-frame. For people receiving disability benefits, transition into employment can improve mental and physical health. For people with mental health needs, entry into employment reduces the use of mental health services.

For vocational rehabilitation of people with severe mental illness (SMI), Supported Employment is more effective than Pre-vocational Training in helping clients obtain competitive employment; moreover, clients in Supported Employment earn more and

work more hours per month than those in Pre-vocational Training.

b. Local Business Activity

It is important to demonstrate how a proposed development will contribute to ensuring the vitality of town centres. Schemes should consider the impact on local employment, promote beneficial competition within and between town centres, and create attractive, diverse places where people want to live, visit and work

In rural areas the applicant should assess the impact of the proposals on a prosperous rural economy, demonstrate how they will support the sustainable growth and expansion of all types of business and enterprise in rural areas, promoting the development and diversification of agricultural and other land based rural businesses.

c. Regeneration

Following rebuilding and housing improvements in deprived neighbourhoods, better housing conditions are associated with better health behaviours; allowing people to remain in their neighbourhood during demolition and rebuilding is more likely to stimulate life-changing improvements in health behaviour than in people who are relocated. The partial demolition of neighbourhoods does not appear to affect residents' physical or mental health. Mega-events, such as the Olympic Games, often promoted on the basis of their potential legacy for regeneration, appear to have only a short-term impact on mental health.

d. Tourism and Leisure Industries

The applicant should assess the impact of the proposed development on retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. In rural locations assessment and evaluation of potential impacts on sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors should be undertaken.

e. Community / social cohesion and access to social networks

The location of employment, shops and services, provision of public and active transport infrastructure and access to open space and recreational opportunities are associated with social connectedness. Access to local amenities can increase social participation. Neighbourhoods that are more walkable can increase social capital. Urban agriculture can increase opportunities for social connectivity. Infrastructure developments, however, can affect the quality of life of communities living in the vicinity, mediated by substantial community change, including feelings of threat and anxiety, which can lead to psychosocial stress and intra-community conflict.

f. Community engagement

Public participation can improve environmental impact assessments, thereby increasing the total welfare of different interest groups in the community. Infrastructure development may be more acceptable to communities if it involves substantial public participation.

4) **Land Use**

a. Land use in urban and / or rural settings

Land-use mix including infrastructure:

Land use affects health not only by shaping the built environment, but also through the balance of various types of infrastructure including transport. Vulnerable groups in the population are disproportionately affected by decisions about land use, transport and the built environment. Land use and transport policies can result in negative health impacts due to low physical activity levels, sedentary behaviours, road traffic incidents, social isolation, air pollution, noise and heat. Mixed land use can increase both active travel and physical activity. Transportation walking is related to land-use mix, density and distance to non-residential destinations; recreational walking is related to density and mixed use. Using modelling, if land-use density and diversity are increased, there is a shift from motorised transport to cycling, walking and the use of public transport with consequent health gain from a reduction in long-term conditions including diabetes, cardiovascular disease and respiratory disease.

Proximity to infrastructure:

Energy resource activities relating to oil, gas and coal production and nuclear power can have a range of negative effects on children and young people. Residing in proximity to motorway infrastructure can reduce physical activity. For residents in proximity to rail infrastructure, annoyance is mediated by concern about damage to their property and future levels of vibration. Rural communities have concerns about competing with unconventional gas mining for land and water for both the local population and their livestock."

b. Quality of urban and natural environments

Long-term conditions such as cardiovascular disease, diabetes, obesity, asthma and depression can be moderated by the built environment. People in neighbourhoods characterised by high 'walkability' walk more than people in neighbourhoods with low 'walkability' irrespective of the land-use mix. In neighbourhoods associated with high 'walkability' there is an increase in physical activity and social capital, a reduction in overweight and blood pressure, and fewer reports of depression and of alcohol abuse. The presence of walkable land uses, rather than their equal mixture, relates to a healthy weight. Transportation walking is at its highest levels in neighbourhoods where the land-use mix includes residential, retail, office, health, welfare and community, and entertainment, culture and recreation land uses; recreational walking is at its highest levels when the land-use mix includes public open space, sporting infrastructure and primary and rural land uses. Reduced levels of pollution and street connectivity increase participation in physical activity.

Good-quality street lighting and traffic calming can increase pedestrian activity, while traffic calming reduces the risk of pedestrian injury. 20-mph zones and limits are effective at reducing the incidence of road traffic incidents and injuries, while good-quality street lighting may prevent them. Public open spaces within neighbourhoods encourage physical activity, although the physical activity is dependent on different aspects of open space, such as proximity, size and quality. Improving the quality of urban green spaces and parks can increase visitation and physical activity levels.

Living in a neighbourhood overlooking public areas can improve mental health, and residential greenness can reduce the risk of cardiovascular mortality. Crime and safety issues in a neighbourhood affect both health status and mental health. Despite the complexity of the relationship, the presence of green space has a positive effect on crime, and general environmental improvements may reduce the fear of crime. Trees can have a cooling effect on the environment – an urban park is cooler than a non-green site. Linking road infrastructure planning and green infrastructure planning can produce improved outcomes for both, including meeting local communities' landscape sustainability objectives.

Appendix 3: PHE Scoping Response for Noise and Public Health

Health Outcomes and Significance of Impacts

PHE expects the Applicant to consider the potential effects on human health attributable to noise generated by construction and operational phases of the Scheme. The scientific evidence base on the health effects of noise has developed rapidly during the last few years [1,2]. PHE expects the Applicant to consider the best available evidence, in addition to national guidance [3,4]. Subject to availability and stakeholder consultation, exposure-response relationships derived in a local context can be used for the main assessment of noise annoyance. However PHE encourages the Applicant to also use exposure response relationships from recent systematic reviews of the evidence (e.g. [2]) to inform sensitivity analyses. For the other health outcomes, the recent WHO ENG and associated systematic reviews offer a good foundation for appraisal of noise impacts [1, 2]. The quantification of health outcomes can be expressed in terms of the number of people affected, Disability Adjusted Life Years (DALYs) and/or monetary terms.

PHE expects judgements of significance of noise impacts to be framed around impacts on health and quality of life, rather than noise exposure *per se*. Judgements of significance should reflect both the severity of the health outcome and the probability of occurrence (size and sensitivity of population exposed). Factors that can be taken into consideration include:

- health impacts from aviation and other sources of noise (due to existing and future exposure);
- existing health impacts from other environmental risk factors, including air pollution (due to existing and future exposure);
- noise important areas (areas with very high noise exposure);
- areas valued for their tranquillity (areas with relatively low levels of anthropogenic noise);
- number and distribution of overflights throughout the day/evening/night periods, and opportunities for respite (predictable periods without aircraft noise);
- vulnerable groups in the local population, and risk of widening inequalities.

The adopted methodology for defining significance needs to be clearly set out at the earliest opportunity. PHE recommends that the methodology is discussed and agreed with relevant stakeholders, including the airport, airlines, local authorities and local communities, through a consultative process. PHE recommends that any disagreement amongst stakeholders on the methodology of defining significance is acknowledged in the PEIR and could be used to inform additional sensitivity analyses.

The Airports National Policy Statement (ANPS) states that:

“Development consent should not be granted unless the Secretary of State is satisfied that the proposals will meet the following aims for the effective management and control of noise, within the context of government policy on sustainable development:

- *Avoid significant adverse impacts on health and quality of life from noise;*
- *Mitigate and minimise adverse impacts on health and quality of life from noise; and*
- *Where possible, contribute to improvements to health and quality of life.*

PHE notes the Applicant’s statement *“the ‘avoid’ requirement for significant effects is much stronger than the requirement to minimise adverse effects”* (Scoping Report Volume 1, Main Text 7.8.49). PHE would welcome clarity on this – PHE expects the Applicant to give equal weight to all three aims of the ANPS and the Noise Policy Statement for England (NPSE).

Noise assessment

PHE recommends that the sound environment with and without the scheme is characterised using a “noise scorecard” approach, using a variety of metrics such as averaged, maximum and statistical noise levels, and number of noise event metrics, split into appropriate time and seasonal periods. [5-7]

Para. 7.8.24 states that “the study area for noise and vibration effects includes all receptors that may experience potentially significant adverse impacts”. It is not clear how this approach will enable the second aim of the ANPS/NPSE to be fulfilled.

Para. 7.8.41 suggests that “absolute noise level benchmarks” have been informed by BS8233:2014. This British Standard followed recommendations in the WHO Guidelines for Community Noise (1999). PHE recommends that the Applicant uses the much more recent evidence in the WHO ENG 2018 [1], which supersedes the CNG for external noise levels from transportation sources. For sleep disturbance effects, PHE recommends that the Applicant refers to the relevant WHO systematic review [2] in addition to ProPG.

Change-Effect

There is a growing evidence base on a ‘change effect’ or “excess reaction” with respect to annoyance reactions to aviation noise [8-12]. In order to accurately predict impacts on health and quality of life, PHE suggests that the Applicant carefully considers the evidence on a change effect and incorporates it into their methodology where appropriate. For example exposed populations could be divided into categories related to the nature of the change they may experience:

- Number of people experiencing noticeable aviation noise/overflights for the first time;
- Number of people experiencing a noticeable increase in aviation noise/number of flight movements;
- Number of people experiencing no noticeable change in aviation noise/number of flight movements;
- Number of people experiencing a noticeable decrease in aviation noise/number of flight movements;

PHE expects what is a *noticeable* increase/decrease to be informed by the evidence and agreed with relevant stakeholders.

Cumulative and Inter-Related Effects

PHE welcomes the Applicant’s intention to assess cumulative and inter-related effects as part of the EIA (6.2.45), and notes that due to the lack of a single standardised methodology, the Scheme Promoter has chosen to use the guidance provided by the Planning Inspectorate (Advice Note Seventeen) (7.15.11). PHE recommends that, where possible, a quantitative methodology is applied, considering for example, the temporal and spatial distributions of impacts, whether impacts are additive, or if a ‘worst-case’ approach should be adopted.

Mitigation Measures

The ANPS has multiple references to mitigation measures associated with potential noise impacts, including technological and operational improvements, individual and community-level compensation, respite, a noise envelope, screening and noise insulation. The ANPS also states that:

“The Secretary of State will expect the applicant to demonstrate how these provisions are secured, and how they will be operated.”

PHE expects decisions about mitigation measures to be underpinned by good quality evidence, particularly whether mitigation measures are achievable, whether they may have adverse consequences relating to other environmental factors such as air quality and carbon emissions, and

whether they are proven to reduce adverse impacts on health and quality of life. Where evidence is weak or lacking, PHE expects the Applicant to demonstrate how the effectiveness of interventions will be monitored during construction and operational phases of the scheme, to ensure that the desired effects are being achieved.

Para. 7.11.39 states that

“Where appropriate, the approach to monitoring will focus on environmental precursors to health, as this removes many of the confounding factors associated with multicausal health endpoints, genetic predisposition and lifestyle choices; provides a means to intervene before a manifest health outcome; and can be a more effective measure of change directly attributable to the Project (eg monitoring air quality and not respiratory disease prevalence).”

Whilst PHE acknowledges the complexities of attributing specific health endpoints to changes arising from the Scheme, due to many confounding factors, PHE does not agree that solely monitoring “environmental precursors” will provide a satisfactory solution. For example, whilst properly designed, installed, maintained and operated noise insulation measures may be effective at reducing internal noise levels, there is currently insufficient good quality evidence which demonstrates that noise insulation is effective at reducing adverse psychological and physiological health outcomes [8]. PHE would therefore recommend proposals by the Applicant to monitor and assess whether noise interventions (including sound insulation) have the desired health outcome, and any potential for widening inequalities (for example affordability concerns for partially-funded schemes). Furthermore, PHE expects any proposed insulation schemes to take a holistic approach that aims to achieve a healthy indoor environment, including considerations of noise, ventilation, overheating risk and indoor air quality. Such schemes should also consider occupants’ values, preferences and behaviours, for example preferences to keep windows open at night [13-15].

Construction

PHE notes that the Applicant will produce a Code of Construction Practice (CoCP) on appointment of a principal contractor (5.3.10). PHE expects the CoCP to include a detailed programme of construction activities which highlights the times and durations of particularly noisy works, the proposed mitigation measures, and a strategy for actively communicating this information to local communities and responding effectively to any concerns raised.

PHE welcomes the Applicant’s intention to identify potential health consequences from changes in transport composition and flow rates due to construction HGVs and workers as part of the road traffic and transport effects (7.11.21).

There is a paucity of scientific evidence on the health effects attributable to construction noise for large infrastructure projects, where construction may last for several years. PHE recommends that the Applicant gives careful consideration on whether health monitoring is required for any communities affected by construction activities for long durations.

Green Spaces, Private Amenity Spaces and Tranquillity

PHE notes the Applicant’s statement that, “consideration of Quiet Areas is proposed to be scoped out of this assessment” because “no ‘Quiet Areas’ designated within Local Plans... have been identified that could be affected by the Project” (7.8.56). PHE does not support this approach – the fact that no Quiet Areas have been designated in the vicinity does not necessarily mean that there are no areas prized by local communities for their tranquillity, particularly given the rural setting of the Scheme. The scientific evidence suggests that tranquil areas can have a direct and beneficial health effect and can also help restore or compensate for adverse health effects attributed to noise within the residential environment. For example studies have found that people living in noisy areas appear to have a greater need for areas offering quiet than people not exposed to noise at home [16-18]. PHE therefore recommends that the Applicant assesses the potential impacts of the

Scheme on the quality of quiet/tranquil areas (and green space more generally). The Applicant should also consider whether there are opportunities to create and designate new quiet/tranquil areas, thereby responding to the third aim of the ANPS and NPSE.

Noise insulation schemes do not protect external amenity space (such as balconies, private gardens or shared community green spaces) from increased noise exposure. The Applicant proposes that strategic green infrastructure could be provided as part of the scheme, to extend and link existing green spaces (7.2.31). PHE recommends that any new green infrastructure should be developed with soundscape and tranquillity in mind in order to maximise its restorative benefits.

PHE notes the Applicant's proposal to consider tranquillity within the 'Landscape, Townscape and Visual Resources' chapter (Table 7.15.2). PHE recommends that any assessment of tranquillity is holistic in nature, taking account of cross-modal perception and including both aural and visual elements [19]. PHE further suggests that the Applicant considers 'Recreation' in the context of both green space and tranquillity assessments - access to, and quality of, green space has a bearing on people's decisions and behaviour in relation to recreation [20-23]. The topic of recreation could therefore potentially be better addressed outside of the 'Agricultural Land Use and Recreation' chapter.

Baseline Noise Conditions & Noise Modelling

PHE notes the Applicant's proposal to use noise modelling data from the 92-day summer period for 2018 (7.8.10) for the air noise assessment and 2016 noise measurement data for the ground noise assessment (7.8.15). PHE welcomes the Applicant's separate reporting of baseline ground noise levels for daytime, evening and night (7.8.38).

PHE expects the noise modelling to be carried out using calculation methods and software that have been independently validated, and all relevant input assumptions and data (including aircraft fleet mix) made publicly accessible. The noise calculations will be some of the more technically complex aspects of the project, therefore it is essential that relevant stakeholders have confidence in the generated outputs.

Stakeholder Engagement and local research

PHE welcomes the Applicant's use of exhibition style consultation, as used in the pre-scoping consultation ending January 2019. PHE encourages the Applicant to continue to use innovative and effective strategies to communicate potential changes in the acoustic environment at community level. PHE recommends that the Applicant considers whether immersive audio-visual simulations at future consultation events may help local communities better understand the potential impacts that the Scheme may have on their neighbourhood and their health and quality of life.

PHE expects the Applicant to explain at future stages of the DCO process how stakeholder responses in relation to noise have influenced and shaped the proposed Scheme. Furthermore, the Applicant should propose a suitable strategy for disseminating the findings of the PIER (and final ES) on the effects of noise on health to relevant stakeholders, including local communities and health practitioners.

PHE welcomes the Applicant's commissioning of research to better understand the perception of noise and its effects on local communities (7.8.20, 7.8.11), and recommends that findings are published in the peer-reviewed literature to further advance the evidence base.

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EIA Scoping Opinion Response of Reigate and Banstead Borough Council

27th September 2019

Application by Gatwick Airport Limited (GAL) (the Applicant) for an Order granting Development Consent for the Gatwick Airport Northern Runway (the Proposed Development)

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

1. Introduction

- 1.1. This response follows a scoping opinion request from Gatwick Airport Limited (GAL) to the Planning Inspectorate on 2nd September under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 for the routine use of the northern runway.
- 1.2. The northern runway was consented in 1979 for emergency use. Its use has historically been constrained by a planning condition and a s.106 agreement with Crawley Borough Council and West Sussex County Council which prevented its simultaneous use with the main runway. This agreement expired in August 2019.
- 1.3. Following the publication of the Government's policy statement *Beyond the Horizon: The Future of UK Aviation Making Best Use of Existing Runways* in June 2018, GAL propose "making best use" of the emergency runway to allow routine use of the northern runway for Code C aircraft arrivals simultaneously with arrivals and departures on the main runway. The Project proposes alterations to the northern runway; the reconfiguration of the taxiways; pier and stand alterations; a proposed new pier; reconfiguration of other airfield facilities; extensions to the north and south terminals; provision of additional hotel and office accommodation; surface access improvements; provision of additional carparking and reconfiguration of existing carparking; reconfiguration of existing utilities; landscape/ecological planting; and environmental mitigation. This will enable passenger numbers to increase to 74mppa and cargo throughput to increase to 227,100 tonnes by 2038.

- 1.4. GAL undertook initial public consultation on the proposed routine use of the northern runway as part of its draft masterplan consultation in October 2018 to January 2019. In the Council's response to the draft masterplan consultation we in principle supported "making best use" of the northern runway (noting that government policy recognises that the aviation sector is a major contributor to the economy; that the aviation makes an important contribution to UK GDP and employment; and the *Beyond the Horizon: The Future of UK Aviation Making Best Use of Existing Runways* policy statement) but considered that there was not enough detail within the draft masterplan (on the potential economic impact, jobs and skills impact, housing impact, environmental impact and surface access impact) to provide detailed comments or take a view on the proposed routine use of the northern runway.
- 1.5. GAL have indicated that they intend to submit an application for development consent to the Planning Inspectorate to make best use of the northern runway and that this will be accompanied by an Environmental Statement prepared in accordance with the Infrastructure Planning (Environmental Impact Assessment) (EIA) Regulations 2017, as amended. GAL has therefore submitted a Scoping Report to the Planning Inspectorate under Regulation 10 of the Infrastructure Planning (EIA) Regulations 2017. This will provide them with clarity as to what the Planning Inspectorate considers the main effects of the development are likely to be, and accordingly, the main topics on which the Environmental Statement (ES) should focus.
- 1.6. In accordance with Regulation 15(6) of the Town & Country Planning (EIA) Regulations 2017, before adopting a scoping opinion, the Planning Inspectorate must take into account "any information provided by the applicant about the proposed development; the specific characteristics of the particular development; the specific characteristics of development of the type concerned; and the environmental features likely to be significantly affected by the development". In addition, in accordance with Regulation 15(4), the Planning Inspectorate must not adopt a scoping opinion until they have consulted the consultation bodies. In accordance with Regulations 42(1)(b) and 43(1) of the Planning Act 2008, Reigate & Banstead Borough Council is a consultation body as whilst the majority of the airport boundary falls within the administrative area of Crawley Borough Council and West Sussex County Council, part of the existing/ proposed airport boundary also falls within the borough/district administrative areas of Reigate & Banstead, Tandridge and Mole Valley and the county of Surrey. The Council is therefore also a host authority in the DCO.

- 1.7. In accordance with Regulation 10(9) of the Town & Country Planning (EIA) Regulations 2017, the Council must either inform the Planning Inspectorate of the information that we consider should be provided within the ES or confirm that we do not have any comments on the ES scoping opinion.
- 1.8. Given that part of the existing and proposed Project site area falls within the borough and the borough is within the zone of influence of the airport, we are concerned to ensure that the potential impacts of the use of the northern runway are properly understood and mitigated. The following sections therefore outline our specific comments on the “Our Northern Runway: Making Best Use of Gatwick” EIA Scoping Report.
- 1.9. We are however particularly concerned that the proposed Project site boundary includes part of the Horley Strategic Business Park. This is an allocation within the Council’s Development Management Plan (DMP) to provide approximately 200,000sqm of predominantly B1a accommodation with limited B1b, B1c, B8 and non-B classes including primarily meet the borough’s strategic office need and Crawley Borough Council’s unmet office need with complementary uses including on-site catering, limited retail provision, hotel and conference facilities, gym, crèche and medical facilities. Evidence undertaken for the Council suggests that it will accommodate approximately 200,000sqm of accommodation and deliver 4,473 annual construction jobs (20 year construction programme) and 11,985 FTE operational jobs¹. Should the development be impacted by the proposed Project, there is a potential risk that, given the lack of alternative suitable and available sites, businesses looking to locate/ re-locate in the Gatwick Diamond sub-region will locate/ re-locate elsewhere and that there will be a consequent loss of investment and job creation within this important sub-region.
- 1.10. It should also be noted that since the submission of the EIA Scoping Report that the planning policy context for the borough has changed. On the 26^h September, Full Council approved the adoption of the DMP. The DMP therefore forms part of the Local Plan for the borough superseding the ‘saved’ Borough Local Plan policies. This should be reflected in the assessments and in the ES.

¹ Indicative quantities. See Reigate & Banstead Borough Council HOR9 Strategic Employment Site: Economic Assessment Task 2: Economic and Market Impact Analysis

http://www.reigate-banstead.gov.uk/downloads/file/3945/reigate_and_banstead_sesa_-_task_2_report_fc200917

2. Historic environment

Planning policy context

- 2.1. Following the adoption of the DMP on 26th September, references to the “emerging Reigate & Banstead Borough Development Management Plan 2018-2027” should be amended to “Reigate and Banstead Development Management Plan (Reigate and Banstead Borough Council, 2019)” to ensure consistency with other adopted Local Plan documents.
- 2.2. References to the following saved Borough Local Plan Policies should also be removed from Paragraph 7.1.1 of the EIA Scoping Report:
- Pc8 “Ancient Monuments & Archaeology”
 - Pc9 “Buildings of Historic Interest”
 - Pc10 “Buildings of Local Interest”
 - Pc11 “Historic Gardens”
 - Pc12-14 “Conservation Areas”

Issues proposed to be scoped out of the assessment

- 2.3. The Council notes that the EIA Scoping Report proposes scoping out:
- The potential effects on the importance of designated heritage assets located within the more urbanised areas of Horley and Crawley; and
 - Any effects on buried archaeological remains during the operational phase of the Project.
- 2.4. We have some concern regarding the scoping out of the potential effects on the importance of designated heritage assets located within the more urbanised areas of Horley and Crawley. We consider that such a generic blanket approach is not appropriate - whilst we recognise (and appreciate) the justification provided by GAL, namely that because their settings are predominantly urban that it is unlikely that any development at the airport would impact upon them², we note that this may lead to the screening out of the impact of the project on St Bartholomew’s Church which is Grade I listed and whilst in the urban area of Horley is within very close proximity to

² Paragraph 7.1.39 EIA Scoping Report

the proposed Project site boundary and proposed improvement works that may be required to the Longbridge roundabout³.

- 2.5. Given the close proximity of St Bartholomew's Church to the proposed Project site boundary and the proposed road improvements at the Longbridge roundabout, we would expect the assessment to specifically take into consideration the potential impact on St Bartholomew's Church. We would also request that the methodology allows for other urban heritage assets to be scoped in on a case-by-case basis.

Study area

- 2.6. The Council would expect to see greater clarity as to the proposed definition of the study area for the identification of non-designated heritage assets (locally listed buildings). We note that Paragraph 7.1.20 of the EIA Scoping Report says that the historic environment desk-based assessment will include locally listed buildings but that no study area is proposed for the identification of locally listed buildings within Paragraphs 7.1.26-7.1.28 of the EIA Scoping Report which detail the proposed study areas for heritage assessments⁴.

3. Landscape, Townscape and Visual Resources

Planning policy context

- 3.1. Following the adoption of the DMP on 26th September, references to the "emerging Reigate & Banstead Borough Development Management Plan 2018-2027" should be amended to "Reigate and Banstead Development Management Plan (Reigate and Banstead Borough Council, 2019)" to ensure consistency with other adopted Local Plan documents.
- 3.2. References to saved Borough Local Plan Policies Pc4 "Tree Protection", Pc6 "Urban Open Land" and Hr37 "Gatwick Area Open Setting" should also be removed from Paragraph 7.3.1 of the EIA Scoping Report following the adoption of the DMP.

³ See Paragraph 5.2.50 EIA Scoping Report

⁴ Paragraph 7.1.26 details the proposed study area for the archaeological element of the historic environment assessment; paragraph 7.1.27 details the proposed study area for the identification of designated heritage assets; and paragraph 7.1.28 outlines the methodology for defining the study area of potential airborne noise impacts on tranquility of heritage assets.

- 3.3. Reference should also be made to/ consideration should also be given to DMP Policy NHE7 “Rural Surrounds of Horley”.

Issues proposed to be scoped out of the assessment

- 3.4. The Council notes that GAL is proposing to scope out:
- All landscapes and townscapes located outside of the ZTV and all visual receptors within those locations.
 - All landscapes, townscapes and visual receptors located outside of a 5km radius of the Project site boundary except for the assessment of tranquillity. For the assessment of tranquillity all receptors within the noise preferential route (NPRs) and arrival flight paths will be assessed but receptors outside of the NPRs and arrival flight paths will be scoped out.
 - Seaside character effects.
- 3.5. We are concerned that GAL is proposing to scope out “all landscapes and townscapes located outside of the ZTV and all visual receptors within those locations except for the assessment of tranquillity”. The scope of the study area is highly dependent upon, and sensitive to, the robustness of the preliminary ZTV. Within the EIA Scoping Report there is limited clarity/ certainty over the location of future physical works (Paragraph 5.2.18 for example notes that the biomass boiler flue height is likely to be up to approximately 50 metres above ground level but does not provide any specificity regarding the location of the proposed biomass boiler) and insufficient explanation of methodology and assumptions which have been used to define/assess the preliminary ZTV. . Given these uncertainties and sensitivities, we consider that it is essential at this stage for GAL to provide greater clarity as to the parameters, assumptions and locations of physical works which have underpinned the ZTV and that allowance is made for a “margin for error”/ buffer to the preliminary ZTV.
- 3.6. With regards to the assessment of the zone of tranquillity, whilst we welcome a larger study area for the assessment, we have concerns with regards to the proposed scoping out of receptors outside of the existing NPRs and arrival flight paths given that the airport is currently in the process of two airspace modernisation programmes (Route 4 and FASI-s) and that at the time of the proposed operation of the Project these airspace changes are due to be in place. We therefore consider that receptors

outside of the existing NPRs should not be screened out of the scope of the assessment.

Scope of the assessment

- 3.7. Whilst the Council recognises that there are no designated landscapes within the proposed Project site boundary, we note that there are a number of landscapes⁵ within close proximity to the airport which are currently affected by overflight. We therefore welcome consideration of potential increased airborne noise and visual impacts within these areas that may occur as a result of increased flight numbers and changes in the volume of flights along defined flight paths as this could impact upon the landscape character and visual receptors as a result of a reduction in the perception of tranquillity within these areas but we also repeat our comments from the previous section regarding the potential change to existing flight paths as a result of the Route 4 and FASI-s airspace modernisation programmes. We therefore consider that receptors outside of the existing NPRs should not be screened out of the scope of the assessment.

Proposed methodology

- 3.8. The Council notes that GAL is proposing to use a number of representative viewpoints to assess the potential visual impacts of the Project on a range of different viewpoints towards the airport and welcome this approach. We note that a number of initial viewpoints have been identified (as detailed on Figure 7.2.1) but consider that – in ensuring a comprehensive suite of viewpoints – GAL also need to take into consideration Reigate & Banstead’s townscape character areas as defined in our 2004 Landscape and Townscape Character Assessment⁶. We would expect viewpoints to be agreed with the relevant authorities.
- 3.9. Whilst we welcome consideration of the potential effects of the construction of updated highways junctions on the Riverside Garden Park in Horley⁷, we consider that the scope of the assessment of potential effects should consider more generally countryside to the south of Horley east of the Balcombe Road which could be particularly affected by the construction of updated highway junctions. This area is

⁵ Such as the High Weald AONB, Surrey Hills AONB, Kent Downs AONB and South Downs National Park

⁶ Whilst we recognise the age of this document we still consider that it provides a useful and comprehensive assessment of landscape and townscape character areas within our borough.

⁷ As stated in Table 7.2.1 EIA Scoping Report

designated in the Council's DMP as part of the Rural Surrounds of Horley. DMP Policy NHE7 "Rural Surrounds of Horley" recognises that "intrinsic character and beauty of the countryside" within this area and seeks to protect the countryside and "enhance or maintain the visual and physical distinction between Horley urban area and its rural surroundings".

4. Ecology and Nature Conservation

Policy and legislative context

- 4.1. Following the adoption of the DMP on 26th September, references to the "emerging Reigate & Banstead Borough Development Management Plan 2018-2027" should be amended to "Reigate and Banstead Development Management Plan (Reigate and Banstead Borough Council, 2019)" to ensure consistency with other adopted Local Plan documents.
- 4.2. References to saved Borough Local Plan Policy Pc2G "Local Nature Conservation Interest" should be removed from Paragraph 7.3.1 of the EIA Scoping Report following the adoption of the DMP.

Issues proposed to be scoped out of the assessment

- 4.3. We note that GAL is proposing to scope out of the assessment of ecology and nature conservation, the direct habitat loss effects within the boundary of designated sites and the effects of dust on, or changes in water quality at, European designated sites.
- 4.4. We question whether there is enough evidence/ justification at this stage to screen out changes in water quality at European designated sites. Whilst we note the justification for screening out the effect on water quality at European designated sites (namely that European designated sites are hydrologically linked to the Project site and that therefore there is no impact pathway⁸), we would draw attention to Reigate & Banstead's Habitat Regulation Assessment produced for the DMP Examination (October/ November 2019) which concluded that there was a potential hydrological impact pathway between our borough and the Ashdown Forest SAC and SPA and ask that GAL consider whether this site should therefore be scoped in.

5. Geology and Ground Conditions

⁸ Paragraph 7.3.46 EIA Scoping Report

Policy and legislative context

- 5.1. Following the adoption of the DMP on 26th September, references to the “emerging Reigate & Banstead Borough Development Management Plan 2018-2027” should be amended to “Reigate and Banstead Development Management Plan (Reigate and Banstead Borough Council, 2019)” to ensure consistency with other adopted Local Plan documents.
- 5.2. References to saved Borough Local Plan Policy Pc2f “Regionally Important Geological Sites” should be removed from Paragraph 7.4.1 of the EIA Scoping Report following the adoption of the DMP.

Issues proposed to be scoped out of the assessment

- 5.3. The Council notes that GAL is proposing to scope out from the assessment of geology and ground conditions the effects on geological SSSI and LGSs and effects on groundwater resources. From a borough perspective, we agree with the justification provided to scope out these issues.
- 5.4. We would however welcome additional clarity as to whether consideration of potential for increased run-off during the operational phase is proposed to be assessed as part of potential contamination impacts. We consider that it should be assessed as part of the scope of the assessment.

6. Water environment

Policy and legislative context

- 6.1. Following the adoption of the DMP on 26th September, references to the “emerging Reigate & Banstead Borough Development Management Plan 2018-2027” should be amended to “Reigate and Banstead Development Management Plan (Reigate and Banstead Borough Council, 2019)” to ensure consistency with other adopted Local Plan documents.
- 6.2. References to saved Borough Local Plan policies Ut4 “Flooding” and Ut3 “Foul and Surface Water” should be removed from Paragraph 7.5.1 of the EIA Scoping Report following the adoption of the DMP.

Context

- 6.3. The Council notes that the airport is located within the Upper Mole catchment and that the River Mole flows through the airport, passing under the main and northern runway in a culvert and that tributaries of the River Mole, including Crawter's Brook, the Gatwick Stream, Man's Brook and Westfield Stream all run through/ close to the Project site.
- 6.4. In Figure 7.5.1 which outlines the general water features, the Council notes that the Burstow Stream and Burstow Stream Tributary are incorrectly labelled as 'non-main river' when they are actually identified by the Environment Agency as main rivers. This must be amended and the correct classification of these features reflected in any assessments undertaken so far/ any emerging assessments.

Issues proposed to be scoped out of the assessment

- 6.5. The Council notes that GAL is proposing to scope out tidal/ coastal flooding and impacts on public water supplies from groundwater (with the potential exception of extraction from the Upper Tunbridge Wells Sand). From a Reigate & Banstead perspective we are satisfied with the justification for scoping out these issues.

Proposed study area

- 6.6. With regards to the proposed study area, the Council notes that Paragraph 7.5.72 states that "the study area will generally be defined by a 2km radius beyond the Project site boundary". The Council considers that it is unclear what the justification is for the delineation of this study area and that more information should be provided in order for us to take a view on whether it is appropriate. The Council notes that Paragraph 7.5.72 states that "this study area could be extended where a hydrological pathway is identified as part of the assessment phase when further data has been collected, the Project design evolves, site surveys have been undertaken or in response to consultation with stakeholders" but we consider that the wording is weak and that at the very least that there should be more certainty for the potential expansion of the study area (for example, "the study area will be extended where ..." rather than "could be extended").

Proposed methodology

- 6.7. The Council notes that at Paragraph 7.5.4 it is stated that “GAL has recently completed the development of a fluvial hydraulic model of the Upper River Mole catchment”. It is unclear from the information provided in the EIA as to whether this model has been prepared in consultation with the Environment Agency and whether it has the agreement of the Environment Agency with regards to its robustness/ methodology. The Council would expect this if it is to be used to assess the potential impact of the Project on the surrounding water environment and would therefore welcome confirmation from GAL that the EA is satisfied with the model and methodology.
- 6.8. Also with regards to the proposed methodology of the study, Paragraph 7.5.6 states that “an assessment of the existing flood risk to the Project site has been commenced using publicly available information”. The Council notes that Table 7.5.1 provides a summary of the data collected to date to inform this assessment but that this excludes the Reigate & Banstead Strategic Flood Risk Assessment (SFRA)⁹ produced for the DMP Examination in October/November 2018. We expect this evidence document to be acknowledged and given due regard in the EIA.
- 6.9. In addition we would highlight that Crawley Borough Council, Reigate & Banstead Borough Council and Mid Sussex District Council are in the process of undertaking a water cycle study. Given the planned duration of the DCO we would welcome consideration of the initial findings in this study in the assessment of impacts of the proposed Project.

Proposed mitigation/ works

- 6.10. The Council notes that as part of the Project, GAL is proposing to extend the existing culvert beneath the main and northern runway; that a number of projects are proposed to the existing surface water drainage infrastructure; that three additional pumping stations are proposed and upgraded capacity to the existing pipelines are proposed; and that potentially there may be a need for a new wastewater treatment plant. The Council notes that no information has been provided within the EIA Scoping Report as to the proposed location of these improvements and would expect to see evidence of the need for these facilities and clarity regarding the proposed location of these facilities.

⁹ Available at:

[http://www.reigate-banstead.gov.uk/info/20381/emerging_planning_policy/761/dmp - evidence](http://www.reigate-banstead.gov.uk/info/20381/emerging_planning_policy/761/dmp_-_evidence)

7. Traffic and Transport

- 7.1. With regards to the scope of the assessment for traffic and transport, the Council notes that GAL are proposing to assess all modes of surface transport and take into consideration passenger, staff, goods, construction and operational journeys¹⁰. We also note that GAL is not proposing to scope out any issues or effects with regards to traffic and transport¹¹. However, given that a number of key transport corridors to the airport pass through the borough (the London to Brighton Mainline, the A23/M23, the North Downs Line and the M25), the Council is concerned to ensure that the proposed Project does not give rise to unacceptable impact upon transport routes in the borough, that pass through our borough or are immediately adjacent to our borough, and that adequate mitigation is secured. We therefore have the following comments.

Policy and legislative context

- 7.2. Following the adoption of the DMP on 26th September, references to the “emerging Reigate & Banstead Borough Development Management Plan 2018-2027” should be amended to “Reigate and Banstead Development Management Plan (Reigate and Banstead Borough Council, 2019)” to ensure consistency with other adopted Local Plan documents.
- 7.3. Also following the adoption of the DMP references to the following saved Borough Local Plan Policies should be removed from Paragraph 7.6.1 of the EIA Scoping Report:
- M04 “Development Related Funding for Highways Schemes”
 - M05 “Design of Roads”
 - M06 “Servicing Provision”
 - M07 “Car Park Strategy & Standards”

Proposed scope of the modelling studies

- 7.4. We note GAL is proposing to use SATURN software and the SERTM strategic highway model to assess the strategic highways impacts and three VISSIM traffic simulation models and a Corridor Model to assess the local highways impact. Given that Surrey County Council are the transport authority responsible for roads within

¹⁰ Paragraph 7.6.27 EIA Scoping Report

¹¹ Paragraph 7.6.67 EIA Scoping Report

Reigate & Banstead and given that a number of the key transport routes to the airport more generally pass through Surrey, the models need to take into consideration Surrey County Council's SINTRAM 7 using OMNITRANS model.

- 7.5. In relation to the SERTM model, we note that as the Gatwick Airport version of SERTM has not yet been developed and finalised it cannot yet be used to determine the area over which significant changes to travel demand flows are likely. This means that the assessment of the extent of the network over which mitigation has to be considered will be less accurate. This means, for example, that the local highway network such as the A23 London Road (in Reigate & Banstead) close to the Airport is not included within the scoping area. Given that it is likely to be affected by the Project, we expect GAL to complete their assessment and identify what mitigation measures are required before the scoping area is finalised.
- 7.6. We also note that Paragraph 7.6.37 which discusses the Corridor Model states that “in 2016, the Corridor Model was recalibrated based on an extensive data collection exercise. Calibration of the 2016 Corridor Model shows that the model satisfies WebTAG requirements ...” and that Paragraph 7.6.38 states that “given this high degree of calibration and validation, the updated 2016 Corridor Model is considered a robust base to take forward and uplift for future analysis of impacts”. Given the potential for transport impacts associated with the Project, the Council seeks confirmation that the transport authorities responsible for the strategic and local highways (namely, Highways England, West Sussex County Council and Surrey County Council) are satisfied with the use of this model and the assumptions made.

Proposed scope of baseline information

- 7.7. The Council considers that the information provided in Table 5.4.1. of the EIA Scoping Report provides a useful summary of the key parameters of the proposed Project. This will be useful in assisting in modelling of future impacts if current generations and impacts on the existing levels are known. Where data does not exist on current impacts/ generations, the Council considers that this needs to be gathered as soon as possible in order for the transport impacts of the surface access strategy to be properly understood/ assessed and then mitigated.

- 7.8. In relation to data collected so far, we would welcome clarity regarding the dates on which traffic counts have been collected¹². We are concerned that the M23 Smart Motorway Works may have impacted upon the traffic counts. We also consider that the scope of the baseline information should be extended to include contribution from housing sites (planning permissions and allocations) of less than 100 units as in a constrained area like Reigate & Banstead, housing completions from smaller sites represent a major component of housing supply¹³ and any modelling which does not factor in the contribution from small sites therefore risks significantly underestimating cumulative impacts.
- 7.9. With regards to the proposed information to be included within the future baseline conditions, the Council notes that Paragraph 6.2.5 states that “a number of improvements are proposed at Gatwick Airport to accommodate the predicted increase in passenger numbers in the absence of the Project” and that “the likely timing of these improvements will be taken into account through the use of future baseline scenarios and assessment years”. The Council would welcome clarity as to the nature of the proposed improvements and their planning status (i.e. whether they are consented or are ambitions). If they are not consented, we consider that they should not be included within the Future Baseline Conditions.
- 7.10. Also with regards to the proposed information to be included within the future baseline, we note that Paragraph 5.2.5 of the EIA Scoping Report states that robotics will be used to increase capacity of long stay carparks by 2,500 spaces. We seek clarity regarding whether this constitutes ‘development’ which requires consent. If so we do not consider that this additional capacity should be considered within the baseline.

¹² We note Paragraph 7.6.5 states that “Gatwick undertook an extensive count data collection exercise in June 2016 which included automatic traffic counts, manual classified link and turning counts and automatic number plate recognition (ANPR) counts” and note that this potentially accords with the Department for Transport’s (2019) Web Transport Assistance Guidance Unit 1.2 “Data Sources and Surveys” which advises that surveys, including automatic traffic counts and manual classified counts and surveys should be carried out during ‘neutral’, or representative months avoiding main and local holiday periods, local school holidays and half terms and other abnormal traffic periods. The guidance considers that Monday-Thursdays in June are ‘neutral’ and therefore the data collected so far may be in accordance with the guidance, but we would welcome clarity

¹³ Local authorities have recently been asked to provide GAL with information on sites allocated and with planning permission on sites for 100 or more units. Within Reigate & Banstead sites of less than 100 units contribute significantly to our housing supply. See Housing Delivery Monitors available at:

http://www.reigate-banstead.gov.uk/info/20280/plan_monitoring/31/housing_delivery_monitors

- 7.11. In relation to Paragraph 7.6.6 of the EIA Scoping Report we consider that current employee travel patterns should also be considered.

Proposed assessment years

- 7.12. The Council notes that GAL are proposing to assess the transport impacts at 2026 to accord with the proposed opening of Heathrow Airport R-3 and the proposed first full year of operation of the routine use of the northern runway; 2029 to accord with the anticipated date of peak slots on the northern runway being filled; 2030 to assess the implications of a potential later opening date of Heathrow R-3; and 2039 to accord with the design year when all proposed airside and landside work is anticipated.
- 7.13. The Council notes that these proposed assessment years do not correspond with the proposed construction period. Given that Paragraph 5.3.20 states that “it is anticipated that construction would require an average workforce of approximately 700 personnel, with up to approximately 2,000 personnel during the peak construction period”, the Council considers that the scope of the assessment should include at least one additional assessment year to take into consideration the peak impact of construction.
- 7.14. We also consider that the scope of the assessment should include at least one additional assessment year to take into consideration the proposed early growth at Heathrow airport (25,000ATMs from 2022), especially considering that this timeframe corresponds with the beginning of construction works for the proposed routine use of the northern runway, no surface access improvements are being proposed by Heathrow to facilitate this proposed early growth and that a number of the key transport links around Heathrow and Gatwick are the same roads/ link (and that these roads pass through our borough). We consider that this should be 2023 to take into consideration a full year of proposed early growth and construction at Gatwick.
- 7.15. We also question whether there is a need for an additional assessment year later in the 2030s to assess what would happen if Heathrow R-3 didn't open. Whilst the Council recognises the planning policy context behind the proposed expansion of Heathrow¹⁴, the Council question whether there¹⁴ is a need for such an assessment

¹⁴ namely that on 25th October 2016 the government announced that its preferred scheme to deliver additional airport capacity in the South East was a northwest runway at Heathrow; that following public consultation the government has produced a Airports National Policy Statement (ANPS) which outlines the government's policy on the need for new airport capacity in the South East; and that under s.104 of the Planning Act (2008) the Secretary of State must decide any application in accordance

given recent comments by government and given that the information provided as part of the EIA Scoping Report suggests that if Heathrow was delayed there would be additional growth at Gatwick.

Proposed study area

- 7.16. With regards to the proposed study area, we note that Paragraph 7.6.36 of the EIA Scoping Report states that the assessment of the impact of traffic from the proposed Project on local roads will taken into consideration on “the A23 London Road into North Crawley ... roads connecting to the Manor Royal estate and the A2011 Crawley Avenue to Hazelwick Roundabout”. We consider that the study area should also take into consideration the impact on the local roads within Reigate & Banstead (and Surrey more generally) including the impact on the A217, A23, B2036 and A264/A22 given that these are key local transport routes (including key local transport routes to the airport) and that past experience suggests that disturbance on the strategic network severely impacts these routes as people use re-route onto local roads to access the airport.
- 7.17. We welcome consideration of the potential impact of the Project on the North Downs line which passes through our borough. The North Downs line travels north of Gatwick to Redhill and then west to Reigate and then out of our borough to Reading. However, we would expect any assessment to consider the interaction between the North Downs line and the road network in Reigate, specifically in respect of Reigate level crossing. At Reigate the North Downs Line crosses the A217 which is a main strategic route from the M25 to Reigate and Redhill and serves the A25 and A23. As discussed during the Airports Commission work¹⁵, downtime of the Reigate level crossing causes significant congestion and severely impacts traffic flow within the town and traffic travelling south from Junction 8 of the M25 strategic road network. We would therefore request that the scope of the assessment is expanded to include the possible knock on impact of any capacity improvements on the North Downs line on the A217 (and - indirectly as a result of congestion – on the M25), particularly as

with the ANPS Unless s/he is satisfied that to do so would be unlawful, lead to the UK being in breach of its international obligations, lead to the Secretary of State being in breach of any duty imposed by or under any legislation, result in adverse impacts of the development outweighing its benefits or be contrary to legislation about how decisions are to be taken.

¹⁵ See for example our response to Airports Commission Consultation Document November 2014

http://www.reigate-banstead.gov.uk/download/downloads/id/1199/reigate_and_banstead_borough_council_response_to_airports_commission_consultation_january_2015

the A217 is a key alternative route to Gatwick Airport from the north in the event of incidents on the M23.

Effects proposed to be assessed

- 7.18. The Council considers that the scope of the effects proposed to be assessed for 'use of the airport including upgraded highway junctions' should be expanded to include changes in vehicular kilometres driven given the significant additional carparking proposed.
- 7.19. With regards to Paragraph 7.6.47 of the EIA Scoping Report which details the effects to be assessed within the PEIR/ES, the Council notes that whilst the IEA Guidelines are appropriate for the environmental assessment of the impacts of additional traffic on network, that they are not necessarily transferable to the assessment of other impacts on the network in terms of performance. The scope of the assessment therefore also needs to take into consideration the consequential need to mitigate these.

Wider assessment of traffic and transport

- 7.20. The Council considers that given the substantial increase in parking provision planned, that the scope of the wider assessment of traffic and transport detailed within Paragraph 7.6.61 of the EIA Scoping Report should also include an assessment of the potential increases in kilometres travelled as a result of the end state scenario when compared with the base.

Approach to mitigation and monitoring

- 7.21. The Council notes that GAL is proposing a number of mitigation measures in order to offset the potential impact of the proposed Project. The Council is however disappointed that much of these measures are soft/ management type measures and that there is an absence of hard infrastructure and service provision measures referred to.
- 7.22. With regards to the mitigation methods proposed, the Council notes that the majority are from the Airport Surface Access Strategy (ASAS). The Council would welcome clarity regarding the status of the ASAS given that the Council understands that the ASAS referred to in the EIA Scoping Report, available on GAL's website and referred to in the masterplan is the draft ASAS which was produced in May 2018 and

circulated to local authorities for comment. We subsequently provided comments on this document but our understanding is that they have not been taken into consideration/incorporated into a final ASAS. Our understanding is also that comments provided by residents, town and parish councils, business representatives etc. who made comments on the draft ASAS as part of the masterplan consultation have not been taken into consideration and note that Paragraph 4.20 of the National Aviation Strategy (2013) states that “local people, town and parish councils which have qualifying airports within their boundaries, business representatives, health and education providers, environmental and community groups should be involved in the development of airport surface access strategies” and the Aviation 2050: The Future of UK Aviation Consultation Document highlights the importance of ASAS and their role in setting targets for modal share and environmental targets¹⁶.

- 7.23. With regards to the mitigation methods proposed in the ASAS, the Council notes that bullet point 8 of Paragraph 7.6.63 of the EIA Scoping Report which discusses mitigating the impacts of increased carparking on the airport states that “GAL is committed to providing all of the carparking required for the Project on Gatwick land whilst working with local planning authorities such as Crawley Borough Council to reduce unauthorised off-airport parking and to re-provide this on-airport in line with GAT3 [of Crawley Borough Council’s Local Plan] commitments”. The Council would welcome clarity as to how this would work in practice, for example whether GAL is proposing a mechanism by which additional on-site parking is only permitted following the closure of off-site spaces (both authorised and unauthorised).
- 7.24. The Council would also welcome clarity regarding the practicality of how GAL is proposing to bring construction materials to and from the site by rail. Whilst we note – and welcome - GAL’s commitment to “delivering as much of the construction associated with the Project as is practicable by sustainable modes”¹⁷, we are concerned that opportunities to bring construction materials to and from the site by rail¹⁸ would require a rail head. We therefore question the practicality of this (for example where a railhead would be located/ whether the deliverability of a railhead is feasible etc.) and consider that the scope of the assessment should consider the likely scenario of a railhead not being delivered and the majority of construction materials being delivered by road.

¹⁶ Paragraph 4.37

¹⁷ Paragraph 7.6.66 EIA Scoping Report

¹⁸ As stated in Paragraph 7.6.66 EIA Scoping Report

7.25. The Council also notes that the Gatwick Area Transport Forum only meets annually and is not a consultative body. Instead we consider that the Gatwick Area Transport Forum Steering Group which meets quarterly provides a more suitable forum for consultation and coordination of approach to delivering transport objectives and initiatives.

Modal shift

7.26. The Council questions whether the scope of the assessment should include a more ambitious modal shift. We note that Gatwick's ongoing sustainability objective with regards to surface access is to "increase sustainable access options for passengers and staff"¹⁹ but that GAL only intends to increase their passenger modal shift by 4% (from a current 44% to 48% by 2022). We question how ambitious this is given that the already consented capacity growth on the railway station will be delivered by 2022 and that 2022 is before the proposed commencement of the routine use of the northern runway. We also question how likely it is to be achieved once the proposed Project is completed given the scale of carparking proposed (an additional 17,500 parking spaces on site on top of an already committed 6,750 additional parking spaces proposed/consented for continued one runway operation); that the ASAS commits GAL to reducing staff parking²⁰ which will lead to further passenger parking as current staff parking is made available for passenger parking; and that Paragraph 5.2.52 of the EIA Scoping Report suggests that GAL are not planning for additional rail capacity to accommodate the proposed passenger growth associated with the routine use of the northern runway²¹.

Planned improvements

7.27. Following on from concerns in the previous section regarding the scale of parking proposed, the Council would welcome more clarity as to the location of the proposed additional carparking given that this will impact upon traffic movements and therefore needs to be accounted for in the traffic modelling. We also note that Paragraph 5.2.43 of the EIA Scoping Report states that some of the existing carparking provision will need to be demolished to make way for other development and

¹⁹ Paragraph 5.2.68 EIA Scoping Report

²⁰ pp.40

²¹ Paragraph 5.2.2 states that "studies will be undertaken to explore the need for further improvement to the rail station, but taking into account the improvements that are currently planned, it is not currently considered that any further improvements will be required to the rail station platforms or concourse".

reprovided elsewhere on the site; we would therefore also welcome clarity as to which carparks are proposed to be demolished and reprovided elsewhere given that this will also impact upon traffic movements.

- 7.28. We would also request additional clarity regarding the proposed scope of junction improvements and potential road widening given that land in our borough including the Riverside Garden Park and the Horley Business Park site allocation is identified in the for junction improvements. The Council notes that Paragraphs 5.2.48 and 5.2.49 of the EIA Scoping Report suggests that at-grade junctions may be required at both the northern and southern roundabouts. The Council considers that the scope of the assessment should include the potential for 0-2 at-grade junctions.
- 7.29. We also note that Paragraphs 7.6.12-7.6.15 and 7.6.20-7.6.21 of the EIA Scoping Report describe a number of transport improvements which have already been committed to/ planned including the railway expansion, new rolling train stock on services calling at the airport, new waiting areas for rail passengers, M23 Smart Motorway and Highways England's proposals to improve traffic flow on the M25. The Council notes that these projects are proposed to mitigate current problems and not facilitate additional capacity from any future growth at Gatwick Airport. This should be taken into consideration in the scope of the assessment.

Forecasting and modelling

- 7.30. The Council notes that there is considerable uncertainty within the location regarding the scale and location of future growth in the region beyond current local plans which end in the early-2030s. In the absence of a long-term strategic land use plan, we consider that there is a need for GAL to consider a range of potential future growth scenarios and at the very least undertake a cumulative assessment of the worst case.

Construction Logistics Consolidation Centre

- 7.31. The Council notes that Paragraph 5.3.14 of the EIA Scoping Report states that "a temporary logistics facility may be required in order to allow scheduling of deliveries to the appropriate work sites" and that Paragraph 5.3.15 states that "the use of a logistics facility would allow HGV deliveries to the airport to be consolidated, reducing the overall number of deliveries on the local road network". The Council would welcome clarity as to whether a construction logistics consolidation centre will be

required, and if so where it will be located as if it does not have internal access to the airfield and the main construction locations then it will not reduce the overall number of deliveries on the local road network but cause additional secondary journeys on the local road network around the airfield.

Horley Strategic Business Park

- 7.32. The Council considers that it is encouraging that Paragraph 5.2.48 of the EIA Scoping Report recognises that any improvement scheme should take into consideration the allocated Horley Strategic Employment Site to the north of the southern roundabout, but considers that consideration of this planned development should also be taken into consideration in the assessment stage.
- 7.33. With regards to traffic and transport assessments, the Council would welcome some clarity regarding what assumptions have been made regarding the Horley Strategic Business Park²², namely assumptions regarding:
- i. Access to the strategic road network
 - ii. Timeframes for the construction and operation of the business park
 - iii. Proposed operational uses (uses, quantities of floorspace, job numbers)²³
 - iv. Proposed construction phasing
 - v. Proposed road improvements
 - vi. Modal shift during both construction and operation
 - vii. The requirement for the land for road improvements and construction works
- 7.34. The site allocation in the DMP requires “a new dedicated, direct access onto the strategic road network (M23 spur)”. As part of the proposed Project, GAL includes the southern part of the site (which would deliver the access onto the strategic road network) in their Project site area. Given this, the Council would welcome clarity regarding whether the proposed inclusion of this land in the site boundary will prevent the business park from being developed. We would also question what other sites have been looked at for temporary construction use and expect strong justification to be provided as to why this site has been chosen given its existing site allocation.

²² A site allocation in the Council’s adopted DMP for approximately 200,000sqm of predominantly B1a office accommodation with ancillary uses to primarily meet the strategic office needs of Reigate & Banstead and Crawley Borough Council

²³ DMP Policy HOR9 “Horley Strategic Business Park” requires “the development of the site [to] be in accordance with an agreed masterplan, produced by the site promoter in consultation with the Council... the masterplan will be submitted at the outline planning application stage to assist the consideration of subsequent planning application (s) and must include phasing, programming of infrastructure and details on quantum of development and appropriate uses”.

- 7.35. If the inclusion of this land within the Project site boundary doesn't prevent the business park from being developed, the Council would welcome clarity as to whether it will impact upon the timeframe for the construction and operation of the business park. The site is being developed by Horley Business Park Ltd. which is a joint venture in which Reigate & Banstead Borough Council is a partner, the developers are currently in the process of preparing for the submission of a planning application, however we note that in Figure 5.2.1f of the EIA Scoping Report the southern part of the site is proposed to be used for construction and that Paragraph 6.2.9 of the EIA Scoping Report states that construction will last from 2022 to 2034.
- 7.36. The Council would also welcome clarity regarding what assumptions are being taken into consideration with regards to proposed uses of the site. The local plan site allocation is for predominantly B1a accommodation with limited B1b, B8 and non-B Class uses including appropriate airport-related Sui Generis uses and ancillary retail, hotel and conference facilities, gym, crèche and medical services and that there is no definitive floorspace within the site allocation (although work undertaken for the DMP Examination suggested 200,000sqm)²⁴. Instead the policy allocation requires that a masterplan to be submitted at the outline planning application stage and for this to detail the proposed quantum of development and uses. We query what assumptions are being made given that the Business Park masterplan has not yet been agreed and that the Council (as part of the joint venture) has not been approached by GAL to discuss proposed uses/ floorspace.
- 7.37. Given this concern, we would also welcome clarity regarding what assumptions are being made regarding construction phasing given that this will be informed by the proposed uses/ scale of development and given that Policy HOR9 requires the Business Park masterplan to provide a detailed programme of infrastructure. Work undertaken by the Council's Planning Policy Team suggested that construction would

²⁴ Strategic Employment Site: Economic Assessment:

- Task 1: Supply and Demand Evidence:
http://www.reigate-banstead.gov.uk/downloads/file/3947/reigate_and_banstead_sesa_-_task_1_report_fc200917
- Task 2: Economic and Market Impact Analysis:
http://www.reigate-banstead.gov.uk/downloads/file/3945/reigate_and_banstead_sesa_-_task_2_report_fc200917
- Task 3: Executive Summary:

http://www.reigate-banstead.gov.uk/downloads/file/3946/reigate_and_banstead_sesa_-_executive_summary_report_cf240817

most likely take place over a twenty year period²⁵ and therefore there is a need to give proper consideration to construction phasing.

- 7.38. Also given the comments above with regards to the importance of delivering the business park in relation to meeting employment needs and the economic impact of not delivering the site, we consider that there is a need for GAL to provide strong justification for the inclusion of the business park land for road improvement and construction storage within the Project site boundary. We also question what other sites have been looked at for road improvement and construction storage and expect to see strong justification for the selection of this site given its existing site allocation.
- 7.39. The Council would also welcome clarity regarding proposed road improvements. We note that Paragraph 5.2.48 of the EIA Scoping states that “in order to cater for additional road traffic demand associated with the Project, together with traffic growth predicted to arise in the absence of the Project, it is assumed that a significant improvement scheme will be required at South Terminal roundabout ... the development options to improve this junction will also need to take account of other development proposals that may come forward in the local area. For the purpose of this Scoping Report, it is assumed that schemes up to and including grade separation of the roundabout may be considered. It is noted that this scale of improvement could also serve the planned business park on land to the north of the roundabout as identified in the Reigate and Banstead Local Plan (subject to planning consent for the business park)”. The Council has concern with the statement that *“for the purpose of this scoping report, it is assumed that schemes **up to** and including grade separation of the roundabout may be considered”* as during the DMP Examination there was extensive debate between the Council, the promoters of the Horley Business Park and GAL regarding the design of the junction for the southern roundabout irrespective of the growth associated with this Project. GAL insisted throughout the DMP examination that there was a requirement for a grade separated junction to accommodate the business park growth irrespective of any additional growth proposed at the airport²⁶ therefore we consider that there is a likelihood that

²⁵ *ibid*

²⁶We note for example that at Paragraph 6.4 GAL response to the Reigate & Banstead DMP Regulation 19 Publication they stated that it is “GAL’s position that the addition of trips generated by the new development, alongside growth in traffic associated with the airport, background trips and re-distribution following completion of the M23 Smart Motorway project, will require substantial improvements of the junction, including grade separation to remove conflict between east-west traffic and vehicles entering or exiting the development. Without this scale of improvement GAL does not believe the development is

will be a need for a grade separated junction to accommodate the proposed growth as a result of this Project.

Junction improvements

- 7.40. The Council notes that in addition to the highway junction improvements planned at the North and South terminal roundabouts that it is likely that further highways and transport improvements (not constrained to junctions) will be required off-site to meet the NPPF requirement of resolving severe residual cumulative impacts. We therefore do not consider that at this time the potentially significant impacts of the development on the transport network (and the subsequent required scope of mitigation measures required) have been fully assessed. We consider that GAL should complete the Transport Model and undertake a transport assessment before the scope of development is finalised. To ensure that the highway impacts of the proposed development are properly mitigated, we consider that there is a need to ensure that in designing highway improvements that this does not lead to traffic redistribution and create new congestion hotspots or exacerbate existing ones.

Railway improvements

- 7.41. The Council notes that planning permission has recently been granted to facilitate additional rail capacity and that Paragraph 5.2.52 states that “studies will be undertaken to explore the need for further improvement to the rail station, but taking into account the improvements that are currently planned, it is not currently considered that any further improvements will be required to the rail station platforms or concourse”. The Council notes that the current consented permission is to accommodate current use/ planned growth and not growth associated with the Project. We consider that this paragraph seems to pre-judge the outcome of the study work and consider that GAL should await the outcome of the study before confirming whether or not further improvements are needed and finalising the scope of the development.
- 7.42. The Council notes that Paragraph 7.6.12 of the EIA Scoping Report states that “train capacity serving Gatwick has more than doubled since 2014, with new rolling stock on most of the services calling at the airport. This provides sufficient overall capacity for Gatwick to continue to grow its rail mode share over the next decade”. We note

that this increase in capacity has not been shared equally across all routes as it occurred due to the increase in the capacity of the Gatwick Express and Thameslink services, whereas the capacity of Southern and GWR have remained fairly static. We note for example that there are no direct rail services to/from Kent even though this is an area which is assessed as part of the employment effects. We consider that there is a need for the study to establish if the capacity of the different routes (rather than just 'overall') is sufficient to at least the design year of 2038 or whether this is dependent on further investment in rail capacity, such as Network Rail's "Croydon Triangle" scheme which is not currently a committed scheme and therefore cannot be relied upon.

Bus services

- 7.43. The Council notes that Paragraph 7.6.14 of the EIA Scoping Report states that "Gatwick also has an extensive, 24 hour, local bus network provided by Metrobus". We however note that this is subsidised by GAL through the Sustainable Transport Fund. We consider that this should be acknowledged as it is not necessarily guaranteed to continue. More generally we consider that there is a need to clarify which local bus services are subsidised and set out whether there are plans to change levels of subsidy which could result in changes to bus service patterns.

8. Air Quality

Policy and legislative context

- 8.1. Following the adoption of the DMP on 26th September, references to the "emerging Reigate & Banstead Borough Development Management Plan 2018-2027" should be amended to "Reigate and Banstead Development Management Plan (Reigate and Banstead Borough Council, 2019)" to ensure consistency with other adopted Local Plan documents.
- 8.2. The policy and legislative context for air quality needs to also include Surrey County Council's Electric Vehicle Strategy and Low Emission Strategy.

Issues proposed to be scoped out of the assessment

- 8.3. The Council notes that GAL are proposing to scope out of the assessment of air quality:

- Pollutants that are listed in the Air Quality Standards Regulations 2010 (amended in 2016) other than No_x, NO₂, PM₁₀ and PM_{2.5}
- Odour emissions during construction
- Jettisoning of fuel from aircraft

8.4. From a Reigate & Banstead perspective, we are satisfied with the scoping out of these issues. We however have the following comments.

Proposed scope of the assessment

8.5. The Council considers that the scope of the assessment should include air quality impacts of airport generated road traffic on the A23 Hooley Air Quality Management Area (AQMA) given that a significant proportion of the airport's passenger traffic comes from London and is likely to access the airport via the A23/ M23 route out of London.

8.6. We also consider that for any assessment of air quality as part of the DCO process (regardless of the year under consideration) the scope of the assessment should include the following:

- i) Isopleth/ contour maps for each of the pollutants under consideration and for each of the assessment scenarios (baseline and with development), 2018, 2026, 2029 and 2038 given the construction of Pier 7 post-2032.
- ii) A table of concentrations of each pollutant for each assessed year (including 2038) at specific receptors/ points around the airport, which as a minimum includes all receptors used in previous air quality assessments of the airport (so as to ensure that the work is comparable to previous assessments of air quality in relation to the Horley AQMA).
- iii) For each of the points in (ii) above, a source apportionment breakdown that includes APU contribution, aircraft ground contribution, aircraft elevated contribution, ground support equipment, carparks, airside vehicles, airport related road traffic, non-airport related road traffic, and the background contribution. The Council considers that it is imperative that the contribution from airport related road traffic and non-airport related road traffic are presented separately.
- iv) A calculation of the years of life lost (not a relative or percentage change) due to the airport pollution for each of the assessment years under consideration,

both with and without the Project in place, using the latest COMEAP²⁷ report and DEFRA valuation of a life year lost as this will help interested parties clearly understand the air pollution health costs of the proposed Project.

- 8.7. The Council considers that given GAL's stated sustainability objective of 'improving air quality impacts using new technology, processes and systems'²⁸, the outputs from points iii) and iv) are particularly important to demonstrate to local residents that the airport is playing its part in reducing air pollution, and not relying on wider societal improvements to mask/ offset increasing pollution from its own estate as has been the case since 2012²⁹.
- 8.8. The Council notes that the EIA Scoping Report fails to acknowledge the emergence of airports as a significant source of ultrafine particulate pollution over the past eight years^{30,31} and that Gatwick is no exception to this³². While at this stage it would be impractical to expect the airport to model any such impact, the Council considers that it should recognise in its subsequent submission document that a potential issue does exist, and that to help mitigate any potential future risk from this pollutant that it will undertake long term monitoring to 2039 as a minimum, examining both particle number and the particle size distribution at a representative residential site downwind of the airport. This need for ultrafine particle monitoring in the vicinity of airports is in line with the recommendations of the Government's air quality expert group (AQEG)³³, and the Government's draft aviation strategy³⁴.

Proposed monitoring and mitigation

- 8.9. In order to mitigate against the potential air quality impacts of the proposed Project, and to check that any forecast pollutant concentrations subsequently occur in

²⁷ Associations of long-term average concentrations of nitrogen dioxide with mortality COMEAP.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/734799/COMEAP_NO2_Report.pdf

²⁸ Paragraph 5.2.68 EIA Scoping Request

²⁹ S Air Quality Report to GATCOM steering Group – June 2019: Appendix C – Figure C.1 http://www.gatcom.org.uk/wp-content/uploads/2019/07/Item14_AQreport2018.pdf) and that this could continue going forward given the anticipated improvement in background NO_x over the next 10-20 years.

³⁰ Atmospheric Environment 45 (2011) pp.6526 – 6533.

³¹ Atmospheric Environment 50 (2012) pp.328 – 337.

³² Report on Ultrafine Particulate Pollution around Gatwick to the GATCOM steering Group – June 2019: Table 1. <http://www2.westsussex.gov.uk/ds/ctee/gat/gat180719i6a.pdf>

³³ AQEG Ultrafine Particles (UFP) in the UK. – July 2018. pp.11, and pp.94 Section 7.1 Paragraph 2.

³⁴ Aviation 2050: The Future of UK Aviation. pp.82.

practice, we expect GAL to continue to fund a programme of long-term monitoring of air pollution (NOx, PM10, as a minimum) at residential sites downwind of the airport. We would welcome such certainty stated in the ES.

9. Noise and Vibration

- 9.1. The Council welcomes recognition within the EIA Scoping Report from GAL that noise is an area of concern for local communities³⁵, that areas to the south of Horley are communities which are most affected by noise³⁶ and notes that GAL's goal is "to limit effects as far as practicable"³⁷.
- 9.2. Given that the airport is situated immediately adjacent to southern boundary of the airport and that key transport routes to the airport pass through the borough and planes overfly the borough we are concerned to ensure that the potential increase in noise due to increased passenger numbers, air traffic movements and cargo movement is properly understood and mitigated.
- 9.3. The Council has no noise and vibration expertise and instead relies upon Crawley Borough Council to provide noise and vibration expertise. We therefore support comments provided by Crawley with regards to noise and vibration.

Policy and legislative context

- 9.4. In the list of policies and legislation for noise and vibration, the following policy is omitted:
- DMP Policy OSR1 "Urban Open Space"
- 9.5. Following the adoption of the DMP, references to the "emerging Reigate & Banstead Borough Development Management Plan 2018-2027" should be amended to "Reigate and Banstead Development Management Plan (Reigate and Banstead Borough Council, 2019)" to ensure consistency with other adopted Local Plan documents.

³⁵ Paragraph 7.8.16 EIA Scoping Report

³⁶ Paragraph 7.8.34 EIA Scoping Report

³⁷ Paragraph 7.8.16 EIA Scoping Report

- 9.6. Also, following the adoption of the DMP, saved Borough Local Plan Policy Hr19 “Development Affected by Noise” should be removed from Paragraph 7.8.1 of the EIA Scoping Report.

Issues proposed to be scoped out of the assessment

- 9.7. The Council notes that GAL is proposing to scope out the following from the assessment of noise and vibration:
- Areas designated as Local Green Spaces and areas identified as Quiet Areas through the implementation of the Environmental Noise (England) Regulations 2006.
 - Noise from auxiliary power units
 - Vibration impacts from the construction works and during the operational phase
 - Operational traffic vibration
- 9.8. We are satisfied that Local Green Spaces and areas identified as Quiet Areas are proposed to be scoped out of the assessment as there are non such areas within our borough. We however have a local designation of Urban Open Space (DMP Policy OSR1) (green open space areas in urban areas which are highly valued for a number of different purposes including their opportunity for recreation and visual contribution to the character of an area) which we consider should be taken into consideration in the assessment of noise and vibration impacts.

Proposed scope of the assessment

- 9.9. The Council welcomes consideration of the potential overflight of planes in the scope of the EIA as the borough is severely impacted by overflight. We note that the potential for overflight of the borough as a result of airspace modernisation programmes may increase and therefore, whilst we appreciate that the results from the airspace modernisation programme are unknown at this time, we consider that they should be taken into consideration at some point in the DCO process should it proceed given that they will be in operation at the time of the proposed routine use of the northern runway.
- 9.10. We also consider that the assessment of noise and vibration should give consideration to any emerging airspace modernisation programmes required for the dual runway operation. Whilst we note that Paragraph 7.8.7 of the EIA Scoping Report states that “any noise impacts of the Project will be the result of increases in

noise due to the increased number of flights on the northern runway, rather than new noise impacts over areas previously unaffected” and that “this will therefore avoid the noise impacts often associated with new flight paths” at the most recent Socioeconomics Topic Working Group facilitated by GAL it was stated by GAL representatives that the routine use of the northern runway in addition to the ‘main’ runway may require an airspace change. The Council would therefore welcome clarity as to whether an airspace change is required and if so expects consideration of the potential impact of this airspace change in the assessment of noise and vibration.

- 9.11. We also consider that the impact of the proposed Heathrow early growth (25,000 ATMs from 2022 onwards) should be taken into consideration in the assessment of noise and vibration given that Heathrow planes also overfly Reigate & Banstead.

Proposed baseline information

- 9.12. The Council notes - and welcomes - GAL’s proposal to undertake additional noise assessments at the Riverside Garden Park and in the vicinity of the North and South terminals. We however note that any current assessments would be impacted by the ongoing M23 Smart Motorway improvements and would welcome clarity as to what assumptions will be made regarding the impact of the M23 Smart Motorway improvements on the assessment of noise and vibration on land in the Riverside Garden Park and land in the vicinity of the North and South terminals.
- 9.13. We note that Paragraph 7.8.10 of the EIA Scoping Report states that “the baseline for the air noise assessment will be the 2018 summer season (16 June to 15 September)”. We also note that Paragraph 7.8.7 of the EIA Scoping Report states that “in 2018 the northern runway was used by 3,534 flights”. We would therefore welcome clarity as to whether any assumptions will be made to take into consideration the use of the northern runway in the baseline air noise assessment.

Scope of the assessment

- 9.14. The Council questions whether the scope of the assessment should also take into consideration noise metrics during the shoulder periods. We note that Paragraph 7.8.32 of the EIA Scoping Report states that all noise metrics used to assess the potential impact of increased flights on air noise will relate to the 92 day summer period (16 June to 15 September) as conventionally in the UK this represents the

busiest, and hence noisiest, season but note that through the Project, only minor additional movements are expected during the summer periods and that the majority of growth is expected within the shoulder periods.

- 9.15. Similarly, we note that Paragraph 7.8.38 of the EIA Scoping Report states that “a comprehensive noise survey of aircraft taxiing noise levels has recently been carried out (March-May 2019) and the results of this will feed into the ground noise model”. Whilst this time period relates to some of the shoulder period in which the greatest anticipated growth is expected, we note that this doesn’t take into consideration the remainder of the shoulder period which is expected to see the greatest increase in air traffic movements nor the summer season. We therefore question whether the scope of the assessment should also take into consideration noise metrics during the remainder of the shoulder period and the summer period in order to fully understand – and hence mitigate – the potential ground noise impacts through the routine use of the northern runway.
- 9.16. In terms of road traffic noise during construction, we note that Paragraph 7.8.44 of the EIA Scoping Report states that “the assessment of construction traffic noise will be based on a period of peak traffic flow”. We do not consider that this is sufficient given that Paragraphs 5.3.17 and 5.3.18 of the EIA Scoping Report state that the greatest construction will be scheduled during the night-time period in close proximity to residential areas (i.e. during a noise sensitive time outside of peak traffic flow).
- 9.17. Also with regards to the scope of the assessment and road traffic noise, we note that through the routine use of the northern runway GAL is anticipating a growth in cargo movements. Whilst we note that the airport previously had much higher cargo throughput and that the facilities still existing on-site to accommodate this throughput we understand that GAL no longer has access to these facilities as they have been sold to SEGRO. We would therefore seek clarity as to whether the scope of the assessment will take into consideration the potential noise impacts of increased HGV movements to cargo facilities on/ off-site.
- 9.18. With regards to assumptions made to assess the potential impact of noise during the operational phase, we note that GAL are proposing to assess the night noise component of the planned development assuming that the current Department for Transport’s night movement quota is in place when the Project is completed³⁸ and

³⁸ Paragraph 5.2.72 EIA Scoping Report

that the northern runway will only be used for Code C or smaller aircraft³⁹. These assumptions will need to be conditioned as part of the DCO for future operations.

Proposed mitigation

- 9.19. The Council would welcome clarity as to whether the proposed mitigation associated with the construction phase via a s.61 Environmental Health Application will form part of the DCO application.
- 9.20. The Council would also welcome clarity regarding the proposed location, design and height of the proposed new noise bund/ buffer⁴⁰.
- 9.21. The Council welcomes consideration of the enhancement of the Noise Insulation Scheme. In line with Crawley Borough Council's response, we consider that this should mirror or be better than Crawley Borough Council Local Plan Policy ENV11 "Development and Noise".
- 9.22. Following the GAL-facilitated Noise Topic Working Group, we would welcome clarity as to whether a noise envelope will be used. We are concerned that if one is used based on LAeq that it will not properly assess the potential impact of increased overflight and consequently this will impact upon the scale of mitigation required/proposed.

10. Climate change and carbon

Policies and legislative requirements

- 10.1. Following the adoption of the DMP, references to the "emerging Reigate & Banstead Borough Development Management Plan 2018-2027" should be amended to "Reigate and Banstead Development Management Plan (Reigate and Banstead Borough Council, 2019)" to ensure consistency with other adopted Local Plan documents.
- 10.2. References to saved Borough Local Plan Policy Hr2B "Quality & Sustainable Development (within Horley)" also needs to be removed from the policies and legislative requirements section following adoption of the DMP.

³⁹ Paragraph 7.8.7 EIA Scoping Report

⁴⁰ Paragraph 5.2.32 of the EIA Scoping Report states that as part of the Project, an existing noise bund in the western end of the airfield will be removed but the functionality of the bund would be re-provided.

Issues proposed to be scoped out of the assessment

- 10.3. The Council notes that GAL is proposing to screen out:
- The vulnerability of the Project to sea level rise
 - GHG emissions from the CCD stages for inward flights
 - LTO emissions in the vicinity of other airports.
- 10.4. The Council notes that the justification for excluding GHG emissions from CCD stages for inward flights is that “these emissions are outside the scope of influence of the Project as the Project does not include changes to airspace...”⁴¹. Given our previous comments regarding airspace modernisation, we consider that there is a need to take into consideration GHG emissions from CCD stages for inward flights.

Proposed scope of the assessment

- 10.5. The Council would welcome clarity as to whether non CO₂ radiative forcing effects (including water vapour, contrails, NOX, etc.) will be taken into consideration in the scope of the assessment of carbon. If not this will result in a significant change in the figures presented in the final assessment⁴².

Presentation of the findings of the assessment

- 10.6. In terms of the presentation of the findings, we note that Paragraph 7.9.34 of the EIA Scoping Report states that “it is proposed that the findings of the assessment of effects on climate change and carbon would be set out as a topic chapter within the ES, supported by technical appendices where appropriate”. In order to understand the non CO₂ radiative forcing effects, we would find it helpful if a table were included within the chapter which specifically details the non CO₂ radiative forcing impact.

11. Socio-Economic Effects

Policies and legislative requirements

⁴¹ Paragraph 7.9.88 EIA Scoping Report

⁴² See Government Greenhouse Gas Conversion Factors for Company Reporting: Methodology Paper for Emissions Factors Final Report – August 2019. pp.86 Paragraph 8.39.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/829336/2019_Green-house-gas-reporting-methodology.pdf

- 11.1. Following the adoption of the DMP, references to the “emerging Reigate & Banstead Borough Development Management Plan 2018-2027” should be amended to “Reigate and Banstead Development Management Plan (Reigate and Banstead Borough Council, 2019)” to ensure consistency with other adopted Local Plan documents.
- 11.2. Also following the adoption of the DMP, reference to saved Borough Local Plan Policy Em11 “Airport Related Development” should be removed from t Paragraph 7.10.1 of the EIA Scoping Report following adoption of the DMP

Issues proposed to be scoped out of the assessment

- 11.3. The Council notes that GAL is proposing to scope out:
- Effect of the Project on the population during the construction and operational phases;
 - Effect of the Project on Foreign Direct Investment (FDI) and trade; and
 - Effect of the Project on property value
- 11.4. The Council has significant concerns with the proposed scoping out of all three of these fundamental and important issues for the following reasons.

Effect of the Project on the population during the construction and operational phases

- 11.5. We note GAL proposes to exclude from the scope of the assessment the effect of the Project on the population during the construction and operational phases as:
- The Project does not propose any residential development and therefore it is not anticipated that it would directly give rise to population effects either during the construction or operation, in terms of changing population levels within the assessment areas.
 - Future labour demand will be distributed across a wide labour catchment area so no significant impacts on population levels or housing and community infrastructure needs are expected⁴³.
- 11.6. We strongly consider that the effect of the Project on the population during the construction phase should be included within the scope of the assessment given:

⁴³⁴³ Paragraph 7.10.24 EIA Scoping Report

- GAL anticipates a twelve year construction programme and an average construction workforce of 700 personnel (rising to 2,000 during peak construction)⁴⁴.
- The specialist nature of construction suggests a need for a specialised construction workforce.
- The tight local labour market (as referenced in Paragraph 7.10.7 of the EIA Scoping Report) means that the local economy will not be able to provide the construction workforce required to deliver the Project.
- Table 7.10.2 of the EIA Scoping Report recognises that there will be an “introduction of a temporary construction workforce”.

11.7. Furthermore, we also strongly believe that the effect of the Project on the population during the operational phase should be included within the scope of the assessment given that:

- Whilst no housing development was planned as part of second runway scheme proposed by GAL as part of the Airports Commission (Gatwick R-2), the potential impact on population was scoped into the assessments. We note that Paragraph 4.1 of the *A Second Runway for Gatwick Appendix A4: Local Economy Impacts* report produced as part of the airports commission work states that “a second runway will ... increase labour demand in the study area. Dependent on what occurs (or what assumptions are made) in relation to factors such as commuting, unemployment and growth in the working population in the study area, this could result in an increase in in-migration, a growth in the number of households and an increased need for housing” and that GAL assumed as part of their economic assessment of the potential impact of the second runway a ratio of around one additional house per 1.6 additional jobs (we also note that the Airports Commission assumed a ratio of one additional house per additional job)⁴⁵. No justification has been provided within the Scoping to deviate from this approach.
- Paragraph 7.10.7 of the EIA Scoping Report demonstrates already high economic activity rates and low unemployment in the local study area suggesting that improvements in economic activity/ unemployment cannot be relied upon to absorb the anticipated job growth. Additional population will

⁴⁴ Paragraphs 5.3.20 and 6.2.9 EIA Scoping Report

⁴⁵ Paragraph 5.7 GAL Response to Airports Commission Consultation Appendix 7

https://www.gatwickairport.com/globalassets/publicationfiles/business_and_community/all_public_publications/second_runway/airports_commission_july15/7---rps-optimal-local-economy--housing---ac-submission.pdf

therefore inevitably be required to support the additional labour demand, with consequential housing impacts.

- Figure 7.10.3 of the EIA Scoping Report shows that the greatest number of people working at the airport live within the boroughs/ districts immediately adjacent to the airport (Crawley, Reigate & Banstead, Mole Valley, Tandridge, Horsham and Mid Sussex), therefore the assertion that “future labour demand will be distributed across a wide labour catchment area so no significant impacts on population levels or housing ... are expected” is not only untested at this stage but also manifestly flawed given the existing evidence available.
- 11.8. We also consider that there is a need for the scope of the assessment to include the potential impact on population and housing during both the construction and operation phase given the tight local housing market – host authorities of Crawley and Reigate & Banstead have recently adopted local plans which are unable to meet objectively assessed housing needs due to long-recognised planning, environmental and geographic constraints and host authority of Tandridge has an emerging local plan currently at examination which suggests that it is also unable to meet its standard method housing need.
- 11.9. In summary, we consider that the omission of population and consequential housing impacts from any future assessment is a seriously and fundamental flaw within the Scoping which must be resolved.

Effect of the Project on FDI

- 11.10. The Council notes that GAL is proposing to scope out the effect of the Project on FDI and trade as “Government guidance (Department for Transport, 2016) notes that there is not sufficient evidence to quantify the impact of FDI, and as such does not currently provide guidance for analysis of such impacts” and that “in the absence of an established methodology and guidance, it is proposed that these impacts are scoped out of the assessment”⁴⁶. The Council however considers that the potential impact of FDI should be considered given that:
- It was considered as part of the economic impact analysis for the second runway Airports Commission work⁴⁷ and no evidence has been provided for taking a different approach for this project.

⁴⁶ Paragraph 7.10.24 EIA Scoping Report

⁴⁷ See for example

- Heathrow proposed scoping out ‘the effects of increased trade, FDI and tourism to the UK as a result of improved connectivity and aviation capacity’ and the Planning Inspectorate considered that they should not be scoped out⁴⁸.
- Neither Luton nor Manston proposed screening out the effect of their airport capacity projects on FDI for this reason.
- GAL is anticipating expansion into the emerging markets of India, Asia and Africa. Such expansion will open up new trading links and therefore likely bring FDI into the local economy.

Effect of the Project on property value

11.11. The Council notes that GAL proposes excluding the effect of the Project on property value within the Project site boundary as “the value of property is variable due to the multiple drivers that can influence residential and commercial property markets trends. Drivers such as macro-economic and market cycles, changes in Government fiscal policy and external events (e.g. Brexit) represent exogenous factors that may influence property values to varying degrees”⁴⁹. Whilst the Council recognises this, we are concerned that GAL proposes excluding the effect of the Project on property value within the Project site given that this boundary doesn’t correlate to the current site area and includes land outside of GAL’s current ownership.

11.12. The Council also notes that GAL proposes excluding the effect of the Project on property values on residential and commercial properties outside of the Project site boundary given that no changes in flight paths are proposed and therefore the potential for effects to arise is limited⁵⁰. Given our previous comments on airspace modernisation in this response we do not consider that this justification is a sufficient reason for excluding the effect of the Project on property values.

Guidance Documents

11.13. The Council notes that Paragraph 7.10.2 of the EIA Scoping Report states that the Employment Densities Guide 3rd Edition (HCA, 2015) will be used to inform the assessment of socio-economic effects. We consider that there is also a need to take

⁴⁸ See Section 4 of the Planning Inspectorate’s Scoping Opinion: Proposed Expansion of Heathrow Airport (Third Runway) <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020003/TR020003-000451-HTHR%20-%20Scoping%20Opinion.pdf>

⁴⁹ Paragraph 7.10.24 EIA Scoping Report

⁵⁰ Paragraph 7.10.24 EIA Scoping Report

into consideration local evidence, for example densities on current employment sites within existing employment areas surrounding the airport – to inform the DMP we assessed the local circumstances and compared this to published research (including the HCA guidance) and identified more appropriate local employment densities⁵¹. The economic evidence was considered ‘sound’ by the independent Planning Inspector and should be given due regard in any assessments.

Baseline information

11.14. The Council notes that Paragraph 7.10.9 of the EIA Scoping Report provides great detail on the existing locations of workers commuting to Gatwick Airport. We consider that the existing baseline information should be split by quality of job/ sector of employment as we think that this would be useful in helping us understand the potential impact of the Project on population/ housing.

11.15. We also consider that the baseline information should take into consideration local authority monitoring data (for example, the Council’s bi-annual industrial estate monitoring information which provides information on current occupiers, uses, floorspace and planned developments).

11.16. With regards to assumptions regarding cargo throughput in the baseline information, we consider that only current cargo levels should feed into the baseline information and not anticipated cargo associated with growth under the existing configuration of the airport unless there is firm commitment from suppliers/ operators to deliver this cargo throughput.

Scope of the baseline studies

11.17. We note that Paragraph 7.10.12 of the EIA Scoping Report states that “the future baseline component of the study would draw on published projections and forecasts to consider future changes in population, employment and labour market characteristics”. Given that Figure 7.10.3 and Paragraph 7.10.9 of the EIA Scoping Report identify that the largest flows of workers commuting to the airport originate from the Crawley and Horley urban areas and given that Crawley and Reigate & Banstead Borough Councils have recently adopted local plans which are unable to

⁵¹ Reigate & Banstead Borough Council Local Economic Needs Assessment Update (June, 2016)
http://www.reigate-banstead.gov.uk/downloads/file/3978/local_economic_needs_assessment

meet their objectively assessed housing needs, we consider that there is a need to also take into consideration dwelling constrained housing and economic forecasts.

Scope of the assessment

11.18. The Council considers that there is a need for a wider consideration of the impacts of the Project upon the viability and deliverability of planned (including allocated) employment sites within the scope of the assessment. We note for example, if the delivery of the allocated Horley Strategic Employment site were impacted by the delivery of the Project then this would impact upon the provision of an estimated 4,473 annual construction jobs (20 year construction programme) and 11,985 FTE operational jobs⁵² which would seriously influence the net economic benefit/economic effect of the Project.

11.19. We also consider that there is a need to take into consideration the potential for business displacement due to the Project (for example due to increased transport impacts, cost of employment premises due to increased competition, competition for workforce etc.). We note for example that a recent business survey undertaken by the Council found that over two-thirds of businesses that responded to the survey from across Reigate & Banstead borough did not feel that proximity to Gatwick Airport benefited their business⁵³ and that recent engagement with commercial agents suggested that businesses looking to relocate to the Gatwick Diamond are not necessarily looking to do so due to the presence of Gatwick Airport but rather due to the proximity to London and the buoyant market across the South East⁵⁴.

11.20. We also consider that the scope of the assessment should include indirect and induced effects of the Project (including the effects of proposed cargo throughput). In line with the Planning Inspectorate's comments to the Luton Airport proposed growth⁵⁵, we consider that detail should be provided within the ES with regards to the multipliers used to assess the indirect and induced effects.

⁵² Indicative quantities. See Reigate & Banstead Borough Council HOR9 Strategic Employment Site: Economic Assessment Task 2: Economic and Market Impact Analysis

http://www.reigate-banstead.gov.uk/downloads/file/3945/reigate_and_banstead_sesa_-_task_2_report_fc200917

⁵³ The findings from this survey are being used to feed into an emerging piece of work but can be provided.

⁵⁴ Detailed within Reigate & Banstead Borough Council HOR9 Strategic Employment Site: Economic Assessment Task 1: Supply and Demand Evidence

http://www.reigate-banstead.gov.uk/downloads/file/3947/reigate_and_banstead_sesa_-_task_1_report_fc200917

⁵⁵ Section 4.6

Study area

- 11.21. The Council considers that there is insufficient justification for the extent of the local study area as proposed in the Scoping. We note that the local study area proposed is different to the study area used for the Airports Commission work and question why a different study area is being proposed/ different method being proposed to identify an appropriate study area.
- 11.22. From a Reigate & Banstead perspective, we consider that the scope of the study area should be expanded to include, as a minimum, Redhill and Reigate which are residential neighbourhoods (and commercial/employment locations) with direct transport links to Gatwick Airport and clear commuting relationships with Gatwick as demonstrated by travel to work area analysis in Figure 7.10.3 of the EIA Scoping Report.

Mitigation

- 11.23. The Council notes that Paragraph 7.10.21 states that “mitigation and enhancement measures will be reviewed during the ongoing assessment”. We think that this should be extended to include ongoing review of mitigation and enhancement measures throughout the operation and construction phases.
- 11.24. We note that Paragraph 7.10.22 of the EIA Scoping Report states that “measures for mitigating and enhancing potentially significant adverse and beneficial effects could include ... measures to invest in supporting the viability of community assets during the construction and operational phases through mechanisms such as planning contributions and the Gatwick Airport Community Trust; commitments to provide a certain number of apprenticeships and training opportunities for local residents during the construction phase; and confirming compensation measures for businesses and residents adversely affected by the Project”. We note that a number of these measures are already used to mitigate the impacts of the airport and stress the need for additionality in order for local residents to feel a benefit from the Project. We would also welcome specificity in the ES with regards to for example the multipliers that will be used to provide apprenticeship opportunities.

11.25. In line with Heathrow's proposed approach, we also consider that the scope of the mitigation proposed should be informed by engagement with local residents, planning authorities, businesses, education providers, skills and training bodies etc.

12. Health and wellbeing

Policies and legislative requirements

12.1. Following the adoption of the DMP, references to the "emerging Reigate & Banstead Borough Development Management Plan 2018-2027" should be amended to "Reigate and Banstead Development Management Plan (Reigate and Banstead Borough Council, 2019)" to ensure consistency with other adopted Local Plan documents.

12.2. Also following the adoption of the DMP, references to the saved Borough Local Plan policies need to be removed from the policies and legislative requirements section.

Issues proposed to be scoped out of the assessment

12.3. The Council notes that GAL is proposing to scope out the health effects arising from population change (and consequent demand for health services) during the operational phase of the Project. For the reasons given in the socio-economics section of this response, we consider that there will be a population increase during the operational phase of the Project and therefore do not consider that the health effects arising from population change should be scoped out of the assessment.

12.4. We also note that GAL is proposing to scope out the potential health impact from temporary lighting during construction as it presents limited opportunity for community exposure and would be insufficient to quantify any measurable risk to public health⁵⁶. The Council would welcome further clarity regarding this assertion particularly given that the scale and location of works proposed are unknown at this time, it is unknown whether a Construction Logistics Consolidation Centre is required at this time and the precise location and number of construction compounds is unknown at this time.

Baseline information

⁵⁶ Paragraph 7.11.57 EIA Scoping Report

- 12.5. With regards to the proposed scope of the assessment and baseline information collected to date, it is noted that a local study area has been defined as the local authorities that lay within the immediate vicinity of the Project site namely the boroughs of Reigate & Banstead and Crawley. In Paragraph 7.11.8 of the EIA Scoping Report it states that Reigate & Banstead falls within the East Surrey Clinical Commissioning Group (CCG). This is factually incorrect as three CCGs operate in Reigate & Banstead: East Surrey CCG, Surrey Downs CCG and Crawley CCG.

Scope of the assessment

- 12.6. In terms of the impact of the health impact during construction, the Council would welcome clarity as to whether the scope of the assessment will include mental health considerations of construction workers given the proposed twelve year construction period and following recent publicity on the poor mental health of construction workers at Hinkley Point which was granted via DCO.
- 12.7. With regards to the health impact assessment for the operational phase, the Council notes that Paragraph 7.11.47 of the EIA Scoping Report states that “the health impact assessment will draw from, and build upon, air quality dispersion modelling outputs to investigate and quantitatively assess potential changes in exposure and local population health outcomes for each of the modelled scenarios” and “where possible, the health assessment will quantitatively assess changes in noise exposure for a range of potential health outcomes, including annoyance, hypertension, sleep disturbance and academic performance in schools”. The Council however considers that the scope of the assessment should take into consideration proposed early growth at Heathrow and airspace modernisation changes.
- 12.8. Also, with regards to the health impact assessment for the operational phase, the Council notes that at Paragraph 7.11.29 GAL propose that the health impact assessment will take into consideration “the potential health consequence from changes in local transport composition and flow rate (potentially impacting upon capacity, safety and connectivity)” and at Paragraph 7.11.16 state that “the approach to identifying future baseline conditions will be consistent with the demographic assumptions applied across topics”. The Council would welcome clarity as to whether the scope of the assessment will also take into consideration proposed employment and therefore worker/ commuter growth.

13. Agricultural land use and recreation

Issues proposed to be scoped out of the assessment

- 13.1. The Council notes that GAL is not proposing to scope out any issues pertinent to the agricultural land use assessment and with regards to the recreational assessment are only proposing to scope out the effects on common land and allotments as there are no such resources within the study area or proximate to it that are likely to be affected by the Project.
- 13.2. From a Reigate & Banstead Borough Council perspective, we are satisfied that the scoping out of these issues would not impact upon agricultural land use or recreation facilities within the borough.

Key legislative and policy documents

- 13.3. With regards to the key legislative and policy documents listed in Paragraph 7.12.1 of the EIA Scoping Report, Core Strategy Policy CS12 “Infrastructure Delivery” which relates to recreational facilities – including loss of – and green infrastructure should be added to the list of policies.
- 13.4. References Borough Local Plan policies CO2 “Agricultural Considerations” and Hr36 “The Rural Surrounds of Horley” should be removed from this section following the adoption of the DMP.
- 13.5. References to the “emerging Reigate & Banstead Borough Development Management Plan 2018-2027” should be amended to “Reigate and Banstead Development Management Plan (Reigate and Banstead Borough Council, 2019)” following the adoption of the DMP to ensure consistency with other adopted Local Plan documents.

Baseline information

- 13.6. The Council notes that Paragraph 7.12.6 of the EIA Scoping Report states that “site visits have been undertaken in March and May 2019 but no survey work in relation to either agricultural land or recreational resources has been undertaken to date” and that “user surveys of recreational resources are planned and will be undertaken during 2019”. We consider that there is a need for further clarity regarding the potential scope of user surveys to ensure a robust baseline and consider that in order

to fully understand different users perspectives that user surveys should be conducted during both peak and shoulder periods.

- 13.7. The Council notes that Paragraphs 7.12.28-7.12.31 of the EIA Scoping Report which details baseline conditions specifically provides very detailed comments on the Riverside Garden Park in Horley. Whilst we welcome that this public open space has been clearly and specifically identified, we note that it is included within the Project site boundary and would welcome clarity at this stage for the rationale for inclusion of the Riverside Garden Park within the Project site boundary and scope of works/ mitigation interventions proposed for this area of public open space. Should the area be required for transport improvements, we would welcome clarity/ evidence as to the requirement for the full area to enable transport improvements for the routine use of the northern runway.
- 13.8. The Council questions why Table 7.12.2 of the EIA Scoping Report which details the baseline agricultural statistics for land use groups 'Crawley and Mid Sussex' and 'Reigate & Banstead and Epsom & Ewell' whilst Mid Sussex, Horsham, Mole Valley and Tandridge are detailed separately. As stated in Paragraph 7.12.18 of the EIA Scoping Report, DEFRA produce statistical records on a local authority basis.
- 13.9. With regards to the scope of baseline studies, we note that Paragraph 7.12.33 of the EIA Scoping Report states that site surveys will be undertaken to provide an understanding of the current use of recreational resources including public open space around the airport. The Council would welcome clarity that the scope of these assessments will include time periods in both the peak and shoulder periods.
- 13.10. With regards to the proposed approach to identifying future baseline conditions, we note that Paragraph 7.12.35 of the EIA Scoping Report states that "the recreational baseline conditions are not anticipated to change significantly in the future although these will be reviewed in the light of any changes that come forward in relation to local planning policy, changes to the definitive map of public rights of way, recreational initiatives affecting public open space and recreational routes, and future developments and initiatives at Gatwick Airport". We note that as part of our recently adopted DMP, site allocation policy HOR9 "Horley Strategic Business Park" which adjoins the proposed Project site boundary to the north includes at least 5ha of new high quality public open space, including parkland and outdoor sports facilities. We therefore consider that this needs to be taken into consideration in assessments.

Potential effects to be considered

- 13.11. The Council questions why Table 7.12.3 of the EIA Scoping Report which details the potential effects to be considered omits consideration of the adverse impacts on the nature and character of recreational resources from increased disturbance from roads, upgraded junctions and activity.

14. Waste

Issues proposed to be scoped out of the assessment

- 14.1. The Council notes that GAL is proposing to screen out waste arising from the extraction, processing and manufacture of the construction materials and components as detailed design information on specific construction materials will not be available within the timeframe of the EIA process. GAL however notes in Paragraph 7.13.15 of the EIA scoping opinion request that the specification and procurement of construction materials will follow the principles within the Sustainability Strategy and will take into account the relevant requirements of BREEAM.
- 14.2. Reigate & Banstead Borough Council are not a waste planning authority and therefore we do not have any detailed comments of this section of the EIA Scoping Report. Instead we would support comments provided from Surrey County Council – the waste planning authority which covers our borough.

Policy and legislative context

- 14.3. We note that the list of legislative and policy context provided in Paragraph 7.13.1 of the EIA Scoping Report needs to include the Surrey Waste Plan 2008 and the emerging Surrey Waste Plan which is due to be adopted later in 2019⁵⁷.

15. Major accidents and disasters

Issues proposed to be scoped out of the assessment

- 15.1. The Council notes that a number of elements are proposed to be screened out of the assessment of major accidents and disasters during the construction and/or

⁵⁷ Available at:

<https://www.surreycc.gov.uk/land-planning-and-development/minerals-and-waste/waste-plan>

operation phases. The Council does not have any in-house expertise with regards to major accidents and disasters and therefore we do not have any detailed comments.

Proposed study area

- 15.2. With regards to the proposed study area, we note that the proposed study area includes a distance of 10km from the Project site for ground-based events and receptors and 1km of the Project site for all other environmental receptor groups. We would welcome clarity as to the justification for the appropriateness of the distances selected.

Assessment of effects

- 15.3. The Council notes that Paragraph 7.14.21 of the EIA Scoping Report states that the assessment of effects will take into consideration potential events during both construction (and demolition) and operational phases of the Project. In order for this assessment to be effective, we consider that there is a need for more detail to be provided with regards to the nature of specific development, the location of the specific future development, what demolition works are proposed, where construction compounds will be located etc.

16. Cumulative effects and inter-relationships

16. 1. The Council welcomes consideration of the cumulative effects and inter-relationships of development as a result of the proposed routine use of the northern runway in the scope of the EIA and notes that Paragraph 4.15 of the Airports NPS states that “the Examining Authority should consider how significant cumulative effects, and the interrelationship between effects, might as a whole affect the environment, even though they may be acceptable when considered on an individual basis or with mitigation measures in place”.

Zone of influence

16. 2. With regards to the zone of influence for cumulative assessment, the Council notes that GAL is proposing to assess the affected road network using the SERTM (highway) model. The Council notes that GAL is proposing to use this model to assess the traffic impacts on the strategic highways⁵⁸ but for the local highways GAL is proposing to assess the affected road network using three VISSIM traffic

⁵⁸ Paragraph 7.6.33 EIA Scoping Report

simulation models and the Corridor model. Given that a number of the key transport routes to the airport via local roads pass through the borough, and given that the Council's recently adopted DMP includes a number of site allocations for residential and employment uses which will impact local roads, the Council considers that the scope for assessing the zone of influence for cumulative effects and inter-relationships should take into consideration local roads (for example the A217, A23, B2036 and A264/A22 given that these are key local transport routes and key transport routes to the airport).

16. 3. Taking into consideration our earlier comments regarding socio-economic effects, we also consider that the scope of the assessment of the zone of influence for cumulative assessment should take into consideration both housing and employment socio-economic effects.

Proposed methodology

16. 4. The Council notes that at Paragraph 7.15.14 of the EIA Scoping Report GAL proposes excluding "minor household applications and business applications (such as extensions or changes of use)". The Council would welcome clarity regarding the definition of 'minor' as during a recent transport data collection for the DCO residential applications and allocations less than 100 units were excluded. As stated in the Traffic and Transport section of this response, these permissions make up a significant proportion of the permissions within our borough and a number of our site allocations in the DMP fall below this threshold.
16. 5. The Council notes that GAL is proposing to periodically update the list of development sites during the EIA process⁵⁹ and welcomes this approach.

17. Transboundary effects

- 17.1. We note that GAL has undertaken a transboundary screening exercise and that as a result of this exercise it has been identified that no significant effects on other European Economic Area States have been identified and therefore that a transboundary assessment has been scoped out of the EIA process.
- 17.2. We also note that at Paragraph 7.3.2 of the EIA Scoping Report that it states that GAL is proposing to consider the potential for air quality effects on European

⁵⁹ Paragraph 7.15.18 EIA Scoping Report

designated sites (and any migratory species they may support) throughout the assessment process to ensure that significant effects do not occur and that effects on climate change will be reported in the ES⁶⁰. We support this approach.

18. Topics proposed to be scoped out of the EIA process

18. 1. The Council notes that GAL is proposing to scope out the following:

- Material assets;
- Radiation and heat;
- Daylight, sunlight and microclimate;
- Decommissioning effects; and
- Airspace change process

Airspace change process

18. 2. As stated previously within our response, the Council has a number of concerns with the proposed screening out of the airspace change process. Without consideration of the airspace modernisation programme, we consider that it is difficult to fully understand the potential health, noise and overflight impacts and therefore ensure appropriate mitigation.

Daylight, sunlight and microclimate impact

18. 3. The Council notes that in the justification for excluding the impact on daylight, sunlight and microclimate, GAL state that “due to the location of the proposed works and the nature of the surrounding infrastructure and land use it is not considered likely that the Project would have significant effects in relation to daylight and sunlight”⁶¹. The Council would question what assumptions have been made regarding building heights and layout on the Horley Strategic Employment site which is an allocation to the north of the proposed Project boundary.

19. Other comments

19.1. We stress the need for Council involvement in the Co-ordination/ Steering Group given that the subsequent DCO application will include land within Reigate & Banstead as well as Crawley.

⁶⁰ Appendix 7.16.1

⁶¹ Paragraph 8.5.1 EIA Scoping Report

- 19.2. We also stress the importance for consultation with local residents. Given the longstanding relationships and working arrangements between the airport and local community groups, and GAL's commitment to community engagement we would expect to see opportunities for local communities to be involved in the DCO process over and above statutory requirements, for example, topic working groups with established community groups, resident associations and democratically elected parish and town councils.
- 19.3. We would also expect to see proper assessment of the alternatives. We note that PINS Advice Note 7 *Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping* requires scoping reports to include "an outline of the reasonable alternatives considered and the reasons for selecting the preferred option" and we note that the only alternatives considered in the EIA Scoping Report include those outlined in the masterplan. No consideration is (for example) given to no growth at Gatwick.
- 19.4. In addition to comments made previously within this response regarding the allocated Horley Strategic Business Park, we note that the southern part of the site (which includes the access to the site from the strategic road network which is required in the policy allocation) is included within the proposed Project site. We note that as part of the DCO process GAL can compulsory purchase land. Such compulsory purchase could either 'ransom strip' the business park or lead to it being an undeliverable allocation which would severely impact upon the local economy. Given that it seeks to deliver 4,473 annual construction jobs (20 year construction programme) and 11,985 FTE operational jobs⁶² and supports the ability of local authorities to meet their employment needs (the business park will accommodate Reigate & Banstead and Crawley's strategic office need), we would therefore welcome clarity and ongoing dialogue with GAL regarding access to the site, GAL's need/ proposed uses for the site and timeframes for use of the site etc. Any detrimental impact of the Project on the delivery of the Strategic Business Park (e.g. delay to timing of delivery or adverse impact on the potential job generation from the site) should, in our view, be factored into economic assessments.

⁶² Indicative quantities. See Reigate & Banstead Borough Council HOR9 Strategic Employment Site: Economic Assessment Task 2: Economic and Market Impact Analysis

http://www.reigate-banstead.gov.uk/downloads/file/3945/reigate_and_banstead_sesa_-_task_2_report_fc200917

08 October 2019

gatwickairport@planninginspectorate.gov.uk

Our Ref: SDNP/19/04350/ADJAUT
Contact Officer: Sarah Nelson
Tel No: 01730 819285

Dear Mr Kent

Subject: TR020005 Gatwick Airport Northern Runway - EIA Scoping Notification and Consultation

Thank you for consulting the South Downs National Park Authority (SDNPA) on the scope of the EIA. Having reviewed the documentation we have the following comments to make:

Landscape, Townscape and Visual Resources

Para 7.2.1 of the Scoping Report (Main Text) sets out the legislative and policy context. Reference is already made to the South Downs Partnership Management Plan, but this should be expanded to include the South Downs Local Plan: 2019.

Our main area of interest will be the proposed study of overflying aircraft at heights of up to 7,000ft. Not only should the study assess the impact on tranquility and visual receptors during daylight hours, but it should also be extended to include nighttime. The South Downs National Park is designated an International Dark Skies Reserve. Further information can be found at <https://www.southdowns.gov.uk/enjoy/dark-night-skies/>. We would wish to understand what the impact of increased numbers of flights, if these were to occur during hours of darkness, might be on this designation.

Ecology & Nature Conservation

The SDNPA concurs with the identification of The Mens SAC and Ebernoe Common SAC within the scope of the study. Both of these locations sit within the South Downs National Park.

Socio-Economic

Paragraph 7.10.9 of the Scoping Report (Main Text) lists the Local Planning Authorities which fall within the scope of this part of the assessment. This list should include the SDNPA which covers parts of Horsham, Chichester, Mid Sussex, Adur, Worthing, Arun and Lewes as well as areas outside of the scope of the assessment in Hampshire and East Sussex. The SDNPA is the Local Planning Authority for the areas it covers.

Both you and the applicants are welcome to contact us if you wish to discuss our comments further.

Yours sincerely

S Nelson

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Our Ref: EIA Case 019-033



Mr Richard Kent
The Planning Inspectorate
Major Casework Directorate
Temple Quay House
2 The Square
Bristol BS1 6PN

1 October 2019

Dear Mr Kent,

Response to Consultation under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (as amended)

Application by Gatwick Airport Limited for an Order Granting Development Consent for the Northern Runway

PINS Reference: TR020005-000008

1. We write in response to your letter dated 3 September 2018, seeking the views of Surrey County Council on the information to be included in the Environmental Statement (ES) that will be submitted by Gatwick Airport Limited (GAL) as part of the application for a Development Consent Order (DCO) for the proposed changes to the northern runway and associated supporting development. The County Council has reviewed the information presented in the prospective applicant's environmental scoping report, and has a number of recommendations to make in respect of the proposed scope of the Environmental Impact Assessment (EIA) for the scheme.
2. The County Council has focussed its comments on those topics which impact most directly on its areas of regulatory responsibility in respect of:
 - Management of the highways network – covered by section 7.6 in Chapter 7 of Volume 1 of the Scoping Report;
 - Management of flood risk from surface waters and groundwaters – covered in section 7.5 of Chapter 7 of Volume 1 of the Scoping Report; and
 - Planning for the supply of minerals and for the management of waste – covered by sections 7.4 and 7.13 in Chapter 7 of Volume 1 of the Scoping Report.

3. The County Council has also reviewed and made comments in respect of those other topics covered by the Scoping Report in which it has particular expertise (e.g. ecology, archaeology and heritage), or for which it has particular concerns (e.g. health, air quality, noise).
4. **Planning Policy Context**: Paragraph 2.2.10 (p.8) and Table 2.2.1 (p.8) of the Scoping Report (Volume 1) identify key components of local planning policy relevant to the proposed development. The County Council is concerned that the Scoping Report does not appear to take account of its role as County Planning Authority for the whole of Surrey, nor that of West Sussex County Council in respect of the county of West Sussex. Whilst the inclusion of the Surrey Local Transport Plan as part of the local planning policy context outlined in Table 2.2.1 is welcomed, the omission of the Surrey Minerals Plan, the Surrey Waste Plan, and the Joint Aggregates Recycling Development Plan Document (DPD) is a matter of concern. Reference should also be made to the emerging Surrey Waste Local Plan, which whilst not yet adopted is progressing through the later stages of the plan making process. We would recommend that Table 2.2.1 be updated to include reference to the adopted and emerging statutory land use plans of both West Sussex County Council and Surrey County Council.
5. **Traffic & Transport**: The County Council is broadly content with the proposed scope of the assessment as set out in section 7.6 (pp.109-123) of the Scoping Report (Volume 1), in terms of the matters to be covered and those to be excluded, with the approach to baseline data collection, and with the approach to the assessment of construction and operational phase impacts on the highways network, on traffic levels and on other modes of transport. The County Council has the following specific comments to make in respect of the proposal and the assessment.
 - 5.1 Comments relating to the description of the development:
 - **Southern terminal roundabout (paragraphs 5.2.46 to 5.2.48, p.37)**: The County Council welcomes the recognition of the need for any improvement scheme for the roundabout to take account of the business park that is proposed for development on the land to the north of the junction (identified under Policy HOR09 of the Reigate & Banstead Local Plan, 2019). The assessment should take account of the traffic that would be expected to arise from that Reigate & Banstead Local Plan designation, and from extant urban extensions to the settlement of Horley.
 - **Construction Logistics Consolidation Centre (paragraphs 5.3.14 to 5.3.16, p.44)**: The County Council notes that a decision has yet to be made in respect of the provision of a construction logistics consolidation centre as part of the development, but wishes to highlight the potential for such a facility to affect traffic on the network around the airport. The location of the potential centre will determine whether there will be a net decrease in total traffic movements at the site access points. A key determinant will be whether it has an internal access to the airfield and main construction locations within the campus which thus avoids secondary journeys on the local road networks around the airfield.

The assessment should adopt a worst case approach, and modelling of traffic impacts should include the likely effects of a construction logistics consolidation centre, and of all the construction staff required to deliver the project.

5.2 Comments relating to the proposed assessment:

- Strategic Highways Modelling (paragraphs 7.6.33 to 7.6.34, p.116): The County Council recommends the use of its model for the county of Surrey as an input to the proposed strategic highways model, alongside input from the West Sussex and Transport for London models.
- Local Highways Modelling (paragraphs 7.6.35 to 7.6.38, p.116): The County Council is concerned that the extent of the model into Surrey is too limited. The County Council would recommend that the local highways model be extended to take account of the A217, A23, B2036 and A264/A22.

6. **'Water Environment'**: The County Council is broadly content with the proposed scope of the assessment, as set out in section 7.5 (pp.88-109) of the Scoping Report (Volume 1), in terms of the approach to baseline data collection, and with the approach to the assessment of construction and operational phase impacts on the water environment and flood risk. The County Council has no specific comments to make in respect of the proposed scope of the assessment of impacts on the risks of flooding associated with surface waters and with groundwaters.

7. **'Geology & Ground Conditions' & 'Cumulative Effects & Inter-relationships'**: The County Council would recommend, in the interests of completeness, that the adopted Surrey Minerals Plan (2011) be included in the list of relevant planning policy documents listed at paragraph 7.4.1 (pp.81-82) of section 7.4 'Geology & Ground Conditions' (pp.81-88) of the Scoping Report (Volume 1). The CPA would expect to see that Plan, and the sites that have been allocated for future minerals development under policies in that Plan, reflected in the review of development plans set out in Appendix 7.15.1 to section 7.15 'Cumulative Effects' (pp.) of the Scoping Report (Volume 1). There are recently permitted minerals developments (which qualify as 'major development') and allocated minerals sites that fall within the 8 kilometre buffer used to identify cumulative development and should be included in the lists set out in Appendix 7.15.1 to the Scoping Report.

- **Horse Hill Well Site, Horse Hill, Hookwood, Horley** – Planning permission (RE18/02667/CON) was granted on 27 September 2019 for the extension of the existing well site, the retention of the two existing wells, the drilling of a further four hydrocarbon wells and a water reinjection well, and the production of hydrocarbons over a period of 25 years. At present the well site is listed in Appendix 7.15.1 to the Scoping Report as entry number 80, which refers incorrectly to Mole Valley District Council as the planning authority and to an earlier permission (dating from 2016) for temporary hydrocarbon appraisal and extended well testing – the entry should be listed under Surrey County Council and updated to refer to the most recently granted permission.

- **South Holmwood Brickworks, Newdigate** – The site is an operational brickworks and clay quarry (safeguarded under Policy MC6 of the adopted Surrey Minerals Plan (2011)), with an area of search identified under Policy MC9 of the adopted Surrey Minerals Plan (2011).
 - **Clockhouse Brickworks, Capel** – The site is a mothballed brickworks and clay quarry (safeguarded under Policy MC6 of the adopted Surrey Minerals Plan (2011)), with an area of search identified under Policy MC9 of the adopted Surrey Minerals Plan (2011).
 - **Days Rail Aggregate Depot, Salfords** – The site is safeguarded as a rail aggregate depot under policy MC16 of the adopted Surrey Minerals Plan (2011), and is allocated for development as a temporary aggregate recycling facility under Policy AR2 of the adopted Aggregates Recycling Joint Development Plan Document (2013) for Surrey.
8. **‘Waste’ & ‘Cumulative Effects & Inter-relationships’**: The County Council would recommend, in the interests of completeness, that the adopted Surrey Waste Plan (2008/09) and the emerging Surrey Waste Local Plan (currently subject to modifications post-Examination in Public) be included in the list of relevant planning policy documents listed at paragraph 7.13.1 (p.189) of section 7.13 ‘Waste’ (pp.189-191) of the Scoping Report (Volume 1). The CPA would expect to see both Plans, and the sites that have been allocated, or are proposed for allocation, for future waste development under policies in those Plans, reflected in the review of development plans set out in Appendix 3.3 to the cumulative effects assessment report. There are permitted waste developments (which qualify as ‘major development’) and allocated minerals sites that fall within the 8 kilometre buffer used to identify cumulative development.
- **Land at Earlswood Depot & Sewage Treatment Works, Woodhatch Road, Redhill** – The area of land to the west of the sewage treatment works at Earlswood is currently allocated under Policy WD2 (Recycling, Storage, Transfer, Materials Recovery, & Processing Facilities (excluding Thermal Treatment)) of the adopted Surrey Waste Plan. That allocation would not be carried forward under the emerging Surrey Waste Local Plan.
 - **Former Copyhold Works, Nutfield Road, Redhill** – The area of land to the east of the Patteson Court Landfill is currently allocated under Policy WD2 (Recycling, Storage, Transfer, Materials Recovery, & Processing Facilities (excluding Thermal Treatment)) of the adopted Surrey Waste Plan. That allocation would not be carried forward under the emerging Surrey Waste Local Plan.
9. **‘Historic Environment’**: The County Council is broadly content with the approach to the historic environment set out in section 7.1 (pp.58-65) of the Scoping Report. The appropriate legislation, policy and guidance is captured, and the West Sussex and Surrey Historic Environment Records appear to have been consulted. The data used for Surrey appears to be up-to-date, and captures the recently revised Areas of High Archaeological Potential (AHAPs). The County Council has access to the Sussex data as well, as we are the archaeological advisors to Crawley Borough Council, and that information also appears to be in order. The County Council is of the opinion that the topic chapter with technical appendices set out in paragraph 7.1.17 (p.61) and paragraphs 7.1.18 – 7.1.28 (pp.61-62) will

be appropriate. The inclusion of consideration for heritage views within this scope is welcomed.

10. The area around Gatwick Airport is rich in Prehistoric material and known occupation sites. The Sussex side of the border has produced significantly more evidence – this is likely due to the heavily urbanised and developed nature of the landscape meaning that more investigations have taken place there, rather than any indication of a dearth of occupation on the rather more rural Surrey side. It is notable that some of the Sussex archaeological areas stop at the Surrey border, whilst one of the Surrey ones stops at the edge of Sussex: the assessment will need to be mindful of the fact that these distinctions are artificial.
11. One of the proposed construction compound sites is within the Surrey border (the site to the north of Junction 9a of the M23 and A23). This site is adjacent to a Surrey AHAP and will require investigation unless it can be demonstrated that the compound will be constructed and operated in a manner which will leave sub-surface deposits undisturbed, including through the possibilities of site compaction. Provision for this appears to be set out in paragraph 7.1.31, as are the proposals for subsequent mitigation, although it is noted that no mention is made of publication within the discussion on reporting: we will almost certainly require the results of any work to be detailed in the county Archaeological Journal.
12. There is little mention of heritage assets other than archaeology, but as the proposal is largely about reconfiguration of operations within an existing airport, many of the effects on these assets (Listed Buildings, historic landscapes, etc.) will already be apparent. It will be important to keep note of the settings of these sites however, particularly with regard to probable increased noise issues.
13. Assessment of impacts to heritage assets within the urbanised areas of Horley and Crawley, and the archaeological impacts of the operation of the site following the completion of any construction works has been proposed to be scoped out. The County Council is of the opinion that the proposed approach is reasonable and have no concerns with the scoping out of those aspects from the assessment.
14. **‘Landscape, Townscape & Visual Resources’**: The County Council would recommend that the [Landscape Character Assessment for Surrey](#) (2015) be included in the list of relevant local policy documents set in paragraph 7.2.1 (pp.65-66) of section 7.2 (pp.65-72) of the Scoping Report (Volume 1). The assessments for the borough of Reigate and Banstead, and for the districts of Mole Valley and Tandridge will be relevant to the LVIA process (see below for relevant local character areas (LCAs)). The Surrey LCA provides descriptive information about the character of defined local areas, and guidance on the issues of concern for those areas. The County Council would expect that LVIA to take account of the potential impacts of the proposed development on the landscape character of those parts of the county located within the ZTV defined for the scheme. The inclusion of tranquillity within the scope of the assessment of the operational impacts of the proposed development is welcomed.

- **Local Character Area WF1: Dorking to Hookwood Low Weald Farmland** – The proposed DCO site is bounded immediately to the north west by the WF1 LCA. Further details about the LCA can be found in the Surrey Landscape Character Assessment 2015, page 86 of the report for Reigate & Banstead.
 - **Local Character Area WW8: Cranleigh to Charlwood Wooded Low Weald** - The proposed DCO site is located to the east of the LCA, from which it is separated by the WF1 LCA. Further details about the LCA can be found in the Surrey Landscape Character Assessment 2015, page 136 of the report for Mole Valley.
 - **Local Character Area WF3: Horley to Swaynesland Low Weald Farmland** – The proposed DCO site is situated to the west of the LCA, from which it is separated by the M23 motorway and intervening land. Further details about the LCA can be found in the Surrey Landscape Character Assessment 2015, page 90 of the report for Reigate & Banstead.
 - **Local Character Area RF11: Upper Mole River Floodplain** – The proposed DCO site is separated from the RF11 LCA by the A217 and A23 and a range of existing development. Further details about the LCA can be found in the Surrey Landscape Character Assessment 2015, page 86 of the report for Reigate & Banstead.
 - **Local Character Area WF2: Flanchford to Horley Low Weald Farmland** – The proposed DCO site is separated from the WF2 LCA by the settlement of Horley, with the WF2 LCA located to north of the town on the western side of the rail line. Further details about the LCA can be found in the Surrey Landscape Character Assessment 2015, page 88 of the report for Reigate & Banstead.
15. **‘Ecology & Nature Conservation’**: The County Council is broadly content with the proposed scope of the assessment in respect of biodiversity as set out in section 7.3 (pp.73-81) of the Scoping Report (Volume 1), which appears to be comprehensive. The baseline assessments appear to be relatively accurate, and can be subjected to more rigorous checking at the Preliminary Environmental Information Report (PEIR) stage of the DCO process. The methodologies and data gathering all seem to be following accepted guidance and standards, in terms of general approach and species or habitat specific studies.
16. With reference to the guidance listed under paragraph 7.3.2 (p.74) of the Scoping Report (Volume 1), given that the assessment is to include modelling of air quality effects on designated sites, the County Council would recommend that the recently published Institute of Air Quality Management (IAQM) guidance (*A Guide to the assessment of air quality impacts on designated nature conservation sites*, IAQM, June 2019) on that topic be included. The County Council would expect the assessment of air quality impacts on nature conservation assets to include Sites of Nature Conservation Importance (SNCIs), of which the following are likely to be relevant due to their proximity to the road network that services the airport. Please note the following list is indicative and the final list for inclusion in the assessment should be determined through a Biological Records Centre (Surrey Biological Information Centre) search.
- **Withy Gill SNCI** (National Grid Reference 527281 142870) – a wet grassland site that has potential as a water dropwort (*Oenanthe siliifolia*) sites, a species that is rare in Surrey.

The SNCI is located immediately to the north of a section of the A217 close to that road's junction with the A23 in Horley.

- **The Roughs SNCI** (National Grid Reference 530609 142177) – Selected for 8.5 hectares of ancient semi-natural woodland supporting at least 18 ancient woodland indicator species. Fine-leaved water-dropwort, a species shown as Locally Rare on the Surrey Rare Plant Register is present on the site. The site is located within 250 metres of the to the M23 motorway close to Junction 9 (the Gatwick Airport junction) to the east of Horley. The habitat covered by the SNCI designation is Ancient Woodland.
17. The County Council notes that no reference appears to have been made to Biodiversity Opportunity Areas (BOAs), which may be of assistance to the assessment in respect of the identification of appropriate mitigation and opportunities for net gain. The BOA most relevant to the proposed DCO application site is the [RO5 'River Mole & Tributaries'](#) BOA.
 18. **'Air Quality'**: Air quality is an area of concern for the County Council due to the potential for impacts on public health, particularly in connection with individuals already affected by coronary or pulmonary disease. The County Council would encourage the applicant to ensure that the assessment covers the effects of emissions of key pollutants from aircraft and traffic, and the consequent impact of those pollutants on air quality and human health impacts. Of particular concern for the County Council is the impact of the development on the populations of the Horley and Charlwood areas within Surrey.
 19. The County Council is broadly content with the approach to air quality assessment set out in section 7.7 (pp.124-132) of the Scoping Report, but would encourage the applicant to give consideration to issue of ultrafine particulate matter (<0.1 µm) within the assessment. Ultrafine particulate pollution from aircraft is now recognised as affecting the pulmonary health of communities residing in proximity to airports, and in particular populations located downwind up to a distance of several kilometres. Whilst it is recognised that no standards have yet been set for nanoparticles at national or international level, the implication of the proposed increase in aircraft movements for local air quality and the health of local communities should be covered by the assessment.
 20. **'Noise & Vibration'**: The County Council is broadly content with the approach proposed for the assessment of the noise and vibration impacts of the development, in terms of construction and ground based operational impacts, as set out in section 7.8 (pp.132-144) of the Scoping Report. It is noted that the DCO proposals would bring taxiing aircraft closer to the village of Charlwood, which is situated in Surrey to the west of the airport. The County Council is pleased to note that the proposed modelling would include assessment of the effects of ground noise from taxiing aircraft and the construction and use of new taxiways on local residents.
 21. The County Council is concerned that the Future Airspace Strategy Implementation review for the airspace over the south east of England (FASI-S), which is part of the national Airspace Modernisation Strategy, has been scoped out of the assessment. The proposed DCO and

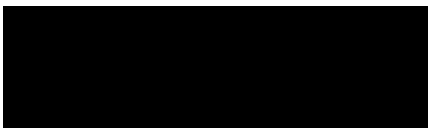
FASI-S are directly related but at present the results of FASI-S and the final flightpaths cannot be predicted.

22. FASI-S will be designed on the basis that Heathrow Runway 3 and Gatwick Runway 2 both proceed. Although the current proposal would not, of itself, require changes to existing flightpath arrangements, flightpaths are very likely to change under the FASI-S review before the northern runway is completed. Consequently the areas covered by the noise contour bands for aircraft, which will be a key part of the assessment for the DCO, could change within the lifetime of the DCO project. New flightpaths could have a significant adverse impact on the quality of life of some communities and if there are newly affected areas or areas experiencing more overflights potentially negative health impacts.
23. It is recommended that the assessment provide an indication of the level of certainty attached to the air noise impact assessments where they are based on existing flightpaths and if possible explore any indicative alternative flightpaths, perhaps on a worst case basis, so that local communities and stakeholders are able to understand and develop an informed view of the likely environmental effects. Preferred design options for Gatwick's airspace change are anticipated in late Summer/Autumn 2020 before the DCO is expected to be submitted and the assessment process should take these into account.
24. **'Climate Change & Carbon'**: The County Council is broadly content with the approach to the assessment of climatic impacts and carbon emissions set out in section 7.9 (pp.144-160) of the Scoping Report. However, the County Council would recommend that the assessment give consideration to the likely implications of the forthcoming report of the Committee on Climate Change (CCC), which is expected in the autumn. That report is expected to make recommendations for the aviation sector consistent with delivering the Government's recently legislated target for net zero carbon by 2050. Those recommendations are expected to be taken into account in the Government's final Aviation Strategy for 2050, and is therefore a key issue for the proposed development at Gatwick that should be factored into the assessment.
25. **'Health & Wellbeing'**: The County Council is broadly content with the approach to air quality assessment set out in section 7.11 (pp.169-179) of the Scoping Report. The County Council would recommend that the assessment make use of the World Health Organisation definition of health, *'a state in which every individual realises his or her own potential, can cope with the normal stresses of life, can work productively and fruitfully, and is able to make a contribution to her or his community,'* and make reference to the wider determinants of health model developed from that by Dahlgren and Whitehead (1991) in their assessment of the health and wellbeing impacts. The County Council would recommend that reference be made in paragraph 7.11.1 (p.169) to the Health and Wellbeing Board Strategies for Surrey.
26. Paragraph 7.11.12 (p.172) states that, *'.....communities surrounding the Project site are not considered disproportionately sensitive to changes in environmental health determinants.'* However, the baseline public health indicators used at district/borough level or Clinical Commissioning Group (CCG) can conceal health inequalities. Therefore the EIA needs to

consider vulnerable groups who might be disproportionately affected, for example those from more deprived communities. The index of multiple deprivation (IMD) can help identify these communities. Other vulnerable groups who may be disproportionately affected include older people, young people and children, people with existing poor health and/or disabilities and their carers', and the assessment should take account of this.

27. The County Council welcomes the references made within the Scoping Report to the Joint Strategy Needs Assessment (JSNA). It is suggested that the baseline data could include Potential Years of Life Lost (PYLL), a summary measure of premature deaths (i.e. deaths in those under the age of 75) due to causes which have been identified as amenable to prevention or delay through good healthcare. In East Surrey, the largest cause of PYLL is respiratory diseases and this could be impacted by any potential change in air quality.
28. The County Council would also suggest that consideration be given to the inclusion of positive health impacts within the scope of the assessment, as the development may present opportunities to promote good health and wellbeing. For example, by promoting and maximising active travel opportunities in the transport proposals.
29. We hope that the above comments are of value to the process of defining the scope of the EIA for the proposed scheme, and would welcome the opportunity to engage further with the applicant as the development of the scheme and the associated assessment progresses. Should you require any further information, or wish to seek clarification of any of the comments that we have made please do not hesitate to contact us (Dr Jessica Salder, Principal Environmental Assessment Officer, jessica.salder@surreycc.gov.uk).

Yours sincerely



Caroline Smith
Interim Planning Group Manager

Gatwick Airport Ltd
c/o Mr Richard Kent
Major Casework
Directorate
Temple Quay House
2 The Square
Bristol

If calling please ask for:
Charlotte Parker on 01883 732866

E-mail: cparker@tandridge.gov.uk

Our ref:

Your ref: TR020005-000008

Date: 30 September 2019

Dear Sir

PINS reference: TR020005-000008

**Planning Act 2008 (as amended) and The Infrastructure Planning
(Environmental Impact Assessment) Regulations 2017 – Regulations 10 and
11:**

**Application by Gatwick Airport Limited for an Order granting Development
Consent for the Gatwick Airport North Runway**

I write in response to your letter dated 3rd September 2019 which sought the views of Tandridge District Council (TDC) on the information to be included in the Environmental Statement (ES) to be submitted by Gatwick Airport Ltd as part of its application for a Development Consent Order (DCO) for the northern runway. Tandridge District Council is a 'host authority' in relation to this development, by virtue of land at J9 of the M23 and within the Project area falling within the District.

The information submitted in the Environmental Impact Assessment Scoping Report (EIASR) (September 2019) has been reviewed. Comments on the proposed scope of the ES are set out below, focusing mainly on the overarching issues around baseline assumptions and the scope of the Project, and the individual topics which impact directly on the District. Where technical expertise exists within other authorities (such as Surrey County Council and West Sussex County Council for transport related impacts, waste), this is deferred to for these issues, and referred to accordingly in the comments as set out below.

For ease of reference, comments will be made under the headings in the EIASR.

Yours faithfully



Charlotte Parker
Interim Head of Policy, Projects and Performance

Part 1 – Introduction

- 1.1 Part 1 of the EIA Scoping Report (EIASR) sets out the background to the Project, and overview of it, the consenting regime to be followed to seek consent for the scheme. It also summarises the EIA context, and the purpose of undertaking the Scoping process and publication of a Scoping Report. However, it is considered that there is insufficient clarity over the extent and scope of the proposed works. It is considered that the EIASR does not provide a comprehensive and clear description of the DCO works, the baseline data against which impact is to be assessed is considered in some areas to be unclear, and the project boundary (figures 1.2.1 and 1.3.1) appears to exclude areas of land which may be required for infrastructure improvements to support the development and mitigation to offset harm.
- 1.2 Whilst recognising that uncertainty at this early stage is inevitable, and that flexibility is required with regard to the definition of development parameters and the assessment of worst case scenario (as acknowledged by the Rochdale Envelope assessment approach), sufficient information at the EIA Scoping stage is required in order to fully understand the proposals and assess their potentially significant effects.
- 1.3 PINS Advice Note 9 (Rochdale Envelope) recognises the difficulty involved in establishing a robust worst case scenario for the purposes of assessment where there is a large degree of uncertainty. However in dealing with uncertainty applicants are required to ensure that the likely significant environmental effects from the development have been properly assessed in the ES, and that there is a consistent approach to the description of development addressing uncertainty and necessary flexibility across all the relevant application documents. PINS Advice Note 9 also advises that the details of development should be described ‘as clearly and simply’ as possible, to enable people to understand the proposals, particularly those ‘less familiar with the PA2008 process’. In addition to providing sufficient clarity for the purposes of assessing significant effects, the ES should aim to present the areas of uncertainty as clearly as possible for both the technical and non-technical stakeholders.
- 1.4 This Council shares the concerns raised by other host and neighbouring authorities that as various aspects of the Project remain uncertain at this stage, significant effects cannot be fully identified.

Part 2 - Consenting Process

- 2.1 TDC confirms that the information set out in Table 2.2.1 is correct in respect of its current and emerging local planning policy documents.
- 2.2 In respect of paragraph 2.3.5 (Community Consultation), given the significant interest in these proposals from local communities and groups, early engagement beyond the statutory requirements of the SoCC is

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encouraged.

- 2.3 TDC is supportive of and welcomes the ongoing engagement between Gatwick Airport Limited and the other nine local authorities in the Gatwick Diamond.
- 2.4 In respect of the Proposed Engagement Structure (diagram 2.3.1), it is suggested that the statutory consultees listed in 2.3.14 (Highways England, Environment Agency, Historic England, Natural England, TFL, DoT and Network Rail) are involved directly in the Topic Working Groups and Coordination Group (as appropriate) to ensure transparency and sharing of information and expertise.

Part 3 - Need and Alternatives Considered

- 3.3 It is considered that the need for the increase in capacity being sought through this Project is more fully assessed and addressed, particularly in light of the evolving climate change agenda and the Government's commitment in relation to emissions as set out in the Climate Change Act 2008 (2050 Target Amendment) Order 2019. Such an assessment should also take account of the implications for growth/demand of the UK's departure from the EU, and capacity projections for Heathrow Runway 3.

Part 4 - Existing Site and Operation

- 4.1 Information presented in this section will be used in the formulation of baseline assumptions for the ES, and as such it is vital it is as reliable and accurate as possible. There is currently a lack of clarity around which of the projects referred to have planning permission, and therefore their deliverability (including the implications if they are not delivered). This has implications for the assumptions and modelling which will form part of the DCO (and ES), particularly in relation to car parking demand, hotel room capacity and cargo throughput, and in turn noise, air quality and traffic impacts. It is strongly recommended that GAL engage with Crawley Borough Council (as local planning authority) to agree an accurate baseline from which the ES can be progressed.

Part 5 - Project Description

- 5.1 As set out in relation to Part 1 above, it is considered that the extent of the Project is not sufficiently clear in relation to all its elements – both in relation to their location and scale. Within this section there appears to be some discrepancy between the areas identified for development on figures 5.2.1a – g, and some elements of the text in the main report. For example the same location at the North Terminal is shown as being for hotel use, a multi storey car park, and underground storage, and at the South Terminal a multi storey car park, hotel and office, without clarity over whether these indicate alternative options for the sites or multiple use. In the absence of these details it is difficult for conclusions to be reached over the potentially significant effects of the Project.
- 5.2 The proposed CARE (Central Area Recycling Enclosure) is of particular

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concern due to the potential height of its chimney (from a landscape/visual impact perspective) and its other potential environmental impacts, and more details should therefore be provided in relation to this facility.

- 5.3 It is stated that the overall net increase in car parking spaces will be approximately 17,500, and that the numbers take into account an anticipated reduction in spaces currently provided in unauthorised sites off site. Off airport parking is a particular issue for this District, with ongoing pressure for sites (often in Green Belt locations) to be used for parking primarily through 'meet and greet' arrangements. It is therefore vital that as much clarity over the location and phasing of new parking provision is provided in the ES.
- 5.4 Also noted is the uncertainty over surface access improvements to be included in the Project, particularly as the EIASR scoping boundary is tightly drawn. Potential junction improvements to the roundabouts at the North and South Terminals have been identified, but in the absence of completed transport modelling the scope of improvements to the wider highway network (including potentially within this District) any resultant impact cannot be assessed.

Part 6 - Approach to EIA

- 6.1 As set out in the EIASR, the timing of the delivery of Heathrow runway 3 will have a significant impact on the rate of passenger growth at Gatwick, and therefore the environmental impacts arising from it. The target design year/opening date for the northern runway at Gatwick is 2026, with all elements operational by 2038. The construction phase is anticipated to be 2022-2034, with an interim assessment year of 2029. The current expected date of opening for Heathrow R3 is 2026, however the Scoping Report recognises that the implications of a later date also need to be assessed (though no date is given for this). The uncertainty around the delivery of Heathrow R3 however is such that in the event that it is delayed beyond 2038, or not delivered at all, growth at Gatwick could take place at a much faster rate and capacity could be reached before the end of the assessment period to 2038. For this reason it is considered that the ES should model the non (or delayed) delivery of R3 as the 'worst case' scenario.
- 6.2 It is also considered important that the baseline conditions based on the 'do nothing' scenario/scenario 1 are clear, as the figure of 61 million passengers per annum (mppa) is referred to in the context of both 2032 (the date used in the Masterplan) and 2038. As set out in paragraph 4.1 above, this figure is also potentially affected by the delivery of projects already in the pipeline (either with or without consent), and there remains some uncertainty around which ones will be delivered and when. As the impact of the scheme cannot be accurately assessed without clarity and certainty around the baseline position, this needs to be addressed.

Part 7 - Proposed Scope of Assessment

Historic Environment

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- 7.1 No specific comments are made on the proposed scope of the baseline studies, study area, affects proposed to be assessed, and the approaches to the assessment of effects, and mitigation, enhancement and monitoring in relation to this topic. The scoping out of the potential effects on the importance of designated heritage assets in urbanised areas (Horley and Crawley) is considered acceptable in principle, though the comments made by the Boroughs within which these towns are located (Reigate and Banstead, and Crawley) are deferred to in this instance. The scoping out of effects on buried archaeology during the operational phase of the development is considered acceptable.

Landscape, Townscape and Visual Resources

- 7.2 As set out in paragraph 5.2 above, there are limited details on the proposed CARE facility (Central Area Recycling Enclosure), which could have a stack height of up to 50m (potentially the tallest feature on the site). Paragraph 7.2.4 of the EIASR refers to the height of the 'main buildings' on the site and on which the existing ZTV is based (maximum height 40m). At 5km the study area does not extend to the high points/viewpoints on the North Downs/Surrey Hills AONB but it is important that the potential impact of this facility (including any lighting affixed to it) is assessed as part of the wider landscape assessment.

Ecology and Nature Conservation

- 7.3 No specific comments are made on the proposed scope of the baseline studies, study area, affects proposed to be assessed, and the approaches to the assessment of effects, and mitigation, enhancement and monitoring in relation to this topic.

Geology and Ground Conditions

- 7.4 No specific comments are made on the proposed scope of the baseline studies, study area, affects proposed to be assessed, and the approaches to the assessment of effects, and mitigation, enhancement and monitoring in relation to this topic.

Water Environment

- 7.5 No specific comments are made on the proposed scope of the baseline studies, study area, affects proposed to be assessed, and the approaches to the assessment of effects, and mitigation, enhancement and monitoring

Traffic and Transport

- 7.6 Comments from West Sussex County Council (as local highway authority for the Project area) are endorsed. Surrey County Council, as the highway authority covering Tandridge and other host and neighbouring authority Surrey Districts, is best placed to comment in detail in relation to this topic.

Air Quality

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- 7.7 As with other areas of impact, the uncertainties around the rate of growth resulting from the Project are such that air quality impacts cannot be accurately assessed.
- 7.8 It is noted also that the EIASR does not make reference to emerging evidence in relation to ultra-fine particulate pollution resulting from airports. The potential future risk from this type of pollutant should be addressed in the ES.

Noise and Vibration

- 7.9 The detailed comments made by Crawley Borough Council under this topic heading are endorsed. Of particular significance to this District (in relation to aircraft noise) is the fact that the use of the northern runway will bring departures 210m closer to those communities on the north side of the airport, until they turn onto the relevant Standard Instrument Departure Routes within the Noise Preferential Route approximately 5-7 km beyond the end of the runway. This is likely to impact on residents and communities in the south western part of the District including Smallfield. Also of significance for this District is the likely increase in the number of 'go-arounds' (where a landing is aborted as a result of another aircraft failing to vacate the runway), which cause disturbance and anxiety due to their low altitude. This data also needs to be presented as part of the ES.
- 7.10 In terms of ground noise as a result of traffic, the impact of increased traffic on local roads needs to be fully assessed. A number of smaller roads and country lanes in this District, particularly in its south western corner, are used as alternative routes for airport related traffic (including for employees) and there is the potential for increased volumes of traffic to have a significant effect on noise levels close to residential properties.

Climate Change and Carbon

- 7.11 Paragraph 7.9.8 of the EIASR should include as key legislation the Climate Change Act 2008 (2050 Target Amendment) Order 2019. This sets out the Government's commitment in relation to carbon emission reductions by 2050 and should be central to the assessment of climate change in the ES.

Socio-Economic Effects

- 7.12 TDC does not support the scoping out of the effect of the Project on population (construction and operational phases). Increased employment at the airport is likely to result in benefits to the local area and local economy, including within this District and the wider East Surrey of which it is a part. However, with the lack of detail which currently exists over the number and type of jobs which will be created, and at which point during the assessment years they will come onstream, the potential socio-economic effects cannot be assessed. Growth at Gatwick will have an effect on both the local labour market and, of particular concern to this District, the demand for housing. As the exact nature of the jobs created

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will have a bearing on the type of housing required, as lower skilled work is likely to result in demand for housing more locally to the airport than more highly skilled jobs (where longer commutes would be expected) and affordability is a key factor, it is important that the nature of the jobs for which total figures have been provided is clarified. Any new housing which is required as a result of growth at Gatwick will also have implications for infrastructure (schools, health services, community infrastructure etc), and the effects on transport infrastructure and potential improvements required cannot be fully assessed without further details in this regard.

- 7.13 It is understood that a Housing Implications Study is being prepared by the applicant. The results of this study are key to understanding the likely effect of the development on population across the areas of the host and neighbouring authorities (and potentially further afield). This issue should be scoped in until the study's conclusions have been produced and their implications understood.
- 7.14 Paragraph 7.10.24 refers to the effect of the development on property values on residential and commercial properties outside the Project area, and concludes that as there would be no change to flight paths the potential for effects to arise in this respect is limited. However, there is the potential for properties to be newly overflowed and for the intensification of flights on existing flightpaths, which includes routes within Tandridge. It is considered therefore that the effects on property prices should be included in the assessment.

Health and Wellbeing

- 7.15 This issue relates closely to socio-economic effects, and in particular population change (see above). There is also a close relationship with noise and air quality (construction and operational phases), as addressed above.

Agricultural Land Use and Recreation

- 7.16 No specific comments are made on the proposed scope of the baseline studies, study area, affects proposed to be assessed, and the approaches to the assessment of effects, and mitigation, enhancement and monitoring in relation to this topic.

Waste

- 7.17 No specific comments are made on the proposed scope of the baseline studies, study area, affects proposed to be assessed, and the approaches to the assessment of effects, and mitigation, enhancement and monitoring in relation to this topic.

Major Accidents and Disasters

- 7.18 TDC question whether the risk of accidents and major incidents should be scoped out, given the increased level and complexity of activity at the airport which would result from this development. This is also an issue of

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particular importance for the local community, who will expect thorough evaluation of potential risks in this regard.

Cumulative Effects and Inter-relationships

- 7.19 In accordance with the EIA Regulations, the 'in combination' effect of the Project and other projects should be taken into account. Tandridge's emerging Local Plan seeks to allocate land at South Godstone for a new garden community of 4,000 homes, employment space and community facilities (Strategic Policy SGC01), and due to the proximity of the site and potential transport links (including by rail) to the airport, it is considered that this strategic development should be taken into account in the assessment.
- 7.20 The in-combination effect of Heathrow's expansion should also be taken into account.

Part 8 - Topics Proposed to be Scoped Out of the EIA Process

- 7.21 It is understood that the timing of the Future Airspace Strategy Implementation (South) (FASI-S) work currently being carried out by the National Air Traffic Services (NATS), the DfT and the CAA is such that any resulting flight path changes will not be available for the ES. However where possible there should be consistency between the two processes, with one informing the other as appropriate. The statement in paragraph 8.7.3 that if information does become available during the EIA it will be reviewed and taken into account is welcomed and supported

Gatwick Airport Northern Runway

Scoping Response

October 2019

1. Overview

- 1.1 This paper sets out the response by TfL to the scoping opinion consultation by the Planning Inspectorate for the application by Gatwick Airport Limited (GAL) for development consent to bring the Northern Runway into regular use and associated works.
- 1.2 It is noted that that nothing has been scoped out of the traffic and transport assessment for the Environmental Impact Assessment (EIA), which is entirely appropriate at this early stage. Although no issues have been de-scoped, TfL is keen to ensure that GAL continues to have sufficient regard for any potential impacts identified on London's transport networks. TfL looks forward to continuing engagement with GAL on these issues.
- 1.3 As part of the assessment of transport, GAL should have regard for relevant London policies including the Mayor's Transport Strategy (MTS). The MTS sets a target for 80% of all Greater London trips to be taken by sustainable modes, including public transport, walking and cycling. It is essential that development proposals outside Greater London but which are significant generators of trips to and from London have regard for this target and support its delivery.
- 1.4 In the case of the Gatwick Airport, Greater London is currently its largest market, representing 42% of passengers travelling through the airport. It is the mode share of both passengers and staff travelling between London and the airport which is of most relevance to TfL.
- 1.5 The MTS sets out a transport policy based on Healthy Streets, as part of a wider strategy to improve public health and support good growth. TfL Healthy Streets indicators should be used as a measure of amenity within Greater London, and TfL recommends that the Healthy Streets indicators be applied across the wider study area in order to support sustainable development.
- 1.6 GAL's analysis of the surface access dimension of its proposals is an essential part of its wider assessment of the full range of environmental impacts, which needs to explicitly draw out the impacts on London and associated mitigation required.

2. Baseline Information

- 2.1 In accordance with DfT WebTAG guidance, GAL should agree with stakeholders what surface transport infrastructure and operations will exist in the future baseline without airport expansion. GAL will test the 'with scheme' against the 'without scheme' scenario to determine what impacts will need to be mitigated against. The baseline scenario cannot include uncommitted schemes.

Baseline conditions

- 2.2 The Scoping Report highlights that 42% of Gatwick passengers travel to or from Greater London. As this is the largest market for Gatwick passengers and the demographic of greatest relevance to TfL, GAL should provide the mode share split (main mode), for passengers from Greater London in the baseline conditions. This should be given for the baseline, future baseline and with project scenarios.
- 2.3 The baseline staff mode share has not yet been made available and should be included. This is critical for assessing future staff flows and mode share.
- 2.4 As well as the Brighton Main Line (BML) that directly serves the airport, the modelling will need to assess the impact on onward routes and key interchanges in Greater London. Modelling will in general need to assess the impact on bus and coach routes.
- 2.5 Public transport connections to Gatwick for locations in southeast and southwest London – i.e. without easy access to the BML – can be relatively weak relative to private car. Any baseline modelling should seek to understand the flows between these areas on all modes.

3. Proposed Scope of Assessment

Highway modelling and study area

- 3.1 TfL is satisfied that the proposed detailed highways modelling area is appropriate for the proposed project, covering key corridors and town centres in south London. TfL is also satisfied that the strategic highway modelling area is appropriate for the project, which includes all of Greater London.
- 3.2 Should junctions, corridors or wider areas be identified in the strategic modelling as likely to be impacted by the proposed project, detailed modelling should be completed for the affected area.
- 3.3 Modelling will need to assess any direct and indirect impacts from the proposed development, including the potential for induced growth.
- 3.4 The A23 corridor, which forms part of the Transport for London Road Network (TLRN), is the corridor of most interest for TfL in relation to the proposed project, with Fiveways Junction and Purley Gyratory of particular concern. For the purposes of

modelling, the Fiveways Junction capacity upgrade should be treated as a committed scheme, while the Purley Gyratory upgrade is not committed.

Public transport modelling and study area

- 3.5 TfL is satisfied that the proposed public transport modelling arrangements are generally appropriate for this project.
- 3.6 It is noted that the proposed scope of assessment does not explicitly include tram services in South London. GAL should ensure that the trams are included in the public transport study.

Sources of data in scoping

- 3.7 TfL requests that any data obtained and used by GAL for the purposes of the EIA, the Transport Assessment (TA) and the Surface Access Strategy is made publically available.
- 3.8 TfL can advise on types of baseline condition survey needed for walking and cycling, such as Healthy Streets assessments.

Significant effects identified

- 3.9 Issues which have not been identified in Table 7.6.1 include:
- Collisions specifically between cyclists and HGVs
 - Air, light and noise pollution due to construction traffic
 - Air quality impact of construction
- 3.10 TfL would like to highlight the potential impact on Tram, Underground, Overground and other national rail services feeding into the BML. These should be adequately modelled in order to determine any potential further crowding on these services.
- 3.11 The air quality and noise impacts of traffic and transport should be assessed as part of the EIA within their respective chapters, as indicated by GAL.

Magnitude, sensitivity and significance

- 3.12 TfL recommends GAL works with it to determine the magnitude of any impacts on transport within, to and from Greater London.
- 3.13 GAL should consider luggage load factor on public transport services as luggage can have a significant impact on crowding, particularly during peak hours.

4. Mitigation of impacts

Mitigation during construction

- 4.1 GAL should make use of TfL's Construction and Logistics Plan (CLP) guidance, as it sets out how TfL expects construction to be assessed in the planning stages. TfL's CLP guidance has been used for other nationally significant infrastructure projects, such as Thames Tideway Tunnel and HS2, as best practice. GAL should forecast construction traffic, both workers and materials, for the entire build programme, and assess lane usage and track possessions during the build programme. GAL should provide modelling for all phases of construction.
- 4.2 Based on the results of the assessment, GAL should implement measures to avoid, minimise and mitigate impacts on the TLRN and the Strategic Road Network (SRN) as part of the Mayor's Vision Zero and air quality targets.

Mitigation during operation

- 4.3 GAL should seek to set out measures for encouraging mode shift from private vehicles, not only for meeting surface access targets, but for reducing air pollution, noise, carbon emissions and limiting climate change impacts.
- 4.4 GAL has separately indicated that it aims to increase rail mode share for passengers to 50% by 2040 from the present mode share of 39%. This is a sensible approach so long as this increase in rail mode share is not at the expense of other sustainable modes. GAL also needs to set out its plan for staff trips.
- 4.5 In the context of the MTS target, and recognising the already strong rail connections between Gatwick and London, TfL has called on GAL to commit to an ambitious mode share target specifically for airport passenger and staff trips to and from Greater London.
- 4.6 GAL's assessment should consider how it will meet its mode shift objectives and how the network is able to support the increase in public transport trips.
- 4.7 It is noted that GAL proposes to construct approximately 17,500 new car parking spaces to support the project. TfL recognises the spatial context of Gatwick Airport; however any proposed uplift in car parking needs to be evidence-based. Too much car parking availability risks making driving to the airport an attractive option compared to sustainable modes.
- 4.8 Based on the results of the assessment, GAL should implement measures to avoid, minimise and mitigate impacts on the TLRN and SRN as part of the Mayor's Vision Zero and air quality targets.

The Planning Inspectorate
Temple Quay House
2 The Square
Temple Quay
Bristol
BS1 6PN

Our Reference: 63025

Date: 30th September 2019

Dear Sir/Madam,

RE: TR020005 Gatwick Airport Northern Runway - EIA Scoping Notification and Consultation.

Thank you for consulting Thames Water on the above document. Thames Water are the statutory sewerage undertaker for the Crawley Borough and Gatwick Airport area and would like to make the following comments:

Thames Water would expect the application and description of the proposed development to set out the information relating to Foul Drainage & Sewage Treatment and Surface Water Drainage with detailed descriptions of the infrastructure required to serve the entire site and the programme for provision. Thames Water would also expect the Environmental Assessment to assess the environmental impacts of these aspects. Therefore, the EIA scoping report should outline the studies which will be required to examine the effects of increased waste water treatment and surface water.

Thames Water have started early dialogue with consultants representing Gatwick Airport but ahead of the outcomes of any meeting we need to ensure the EIA addresses the following in relation to both Crawley & Horley Sewage Treatment Works (STWs):

- Current capacity at the Crawley and Horley STWs
- Future requirements at the STWs for both the airport and growth planned in surrounding Local Plans
- Consents at the STWs (environmental & volumetric)
- Receiving watercourse limitation (environmental & volumetric)
- Land availability for future expansion of the STWs. There is limited land available at Crawley STW for future upgrades and the site is surrounded by airport safeguarded land so is constrained
- The Crawley Local Plan Water Cycle Study which is about to be reviewed by Crawley Council
- Network capacity – can the flows be transferred to the STWs

Thames Water are not the Water Supply undertaker for the area.

Should you have any queries please do not hesitate to contact us.

Kind Regards,

Development Planning

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monitoring
Date: 30 September 2019

Dear Sir/Madam

Waverley Borough Council Gatwick Airport North Runway – EIA Scoping Opinion

Waverley Borough Council has considered the Environmental Impacts Assessment (EIA) Scoping Report for Gatwick Airport Northern Runway development proposal. The Council's comments are as follows:

The purpose of an environmental statement is to enable the environmental impacts of a proposed development to be fully considered, alongside the anticipated economic or social benefits of the development (as detailed in the planning statement), before the application for planning consent is determined. The environmental statement provides environmental information to aid the decision making process.

In terms of presentation and content the submitted environmental statements should be laid out clearly, with minimum use of technical terms (where feasible) and should provide an objective and realistic description of the likely significant impacts of the proposed developments. The information should be presented so as to be comprehensible to the specialist and non-specialist alike. The environmental statement should be concise with supporting technical information placed in appendices.

The baseline should describe existing conditions both at the site and the surrounding area that would be affected by the proposed development. The baseline situation should be described for each aspect of the environment that would be affected with information provided about the dates of any surveys or sampling work undertaken. The baseline data reported in the environmental statement should be the most relevant and up to date, and a consistent approach to data collection and recording should be taken across all the environmental statements submitted in respect of the different components of the proposed Scheme.

For each aspect of the environment the baseline data sources relied upon should be identified, and details (including dates) should be provided of any survey or sampling work undertaken. The timing and scope of all surveys or sampling programmes should, wherever possible be agreed with the relevant planning authority, with relevant statutory bodies and/or appropriate consultees.

The EIA Regulations require the identification of the 'likely significant effects of the development on the environment' (Regulation 18(3)(b)). As a matter of principle, the relevant planning authorities employ a precautionary approach to judging 'significant effects'. In other words 'likely to affect' will be taken as meaning that there is a probability or risk that the development will have an effect, and not that a development will definitely have an effect.

The environmental statement must clearly define the meaning of 'significant' that has been applied in the context of each of the aspects of the environment that have been assessed, and the likely significant impacts of each component of the Scheme must be clearly identified. Quantitative criteria and/or standards should be used where available. This should also apply to the consideration of cumulative impacts, and impact inter-relationships. A consistent approach should be taken across all the environmental statements when defining impact significance.

Mitigation measures may fall into a range of categories namely: avoidance of impacts; reduction in the magnitude of impacts; or compensation for losses incurred through unavoidable impacts; and should be identified as such in the technical chapters of each environmental statement.

Mitigation measures should not be developed in isolation, as they may relate to more than one aspect of the environment (e.g. mitigation to address issues of landscaping, surface water management and biodiversity), and to more than one component of the Scheme. For each aspect of the environment under consideration, the environmental statement should set out the mitigation measures required to prevent, reduce and where possible offset any significant adverse effects. The environmental statement should also identify any residual effects that could be expected to persist even with mitigation in place. Any proposed mitigation should be discussed and agreed with the relevant planning authority and with relevant consultees.

The mitigation measures proposed in each technical chapter should be cross-referred to specific conditions or legal agreements that could be attached to any permission granted. It is further recommended that a section is included in each environmental statement in which the mitigation measures proposed across all the technical chapters are collated, and presented as an integrated package of mitigation.

All specialist chapters should be cross-referenced to other relevant disciplines (e.g. air quality impacts on ecology, traffic impacts on air quality, etc.). Consideration of the potential for interactions between the different aspects of the environment is essential to the production of a robust assessment. The environmental statement should not be a collection of separate specialist chapters, but a comprehensive assessment of the environmental impacts of the proposed components of the wider Scheme, and should account for how the identified impacts could be mitigated or avoided, or how suitable compensation could be provided to offset those effects.

In accordance with the requirements of paragraph 6 of Schedule 4 of the EIA Regulations, each technical chapter should include a discussion of any difficulties (e.g. technical deficiencies, lack of know-how, etc.) encountered by the proponent during the preparation of the environmental statements.

Overview of the proposed Technical Content of the Environmental Statement: The environmental statement should be proportionate in the consideration of the aspects of the environment listed under Paragraph 2 of Regulation 4 of the EIA Regulations. Those aspects of the environment that are subject to the most significant impacts from the components of the wider Scheme to which the application would relate should be the primary focus of the environmental statement.

The applicant has advised that it is their intention to produce a single environmental statement, which would cover the following topics:

- Historic Environment
- Landscape, Townscape and Visual Resources
- Ecology and Nature Conservation
- Geology and Ground Conditions
- Water Environment
- Traffic and Transport
- Air Quality
- Noise and Vibration
- Climate Change and Carbon
- Socio-economic Effects
- Health and Wellbeing
- Agricultural Land Use and Recreation
- Waste
- Major Accidents and Disasters

- Cumulative Effects and Inter-relationships
- Transboundary Effects

Topics proposed to be scoped out of the EIA process:

- Planning Policy Context
- Material Assets
- Radiation and Heat
- Daylight, Sunlight and Microclimate
- Decommissioning Effects
- Airspace Change Process

Waverley Borough Council has indicated in previous consultations in relation to the airport's expansion that it is generally supportive of the potential economic growth provided it can be clearly demonstrated that no negative impacts in relation to traffic congestion, air-quality, noise, biodiversity and habitats implications for Waverley residents and businesses arise.

The eastern boundary of the Borough is located only 9 miles (14 km) west of the runway. The Borough therefore sits beyond the 5km buffer from the application site where the majority of topic areas listed above will be tested, including: landscape, topography, geology, flood risk, air-quality management area and baseline (Figure 7.7.1) and Baseline Noise Level Survey (7.8.1).

The Air Noise Baseline for day and night, Figure 7.8.2 and 7.8.3, includes one site within the Borough at Alfold where Air Noise Baseline for both day and night will be measured. The site between Ellen's Green and Oakwood Hill appears to be on the edge of the Waverley Borough boundary. The Council is concerned about potential noise impacts over a wider area, including other parts of Waverley Borough, and considers that these should be addressed in the Environmental Statement. This should also have regard to noise impacts at different times of the day.

No air quality measurement sites are located within the Borough or indeed beyond the close confines of the Gatwick Site. Any potential impacts on air quality from aircraft, over a wider area, including Waverley Borough, need to be fully assessed and the methodology for the assessment should take account of this. Additional vehicle movements across the Borough or its fringes as a result of the airports expansion may also have an impact on the air quality within the Borough, this will need to be considered.

In relation to transport matters, the Council would be interested in understanding further how sustainable access to the Airport can be improved for Waverley residents and businesses as part of the development.

The climate change baseline presented in the scoping request report deals with increases in temperature and of

greenhouse gas emissions. The area that would be affected by the development, in terms of the greenhouse gas emissions attributed to the relevant boroughs should be included as part of the EIA. Aviation is set to be the biggest source of UK emissions by 2050. The assessment should include a cumulative impact of CO2 emissions arising from both the proposed Gatwick and Heathrow expansions and how these may impact on Waverley Borough residents and businesses as well as the environment, biodiversity and habitat.

I trust you will take these comments into account.

Yours faithfully

Patrick Arthurs

Patrick Arthurs
Major Sites Consultant

26 September 2019

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by Gatwick Airport Limited (GAL) (the Applicant) for an Order granting Development Consent for the Gatwick Airport Northern Runway (the Proposed Development)

Scoping consultation

Response from Wealden District Council

Wealden District Council ('The Council') must be satisfied that the Scoping Report has been prepared in line with the EIA Directive and with reference to the Planning Inspectorate's Advice Note Seven (Planning Inspectorate, 2017a). The Council's proposed comments below (Table 1) demonstrate that there is general conformity with the PINS advice note, subject to some additional considerations and further comments that are provided on the scoping exercise, outlined in this response.

Table 1 – Requirements of PINS Advice Note Seven

Advice Note Requirements	Location within Scoping Report	WDC Comments
The Proposed Development		
An explanation of the approach to addressing uncertainty where it remains in relation to elements of the Proposed Development e.g. design parameters	Uncertainty is addressed within the methodology section of this report at Chapter 6.	The Council are content that the ES can deal with uncertainty. The draft Development Consent Order will be prepared in conjunction with the ES in order to ensure key parameters applied for are consistent with those assessed through the EIA process.
Referenced plans presented at an appropriate scale to convey clearly the information and all known features associated with the Proposed Development	Chapter 5 includes numbered plans (referenced within the text) that illustrate key features of the Project.	Plans are presented at an appropriate scale in Volume 2 of the report and are referenced in the description of the project in Volume 1. These present the main features of the project.
EIA Approach and Topic Areas		
An outline of the reasonable alternatives considered and the reasons for selecting the preferred option	Chapter 3 provides an overview of alternatives considered to date and the reasons for selecting the Project.	The Scoping Report details the 3 Scenarios that were presented at the Masterplan consultation stage and concludes the overall sustainability benefits in selecting Scenario 2. Scenario 3 was not progressed as Heathrow was the

Advice Note Requirements	Location within Scoping Report	WDC Comments
		chosen option for an additional runway.
A summary table depicting each of the aspects and matters that are requested to be scoped out allowing for quick identification of issues	A summary table is provided in Chapter 9.	A useful summary table is presented in the report and attached at Appendix A. The Council has specific comments on the scoping exercise at paragraph 13.
A detailed description of the aspects and matters proposed to be scoped out of further assessment with justification provided	Chapter 7 sets out the proposed scope of the EIA process and details of the elements of topic-specific assessments that are proposed to be scoped out. Chapter 8 sets out details of topics proposed to be scoped out of the EIA process. Appendix 9.1.1 provides further detail regarding the scoping out of matters.	The Council consider this has been evidenced in the stated chapters, but have specific comments to certain topic areas and additional matters to be considered in paragraph 13 of this report.
Results of desktop and baseline studies where available and where relevant to the decision to scope in or out aspects or matters	Chapter 7 provides an overview of the desktop data and studies undertaken to date.	The Scoping Report adequately details data that has been recorded/collected to date for each topic area.
Aspects and matters to be scoped in, the report should include details of the methods to be used to assess impacts and to determine significance of effect eg criteria for determining sensitivity and magnitude	The overarching approach to evaluating the sensitivity of receptors, magnitude of impact and significance of effects is provided in Chapter 6.	The Scoping Report adequately details the methods used in the 'Approach to Assessment of Effects' for each topic area.
Any avoidance or mitigation measures proposed, how they may be secured and the anticipated residual effects	Chapter 7 provides an overview of the mitigation proposed, as far as this is known at this stage. The EIA process will lead to the refinement of mitigation measures needed.	It is considered that the Scoping Report adequately assesses mitigation measures at this stage in the EIA process.
Information Sources		
References to any guidance and best practice to be relied upon	Chapters 6 and 7 provides details of good practice guidance. Full references are provided in Chapter 11.	There is satisfactory evidence of referencing good practice guidance throughout the Scoping Report.
Evidence of agreements reached with consultation bodies (for example the statutory nature conservation bodies or local authorities)	Chapter 7 provides an overview of the consultation undertaken to date for each topic.	It is not clear whether any agreements have been reached by consultation bodies as required in the advice note. It would be useful under each topic if a section to cover this element is provided as some of the information may be lost in the text.
An outline of the structure of the proposed ES.	The proposed ES structure is set out in Chapter 10.	The Council consider an appropriate structure is detailed in Chapter 10.

The Council must also be content that all relevant issues have been appropriately screened in or out as part of the scoping exercise. The Council supports in principle the outcome of the scoping assessment, subject to the following comments:

- Air Quality – The Council consider that all appropriate considerations have been made. However, we would question scoping out ‘odours from construction phase’ when the report is uncertain whether odorous materials will be excavated or not as part of building plans. The same principle applies to emissions of other pollutants from aircraft emissions, where the report states that the effects are unlikely to be significant. Whilst it is appreciated that the Defra TG 16 Guidance note does not require the assessment of other pollutants than those listed, there is still ambiguity whether concentrations of these pollutants will exceed their respective air quality standards. It is therefore reasonable to scope this in;
- Noise and Vibration – The mitigation and monitoring section of the scoping report states that an adjustment of the flightpaths 12m further north is unlikely to require a formal ‘airspace change process’ to enable the dual runway operation and that a majority of flights would be 1,000ft in the air before they leave the airfield. It is not satisfactorily clear whether an assessment of the length of potential noise disturbance has been taken account of, and the times of day that the noise disturbance will take place. This should form part of the scoping assessment. Wealden District Council are also concerned that the formalisation of night flight operations at Heathrow Airport will put pressure on Gatwick Airport to provide later or earlier flights that could impact residential amenity. Heathrow Airport should be assessed as an appropriate ‘in combination’ impact;
- Ecology and Nature Conservation – The Council must be content that any potential impacts to the Ashdown Forest Special Area of Conservation have been taken into account and are satisfactorily scoped into the assessment. The Council will require detailed assessments to be undertaken in relation to the impact of traffic and airplane emissions. The Council would recommend the EIA scoping assessment list all of the relevant ‘designated sites’ that it will test effects of development on;
- Landscape, Townscape and Impact on Tranquillity – Suitable reference and consideration is given to the High Weald Area of Outstanding Natural Beauty (AONB) and an assessment of the impacts on tranquillity is scoped in as this is an important part of the AONB’s designation. However, it is not clear if impacts on tranquillity is generally assessed for all areas which are within affected zones or whether this is just in relation to the AONB;
- In Combination Impacts – The Scoping Assessment considers this can be dealt with through a Cumulative Effects Assessment. However this does not take into account the development of projects beyond the ‘Zones of Influence’ that can have an impact on the operation of Gatwick Airport, such as the development of a new runway at Heathrow Airport and its potential to impact the operations at Gatwick in line with comments on noise and vibration above.

Conclusion

As with previous consultation responses, it is important to safeguard Wealden District Councils' interest in relation to the potential environmental impacts of growth at Gatwick Airport, and as such maintain the key environmental impacts of concern in relation to noise levels and air pollution, especially in relation to the Ashdown Forest Special Area of Conservation.

The Council welcomes the opportunity to provide a response to the Scoping Assessment undertaken by GAL for the proposed project at Gatwick Airport, and it considers overall in the main that appropriate matters have been addressed and scoped in to the assessment for EIA purposes. Through looking at the topic areas and the issues that have been scoped in and out of the assessment, the Council considers that a few additional aspects in relation to air quality, ecology, noise/vibration and landscape, townscape and impact on tranquillity should be scoped in rather than out of the assessments. These would include areas where the effects have been assessed as unknown or uncertain, but could be potentially significant.

The Council also seek to ensure that through assessment of cumulative impacts that the implications of Heathrow's expansion and new runway on Gatwick Airport is identified and explored. Although the project at Heathrow is outside of the 'Zone of Influence', it could influence the running of night flights at Gatwick which will impact residential amenity of communities located within close proximity to Gatwick Airport, including locations in the north of Wealden District.

The Council welcomes the opportunity to be involved in future consultation stages in relation to the Development Consent Order at Gatwick Airport, especially in relation to the publication of the supporting Habitats Regulation Assessment and Strategic Environment Assessment and any associated Scoping stages.

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 - Regulations 10 and 11: Application by Gatwick Airport Limited for an Order granting Development Consent for the Gatwick Airport Northern Runway

1. WSCC is a 'host authority' in relation to the Gatwick Airport Northern Runway Development (the Project), with the airport and majority of the project site located within Crawley Borough, in West Sussex.
2. The following provides the formal response of West Sussex County Council (WSCC) to the Planning Inspectorate's consultation on Gatwick Airport Limited's (GAL's) application for an Order granting Development Consent for the Gatwick Airport Northern Runway (PINS ref. TR020005-000008).

Approach to Environmental Impact Assessment (EIA)

3. WSCC has concerns that at this stage, the project is not defined enough for its significant effects to be identified, and therefore, for a robust Scoping Opinion to be provided.

Extent and Location of Development

4. There is significant uncertainty regarding the location and scale of a number of elements of the Project. These include developments which would be significant development in their own right – for example the CARE (waste management) facility (figure 5.2.1a), the wastewater treatment works (WWTW) (figure 5.2.1e – labelled incorrectly as 'water works'), three new hotels, and two office blocks (figure 5.2.1c). The location and extent of works to the highway is also unclear. Several options have been given for the location of each of these facilities, resulting in the Project having a number of possible arrangements. This being the case, it is difficult to identify a 'worst case scenario', particularly across all topics.
5. For instance, the area east of the railway corridor and south of the A23 could potentially accommodate two new multi-storey car parks, parking on Pentagon Field, a hotel/office block, a new wastewater treatment works, and three new ponds/lagoons, as well as road widening works. The potential impacts of all of these works are significant, particularly alongside the existing significant rail/road infrastructure, and taking into account sensitive receptors including ancient woodland, public rights of way, listed buildings, a scheduled monument, and with the new North East Sector residential area to the immediate south.
6. Similarly, the north-west of the airport is shown to include an energy-from-waste facility in one of two locations, along with, potentially, a wastewater treatment works. By themselves, these facilities would have the potential for significant effects which may render them EIA development. To have uncertainty over their location, particularly when considered alongside other large-scale development, makes the robustness of the EIA scoping process questionable.

7. There is also uncertainty in other areas. There is reference to the relocation of Pond A (paragraph 5.2.55), but no indication of where the new pond will be sited. There is reference to existing substations being relocated and two new substations provided (paragraph 5.2.62) but no indication where.
8. Only two hotels are shown on figure 5.2.1c, where the text indicates (paragraph 5.2.41) three are proposed. Similarly, only one location for an 9 storey office block is shown where the same paragraph indicates 'up to' two office blocks would be provided. These facilities have the potential for significant impacts in their own right, let alone in cumulation with the wider project, so it is difficult to be definitive about whether the proposed scope of the EIA is sufficient.
9. The provision of environmental mitigation/enhancement to offset the project is also unclear. Three areas have been shown (figure 5.2.1g), including Riverside Garden Park which is an existing green, public open space. It is unclear what is proposed in any of these areas but particularly what could be achieved at Riverside Garden Park, so it is impossible to draw conclusions about the potential impact, positive or negative, significant or otherwise.
10. While existing staff numbers have been set out (see paragraph 4.4.25), no forecast of staff numbers has been provided. It is impossible, therefore, to quantify the potential for significant impact of employment on, among other things, local populations, community facilities, or the road network and other infrastructure.
11. The location and extent of works to the highway required to facilitate the Project is also unclear. While possible highway junction improvements have been identified at the North and South terminal roundabouts, transport modelling has not yet been finalised, so the scope of improvements required to the highway network is unclear. It is likely that works will be required beyond these two junctions, but the location and scope has yet to be defined, so the resultant impact cannot be determined.
12. Further, there are works referred to in the Scoping Report with vague descriptions, and without being included on the accompanying plans, such as new cargo facilities, satellite fire station, new piers and stands, works to forecourts.
13. It is considered that there is too much uncertainty regarding the extent and location of development for conclusions to be drawn regarding the potentially significant effects of the Project as a whole.

Baseline

14. The baseline data is also unclear. The 'do nothing' scenario (scenario 1) refers to there being 61 million passengers per annum (mppa) variously by 2032 (paragraph 3.2.4) or 2038 (paragraphs 1.3.3 and 4.5.1). It is also unclear why a 2032 date was used in the Masterplan, but a 2038 date in the DCO project. Clarity should be provided over how the same figure was reached (61mppa) over a longer period of time (2032 vs. 2038).

15. In addition, the baseline increase to 61mppa by 2038 appears to rely on a number of developments coming forward, as stated in paragraph 5.2.5. Section 4.3 of the Scoping Report sets out various projects which are 'proposed or consented' and would come forward in the absence of the Project. It is unclear which require and have planning permission and therefore certainty that they can be delivered. The development includes a new multi-storey car park (paragraph 4.3.6 - capacity 4,250), an extension to the BLOC hotel (paragraph 4.3.8), the use of robotic car parking (paragraph 4.3.6), and local widening (paragraph 4.3.7 – albeit planning permission would only be required if the works were EIA). The planning status of these must be clarified so there is certainty over the baseline.
16. We would also query whether a 'low growth' scenario should be considered, particularly taking into account the pressures around climate change and the government's stated commitment to a emissions' reduction target of 100% by 2050 (as set out in the Climate Change Act 2008 (2050 Target Amendment) Order 2019), and the more immediate potential impact of Brexit.
17. An accurate assessment of the impact of the scheme cannot be undertaken without clarity over the baseline it is comparing against.
18. We would also query why the increase in passenger numbers from 43mppa to 61mppa by 2038 and the works GAL have described to facilitate it would not itself be considered a NSIP, given the increase would be more than 10mppa, requiring alterations to the airport.

Extent of Related Development

19. The proposed DCO relates to 'alterations to increase airport capacity', as set out in Section 23 of the Planning Act 2008. The Developer is proposing works, set out in Section 5 of the Scoping Report, to increase the airport throughput.
20. However, we would question whether the inclusion of three new hotels and two office blocks is relevant or directly related to the proposed increased capacity. We would suggest that the developer should clarify why these developments in particular are needed to facilitate the airport expansion, and that they are directly linked to it. We would suggest that they are functionally separate and not required to enable the airport expansion so should be excluded from the Project.
21. In considering this, we note that under the baseline scenario set out at Table 4.6.1, the airport could increase by 15mppa (from 46mppa in 2018 to 61mppa in 2038) with only a 250 hotel room increase, and no increase in office space. To increase passengers to 74mppa over the same period, it is proposed to provide more than 800 additional bedrooms (paragraph 5.2.41 notes two new hotels with up to 400 bedrooms, and a third hotel with unspecified room numbers), and offices with 8,920m² of floor space.
22. This being the case, we would again question whether the hotels/offices are necessary to bring the Project forward.

Conclusion

23. The lack of clarity around the Project raises concerns that its potential significant effects have not been accurately identified in the Scoping Report. It also raises the risk that the project could materially change prior to the submission of the DCO application, requiring an additional EIA Scoping process.
24. Without defined end uses for land within the project boundary, or indeed a fixed project boundary, it is difficult, if not impossible, to determine what the significant effects of the project may be, both as a whole, and on individual locations. While we recognise that there needs to be flexibility in the project at an early stage, we consider that the parameters set out in the Scoping Report are too broad for robust conclusions to be drawn on its significant effects.
25. We acknowledge the Rochdale Envelope Approach which necessarily allows a degree of flexibility in schemes by defining development parameters and assessing the reasonable worst case. However, as per the PINS Advice Note 9, there needs to be sufficient information at the EIA Scoping stage to understand the proposals, and their potentially significant effects. It is not considered this Scoping Report meets that test.

The remainder of this response addresses the Scoping Report using the relevant paragraph references:

Paragraph	Comment
1.6.1	This should include reference to population and health as well as the environment.
Table 2.2.1	The West Sussex Waste Local Plan (2014); and West Sussex Joint Minerals Local Plan (2018) also form part of the development plan so should be considered.
2.3.5	Notwithstanding the consultation required through the SoCC once approved, we would encourage early engagement with affected communities.
Diagram 2.3.1	The engagement structure should include a health and wellbeing group encompassing, for example, the local health and wellbeing partnerships, services, blue light services and the CCG. We suggest that the local authority consultation groups are broadened to include the relevant statutory consultees (Highways England, the Environment Agency etc.) so the consultation process is transparent and information is known to all parties.
Section 3.2	It is considered that a 'low growth' scenario should be added to account for the possibility the growth of the airport will be limited by climate change considerations and/or Brexit.
Section 4.3	Clarity should be provided over which of the 'proposed/consented projects' require and have planning permission and therefore certainty that they can be delivered, and what the implications would be if they could not be delivered. As per paragraph 5.2.5, the Project baseline assumes that the development set out in this

	Section can be delivered, so it is important that the position is clarified.
5.2.5	Clarity should be provided over the assumptions made in relation to the proposed/consented projects required to reach the 61mppa baseline by 2038.
5.2.18	The installation of an energy-from-waste (EfW) facility requiring a stack of up to 50m in height has the potential for significant environmental effects in its own right. The EIA <u>must</u> include full details of the EfW and CARE facility, including the type of waste managed, the throughput, how it is processed, the outputs, and what mitigation will be in place to ensure impacts are contained.
5.2.43	<p>The effect of increasing car parking spaces by 17,500 net on mode share will need to be taken into account in forecasting. Should provision of additional spaces run at a faster rate than demand for additional travel capacity and employee numbers, this could affect pricing policy for parking which could, in turn, attract car travel and change the impacts of the Project.</p> <p>GAL should ensure the Transport Assessment methodology identifies trigger points that can be linked to mode share targets and traffic flow monitoring to inform the design and phasing of the development and the Airport Surface Access Strategy (ASAS).</p>
5.2.45 – 5.2.50	<p>The Scoping Report notes that the increase in traffic volumes is likely to be greatest at the North and South terminal junctions, so highway junction improvements are planned at these roundabouts. However, this is not necessarily the case, and it is likely that further highways and transport improvements (not constrained to junctions) will be required off-site to be identified through the Transport Assessment process to meet the NPPF criterion of resolving severe residual cumulative impacts on the road network. These may include increased segregation of sustainable modes of transport whilst maintaining capacity for general traffic or in some locations could require additional capacity for all vehicles.</p> <p>Care needs to be taken to ensure in designing highway improvements that they do not lead to traffic redistribution and create new congestion hotspots or exacerbate existing ones, particularly if new journey opportunities are created – for example the North Terminal Roundabout providing access to the A23 London Rd southbound. As well as Highways England, GAL should involve Local Highway Authorities in the development of junction improvements, given the close proximity of the respective jurisdictions, notably the North Terminal roundabout.</p> <p>At this stage, therefore, the potentially significant impacts of the development on the transport network, and the scope of mitigation measures have not been fully established. The scope of the development cannot be confirmed until GAL has completed the Transport Model and undertaken a Transport Assessment, including developing a new ASAS in liaison with relevant stakeholders.</p>

5.2.41	This text indicates that three new hotels are to be provided, but Figure 5.2.1c only shows two. The text also indicates that 'up to two' new office blocks would be provided, but only one location is shown on Figure 5.2.1c.
5.2.52	The conclusion that further works to the rail station are unnecessary is premature, given that studies to confirm rail station capacity are still being undertaken. It is unclear what the conclusion is based on: what rail share mode has been assumed, and how this relates to maximum passenger throughput.
5.2.55	No indication of the location of the relocated Pond A has been given.
5.2.62	No indication of the location of the two new substations has been given.
5.2.63	<p>Consideration should be given to increased use of renewable energy.</p> <p>Also, the forecast energy usage considered in the Power Strategy must account for increased electrification of airside vehicles (as set out in paragraph 7.7.39), and presumably increased electric vehicle charging points in carparks.</p>
5.2.67	A Sustainability Statement should be prepared as soon as possible to feed into the evolution of all elements of the Project.
5.2.68	<p>It is suggested that the 'waste' bullet point should aim for zero waste to landfill (i.e. minimal amounts of waste to landfill through maximising the recycling and treatment of waste, as per the West Sussex Waste Local Plan) rather than no untreated waste to landfill. Maximising the recovery of energy and heat from waste should also be included.</p> <p>The 'energy' bullet point should aim to maximise the use and, where possible, production, of renewable energy.</p>
Table 5.3.1	<p>The scheme would be fully operational for additional flights in 2026, and the additional car parking would be introduced over a period from 2022-33. However, the surface access improvement works are stated to be phased over the period 2025 - 30. This means that very few of these improvements would be in place for the commencement of expanded air services in 2026, whilst airport traffic over the period to 2030 is likely to be impacted by construction works at the main junctions accessing the airport terminals.</p> <p>As a result, the surface access transport strategy is very heavily dependent on the forecasts of the uptake in additional flights, passenger demand and additional employment arriving gradually over the period following the availability in operation of the additional runway.</p> <p>Parking being increased in capacity prior to road capacity being made available could lead to additional avoidable congestion on the airport approaches. Whilst this could add a push factor towards sustainable transport options for airport access, it could also be</p>

	<p>disruptive for other travel in the area including airport buses and coaches, and Crawley-Horley bus services.</p> <p>It is notable that there is no reference in the Scoping Report to improvements to or increase in provision of bus services to/from the airport, or other sustainable transport modes.</p> <p>GAL should ensure the Transport Assessment methodology identifies trigger points linked to mode share targets and traffic flow monitoring to inform the design and phasing of the development and the ASAS.</p> <p>The surface water improvements are scheduled for between 2026 and 2034, whereas as with any project, they should be in place before development comes forward to ensure drainage is properly managed, and there is no increase in flood risk.</p>
Table 5.4.1	<p>The increase in employee numbers during the operational phase has not been specified in the Scoping Report. Paragraph 4.2.25 identifies the number of existing employees, and paragraph 3.2.17 states that the Project would have 'increased employment and economic benefits to the local area' but no attempt has been made to quantify this. GAL must include the change in the number of on-airport employees during the operational phase in the summary of key parameters to ensure the impacts of additional employees are taken into account. The number of employees required to achieve the baseline should also be clarified.</p> <p>The increase in staff numbers would have a range of impacts, including socio-economic impacts (and demand for local services), and on the highway network.</p> <p>Employees are more likely to live locally, and therefore employment-related trips to originate locally, having a disproportionate impact on the local transport network. The Project would increase the number of on-airport employees and include facilities (e.g. car parking) to facilitate this.</p>
Approach to EIA	
6.2.11	<p>Given the significant uncertainty around the delivery of the Heathrow third runway, the 'worst case scenario' for growth should be that it is not delivered (or at least not within the assessment period).</p>
6.2.35	<p>We support the use of the Rochdale Envelope, but clarity must be provided over the assumptions made to ensure that it is indeed the 'worst case'. At this stage there is significant uncertainty over both the baseline and the proposed development so it is not considered a 'worst case scenario' can be identified with any certainty. As a result, the potential significant effects of the Project cannot be identified with any certainty.</p> <p>The Planning Inspectorate's Advice Note 9 explains the use of the Rochdale Envelope in the DCO process, with the 'key propositions' emerging from the two Rochdale cases including "<i>the "sufficient information to enable 'the main,' or the 'likely significant' effects on</i></p>

	<p><i>the environment to be assessed [...] and the mitigation measures to be described” (para 104 of the Judgment);” and that “the need for flexibility should not be abused.” It is considered that the Scoping Report incorporates an unnecessary degree of flexibility and therefore uncertainty as to the potential significantly environmental effects.</i></p> <p>Paragraph 3.4 of the Advice Note states, in relation to the pre-application process, that the bodies consulted need to be able to understand the proposals. The proposals currently lack detail and clarity so once the Project has evolved, it will in all likelihood be materially different from that set out in the Scoping Report, so a further Scoping Opinion will be required.</p>
	<p>Historic Environment</p>
7.1.2	<p>The list of guidance documents should also include:</p> <ul style="list-style-type: none"> • Sussex Archaeological Standards (2019) <p>These are non-statutory local archaeological standards used in providing development management advice by East Sussex County Council, West Sussex County Council and Chichester District Council.</p>
7.1.9	<p>Deeper deposits of potential geoarchaeological and palaeoenvironmental significance (e.g. late glacial channel deposits, alluvial deposits) may survive below areas of previous heavy ground disturbance.</p>
7.1.18	<p>It is recommended strongly that the information used to inform the detailed Historic Environment DBA should include full summaries of the findings of the two archaeological investigations by GAL for the New Pollution Lagoon (Fig. 7.5.1) and Flood Alleviation Reservoir (to the south of Crawley Sewage Works), both of which are within the Project site boundary.</p> <p>The Flood Alleviation Reservoir construction site included part of a Late Iron Age cremation cemetery, which lies partly within the Water Treatment Works Option 2 Area; the cemetery, from the brief information presently available, appears to be of high archaeological significance, but its extent is not presently known. It is also recommended strongly that further information should be provided about the cemetery – its dating, quality, degree of rarity and extent - as part of the EA, e.g. following excavation of trial trenches in the close vicinity of the known discoveries.</p> <p>The Historic Environment DBA should also include an appraisal of the geoarchaeological potential of the site in relation to the proposals.</p>
7.1.25	<p>Climate change should be included as it is likely to affect the historic environment baseline over the assessment period through increased heat and rainfall undermining foundations and damaging buildings.</p>
7.1.31	<p>Some of the land within the Project site boundary, where buried archaeological features may still exist, not previously investigated</p>

	<p>or recorded, is listed. However, the following Project Elements should also be included:</p> <ul style="list-style-type: none"> • Fire Training Ground and potential Noise Mitigation Bund; • Car parking areas: Crawler’s Road Car Park & Purple Parking re-provision area; and Pentagon Field; • Waste Water Treatment Option 1; • Waste Water Treatment Option 2 (known Iron Age cremation burial cemetery on part of the site formerly a construction compound for the Flood Alleviation Reservoir, exact location of cemetery and details of archaeological investigation and recording pending); • Western part of the potential area for flood compensation; • Main Construction Compounds north and south of A23 Gatwick Spur road; • All of the Potential Environmental Mitigation and Enhancement Areas.
7.1.39	<p>The proposed scoping out of the potential effects of the Project on the significance of designated heritage assets located within the more urbanised areas of Crawley is acceptable in principle, with the reservation that such assets should be listed in the ES (e.g. in an Appendix), to facilitate review of excluded assets where desirable; and that it should be made clear there whether or not these assets are in the Zone of Theoretical Visibility associated with the Project. Further, the potential physical impact of noise insulation on historic buildings should be taken into account.</p> <p>No comments are offered here in respect of similar proposed scoping out for built-up areas of Horley (in Surrey, outside WSCC’s geographical remit).</p>
Landscape, Townscape and Visual Resources	
7.2.4	<p>We disagree with the use of a zone of theoretical visibility (ZTV) based on the heights of existing buildings, given that the proposed CARE facility would have a stack of up to 50m in height. Table 4.6.1 notes that the maximum height of the South Terminal is 40m, so this would potentially be 10m higher than the tallest feature on site.</p> <p>The final stack height is unlikely to be known until air quality/dispersal modelling has been undertaken as part of the Environmental Permitting process. With the CARE facility not being relocated until 2026 – 2034 (paragraph 5.3.6), for the purposes of the DCO process and using the Rochdale Envelope, a 50m stack height must be assumed.</p> <p>As a result, consideration in the assessment should be given to the impact of the plume, and lighting on top of the stack.</p> <p>It is also unclear whether the ZTV includes the hotels in the surrounding area.</p>

7.2.19	The baseline landscape character could significantly change as a result of climate change over the assessment period through increased drought and flood conditions.
Table 7.2.1	This should include the development at the western end of the runway, including the noise mitigation (bund or fence – details yet to be specified) and Fire Training Ground (including building to 9m in height).
7.2.33	The extent of the study area should be reconsidered once the potential impact of the 50m stack has been taken into account.
Ecology and Nature Conservation	
7.3.27	The assessment should include reference to non-road mobile machinery (hedge trimmers, lawn mowers etc.).
7.3.5	The data used to inform this Scoping Report has been limited to the Magic website. However, Local Record Centres have been enquired of and presumably the substantial incoming data will inform the ES and pick up omitted Local Wildlife Site boundaries (LWS) e.g. Horleyland Wood.
7.3.14	Early consideration should be given to the reuse of construction / demolition / excavation material within the Project site, particularly in the creation of noise attenuation bunds and landscaping features, the benefit/impact of which can then be taken into account.
7.3.43 - 44	The mitigation listed includes, avoidance, replacement and protection but no enhancement. This must be included in any proposal, in accordance with government policy.
Geology and Ground Conditions	
7.4.20	The Minerals Safeguarding Assessment should be undertaken in accordance with the draft Minerals Safeguarding Guidance (or subsequent updates).
Water Environment	
7.5.1	Reference should be made to the West Sussex LLFA Policy for the Management of Surface Water .
Table 7.5.1	LLFAs do not hold data regarding unlicensed groundwater and surface water abstractions.
Transport and Traffic	
7.6.1	The list of relevant policy documents should include the WSCC Rights of Way Management Plan 2018 – 2028 .
7.6.2	In addition to the guidance listed, the following should be included: <ul style="list-style-type: none"> • WSCC Guidance on Parking at New Developments; • WSCC Transport Assessment Methodology; • West Sussex Cycling Design Guide; • Manual for Streets;

	<ul style="list-style-type: none"> • Manual for Streets 2.
7.6.5	Traffic count data has also been collected from WSCC's traffic count database.
7.6.6	This relates solely to passenger transport patterns. It should also include employees, particularly given the significant numbers (as per paragraph 4.2.25 - 24,000 staff currently work at the airport).
7.6.12	<p>The paragraph states that <i>“Train capacity serving Gatwick has more than doubled since 2014, with new rolling stock on most of the services calling at the airport. This provides sufficient overall capacity for Gatwick to continue to grow its rail mode share over the next decade.”</i></p> <p>However, the increase in capacity has not been shared equally across all routes. It is occurred due to the increase in capacity of Gatwick Express and Thameslink services, whereas the capacity of Southern and GWR services have remained fairly static, and there continue to be no direct rail services to/from Kent. The study will need to establish if the capacity of different routes is sufficient to at least the design year of 2038, or if maintaining Gatwick's sustainable mode share to the level indicated beyond 2029 is dependent on further investment in rail capacity (such as Network Rail's "Croydon Triangle" scheme, which is not currently a committed scheme so cannot be relied upon).</p> <p>GAL should assess the impacts of the Project and identify infrastructure and service enhancements for different routes that will be needed to facilitate the development and delivery of the ASAS to at least the design year of 2038.</p>
7.6.14	The 24 hour, local bus service (Metrobus) is in part subsidised by GAL through the Sustainable Transport Fund. Clarity should be provided over whether this will be secured through legal agreement attached to the DCO (if granted), and to what degree – whether there would be an increase or decrease in subsidy, which may affect the level of service provided.
7.6.15	The proposal should include provision to investigate ways to improve bus services to/from the airport, to minimise the impact of the increase passenger and staff numbers on people, the road network, and the environment.
7.6.18	The focus here is on the M23/A23, but for south coast towns such as Worthing west to Southampton, other north-south routes are more important for access to the Airport. GAL should recognise the role that other local highway network routes such as the A22, A264, A24 and A29 perform in providing access between the Airport and the south coast.
7.6.25	GAL should not assume that sustainable transport mode share for employees will be 42%. Increasing sustainable transport mode share for employees has been challenging and progress has not proved as successful as it has been with air passengers. Therefore, GAL should consider different mode share scenarios for employee

	trips and assess the worst case, which is likely to be the continuation of current staff travel patterns. GAL should also include mechanisms to improve the uptake of sustainable travel initiatives for staff to help achieve more ambitious targets.
7.6.28	<p>The bulleted list includes <i>“West Sussex model data, including the network for the Crawley Local Transport Model, traffic counts, signal timings and details on future infrastructure and development assumptions.”</i></p> <p>However, this data has already been supplied. The exception is any further committed highways schemes which were not already included in the Crawley Model future year networks supplied, largely those in locations beyond the study area for that model. These will be supplied to GAL’s transport consultant, Arup.</p>
7.6.33 – 34	As the Gatwick Airport version of SERTM has not yet been developed and finalised, it cannot yet be used to determine the area over which significant changes to travel demand flows are likely. This means that the assessment of the extent of network over which mitigation has to be considered will be less accurate. It means, for example, that the local highway network such as A23 London Road close to the Airport is not included in the scoping area but is likely to be affected by the Project. GAL should complete their assessment and identify what mitigation measures are required before the scoping area is finalised.
7.6.34 – 7.6.38	<p>The VISSIM Models referenced have a limited study area with inclusion of West Sussex County Council roads largely limited to the A23 between the airport and the A2011 Tushmore Junction, plus a single section of A2011 eastwards to the Hazelwick Roundabout. This means that the consideration of other WSCC-managed roads which may experience changes to demand patterns due to the Project will need to be assessed through the Gatwick Strategic Model - including Gatwick Road, the remainder of Crawley Borough, and roads in Mid Sussex and Horsham districts and further afield.</p> <p>The impacts on these roads may require mitigation to ensure the residual cumulative impacts of development are not severe in line with NPPF. Therefore, GAL should add local detail to the Gatwick Strategic Model in these areas and the County Council should be consulted on its calibration and validation on County Council roads.</p>
7.6.41 and diagram 7.6.1	The proposed structure of the demand model splits airport-related highway demand into passenger and employee trips. It should be clarified that the model will also handle demand made by trips by suppliers to airport businesses and airlines –goods delivery trips - and visitors to the airport, such as people using the airport hotels without being air passengers or staff, whether being guests or attendees of the hotel conferencing facilities or visitors to on-airport businesses.
7.6.41	The extent of the model coverage is proposed to be assessed using “confirmed assessment criteria” but these are not stated here. The

	<p>criteria should be established at this scoping stage.</p> <p>WSSCC is concerned that the A27 corridor is outside the area of detailed modelling. There is a prevalence of long-standing congestion issues on the corridor that could be exacerbated by the Project. Planned housing development will not be equally distributed across the south coast and there is a choice of competing routes between A29, A24 and A23 so travel patterns can be expected to change as a result of the Project. The A27 corridor is located within the wider area of simulation modelling for which it is proposed to keep the SERTM level of detail.</p> <p>However, to ensure that the Model will accurately route traffic to/from Gatwick based on a realistic simulation of main junctions along the coastal corridor between Arun, Worthing and Brighton and Hove, the most affected parts of the A27, including the section between A27/A29 Fontwell in the west and the county boundary in the east (potentially extending to A22/A27 Polegate in East Sussex) should be included in the area of detailed modelling.</p>
7.6.42	<p>WSSCC notes that the rail modelling will extend down to and along the Sussex Coast, which is supported. It is desirable that the rail and highway modelling should be kept to a comparable standard over a similar area, so that mode share is assessed consistently, rather than being influenced by the level of modelling of travel costs in certain areas according to mode of travel.</p>
7.6.43	<p>For both the construction and operational phases it would be helpful to provide information on both the absolute and % change in traffic generation and assigned flows.</p>
7.6.47	<p>It is noted that the criteria for % change in flow for consideration of delay relates to the environmental assessment of the network. However, for the supporting Transport Assessment, tighter figures, such as the West Sussex starting point of 100PCU/hr, may be necessary to assess delays at congested junctions, as a relatively small percentage increase in flow can lead to a much higher increase in delay at peak times for road travel when the network is already congested.</p> <p>GAL should include journey times and reliability on key routes to/from the airport via both the local and strategic road networks.</p>
7.6.53	<p>As well as those listed, local highway authorities also hold information about committed developments and schemes.</p>
7.6.59	<p>The later delivery of Heathrow in 2030 is a highly plausible and worthwhile scenario to include, but it does not seem to be a worst case, that being that Heathrow does not get delivered at all in the period under consideration to 2038. If this occurred, then growth at Gatwick would be likely to occur at a faster rate than currently anticipated, potentially accelerating impacts and the need for improvements that are currently planned for later phases. GAL should also assess the impacts of a 'without Heathrow Runway 3' scenario.</p>

7.6.60	<p>TEMPRO does not take Gatwick Expansion into account. Expanding the Airport may generate a greater level of economic growth in the region.</p> <p>A potential way to overcome this could be to develop a scenario where the further development to overall TEMPRO totals by Local Planning Authority area are distributed according to the sites already considered through the SHELAA process but not yet allocated rather than through TEMPRO's defaults. This would help to ensure that additional background demand in the cumulative impact assessment originates where it is most likely to occur, rather than in proportion to existing population sizes.</p> <p>GAL should also consider other potential future growth scenarios and assess the cumulative impacts of development on the transport network in the worst case to ensure that impacts can be managed in line with NPPF.</p>
7.6.61	<p>As stated above, the Transport Assessment will need to use tighter criteria for traffic flow increases than those indicated in paragraph 7.6.47 to consider all relevant locations where a severe impact under NPPF criteria could occur and require mitigation, due to the sensitivity of congested networks. Thresholds of 5% increase or 100pcu/hr, whichever is greater, could be considered reasonable for routes which are already congested at peak times.</p> <p>Also as stated above, the Transport Assessment should take into account the West Sussex Transport Assessment Methodology for the County Council network, as well as the County Council's Guidance on Parking at New Developments and on cycling design.</p>
7.6.63	<p>The proposed approaches to mitigation are appropriate. However, they should additionally include provision to increase physical highway capacity for residual issues after these approaches have been tested, whether this is widening to allow additional segregated facilities for sustainable modes without reduction to general traffic or for increased capacity for all traffic depending on the nature of the location and transport corridor. It may also be necessary to consider additional off-site public transport infrastructure facilities in areas which are likely to see significant employee commuter demand to Gatwick.</p> <p>In practise, the Gatwick Area Transport Forum only meets annually and is not constituted as a consultative body. The Gatwick Area Transport Forum Steering Group provides a more suitable forum for consultation and coordination of approach to delivering transport objectives and initiatives.</p>
7.6.65	<p>The Construction Traffic Management Strategy needs to include consideration of how construction workers will get to site, how sustainable transportation will be encouraged, and if travelling by car, where they will park.</p>
7.6.66	<p>Consideration must be given to providing buses or other sustainable transport options for construction workers, given that up to 2,000 will be on site at peak times (see paragraph 5.3.20).</p>

	Air Quality
General	The impact on air quality resulting from aircraft and road emissions on both passengers and employees needs to be considered.
7.7.1	The West Sussex Waste Local Plan (2014) should be included in the list of policy documents, given the proposed expansion and relocation of the CARE energy-from-waste facility. For the same reason, consideration should be given to the Industrial Emissions Directive (2010/75/EU), Environmental Permitting Regulations, Waste Framework Directive,
7.7.21	Pollutant concentrations must specifically include consideration of the impact of the CARE energy-from-waste facility.
7.7.23	In addition to those listed, sensitive receptors considered should include airport users (including passengers) and employees.
7.7.22	The list of pollutants assessed should be expanded to include consideration of the emissions from the stack of the CARE energy-from-waste facility, including (subject to EA confirmation) sulphur dioxide, total organic carbon, hydrogen chloride, carbon monoxide, cadmium/thallium and their compounds, mercury and its compounds, dioxins/furans, and heavy metals.
Table 7.7.3	The impact of the CARE facility, and the proposed wastewater treatment works, must be explicitly and separately set out. The impact of the potential increased use of Crawley Goods Yard as a source of aggregate during the construction phase should be scoped in, particularly given its reliance on HGV access through the Hazelwick Air Quality Management Area.
7.7.28	The impact of the CARE facility, and the proposed wastewater treatment works, on air quality must be explicitly and separately set out.
7.7.30	The data regarding emissions from road vehicles must separate out airport-related traffic from non-airport related traffic.
7.7.31	The impact of the CARE facility, and the proposed wastewater treatment works, on air quality must be explicitly and separately set out.
7.7.32	The scenarios considered should compare the baseline with the anticipated opening year (2026), as well as 2029, and 2039.
7.7.33	The grids used for the modelling of air quality must be consistent over time. Air Quality modelling for this project will be using a 10km x 11 km grid, yet previously (ARUP for 2015) used 10km x10km, and historically 10km x 8km was used which makes a comparison of ratio of airport to non-airport car traffic emissions from previous work impossible.
7.7.36	It is understood the assessment will be based on meteorological data from 2018. The data must take into account increased temperatures due to climate change and the resulting increase Auxiliary Power Usage as once above 25C the standard Gatwick

	Airport Directives (GAD) no longer apply.
7.7.39	<p>The EIA should clearly set out the mitigation proposed to ensure that the CARE facility and WWTW do not result in odour impacts, or impacts through other emissions to air, on either people or the environment.</p> <p>Consideration of air quality impacts and the mitigation/monitoring required should link closely with the Health Impact Assessment and more general considerations of health.</p>
7.7.40	<p>The proposal to scope out pollutants other than NO_x, NO₂, PM₁₀ and PM_{2.5} is not supported because it is not only road and air traffic that are relevant.</p> <p>The list should be expanded to include consideration of the emissions from the stack of the CARE energy-from-waste facility, including (subject to EA confirmation) sulphur dioxide, total organic carbon, hydrogen chloride, carbon monoxide, cadmium/thallium and their compounds, mercury and its compounds, dioxins/furans, and heavy metals.</p> <p>The list considered in the assessment, and in future monitoring, should also include ultra-fine particles.</p>
Noise and Vibration	
General	WSCC endorses the response from Crawley Borough Council regarding noise/vibration matters.
Table 7.8.3	The impact of the potential increased use of Crawley Goods Yard as a source of aggregate during the construction phase should be scoped in, particularly as operations may occur overnight when the noise environment is particularly sensitive.
Climate Change and Carbon	
7.9.8	The Climate Change Act 2008 (2050 Target Amendment)(Order 2019) should be included in the list of key legislation.
7.9.11	The list of Guidance Documents should include the National Adaptation Programme .
7.9.15 and 7.9.18	The ICCI assessment should consider the impact of the heat island effect resulting from works proposed to 2038 (including additional concrete/hardstanding/buildings), as set out in table 4.6.1.
7.9.34	The cumulative impact of the Project along with other airport projects, particularly the Heathrow expansion, should be considered.
7.9.39	The assessment of future impact should consider the heat island effect of increased concrete/hardstanding/buildings.
Table 7.9.3	<p>This should explicitly include:</p> <ul style="list-style-type: none"> • the potential impact of increased drought/storm weather on runway surfaces through cracking; • overheating in buildings;

	<ul style="list-style-type: none"> health impacts on staff during construction/operation.
	Socio-Economic Effects
Table 7.10.1	<p>As well as local plan allocations, future baseline sources should include the West of Ifield development being promoted by Homes England.</p> <p>Demographic/Labour Market: the Future Baseline Sources should include ONS mid-year population estimates.</p> <p>Community Facilities: the Future Baseline Sources should include reference to the DfE's 'Assessing the Net Capacity of Schools' and/or Building Bulletin 103 which gives guideline sizes for school accommodation. WSCC's most up to date 'Planning School Places' should be referred to for baseline sources.</p>
7.10.5	The baseline conditions must specify existing employee numbers and predicted employee numbers resulting from the baseline scenario.
7.10.12	The baseline conditions must specify existing employee numbers and predicted employee numbers resulting from the baseline scenario.
Table 7.10.2	The effect of new jobs being created at Gatwick resulting in local labour shortages should be considered, particularly in relation to low-skilled sectors.
Table 7.10.3	The effect of new jobs being created at Gatwick resulting in local labour shortages should be considered, particularly in relation to low-skilled sectors.
7.10.22	It will be important to include and where possible agree specific, long term measures for mitigating and enhancing the potentially significant socio-economic effects that have been identified. These should consider (but not be limited to) housing, education, health, community safety, and prioritising the use of local supply chains.
7.10.24	<p>WSCC strongly opposes the scoping out of the effect of the Project on the population during either the construction or operational stages.</p> <p>Paragraph 4.2.25 of the Scoping Report notes that 24,000 staff work at the airport, including 3,000 employed directly by GAL, and paragraph 3.2.17 of the Scoping Report highlights that the Project would result in 'increased employment and economic benefits to the local area'. However, no indication has been given of the likely staff numbers as a result of the airport expansion so it is impossible to establish whether there would be a significant socio-economic impact purely relating to increased employees.</p> <p>Further, the majority of staff working at Gatwick live close to the airport so it is difficult to understand the statement that 'future labour market will be distributed across a wide labour catchment area'.</p> <p>Given the lack of detail provided, it is difficult to be definitive but it is considered that the Project has the potential to result in significant effects on the local population and the population</p>

	further afield. The airport is a significant employer for the population of West Sussex and beyond, so the proposed expansion has the potential to increase employment numbers, with the resulting impact on demand for houses and local services, as well as economic benefits.
	Health and Wellbeing
7.11.1	The following should also be included: <ul style="list-style-type: none"> • West Sussex Joint Health and Wellbeing Strategy; • Public Health England data; • Crawley Local Joint Strategic Needs Assessment; • Health and Social Care Act 2012; • Public Health England Strategic Plan 2016; • Prevention Vision 2018; • NHS Long Term Plan 2019; and • 'The State of the Union'.
7.11.3	The methodology for carrying out the HIA should be agreed with consultees before being undertaken.
7.11.7	The public health indicators used do not take a holistic approach to health and wellbeing, and do not capture or emphasise the importance of mental health. Also, based on the health intelligence that they do capture, it is unclear how local needs will be addressed.
7.11.33	As well as health promotion, protection and care this should include prevention and response.
7.11.36	Hazards can only be designed out by supporting the delivery of local health priorities and objectives if local health services are engaged with - local health and wellbeing partnerships, health and wellbeing board and services etc.
7.11.38	This should consider how they will capture and address unintended consequences, particularly given the significant uncertainties with the Project. It is unclear what 'barriers to health benefit' are considered to be and how it is intended to address them.
7.11.58	The Project should clarify how will they support the increased workforce to access local health services, and what the cost implications of this will be for local public health and social care services, including if workers from outside of the area are accessing sexual health and other such services.
	Agricultural Land Use and Recreation
7.12.1	The list of relevant policy documents should include the WSCC Rights of Way Management Plan 2018 – 2028 .

Waste	
7.13.1	It is suggested that given the proximity of the Project to Surrey, this should include the adopted and emerging Surrey Waste Local Plans.
7.13.4	It is unclear whether the CARE facility manages all waste from the airport. This should be clarified, and the existing and proposed management of waste streams set out in the EIA.
7.13.9	As well as designing out waste, opportunities to use waste within the site should be considered.
7.13.11	A technical appendix setting out how the CARE facility would be used is not sufficient when an expanded EfW facility with a stack of up to 50m in height is proposed. Full details must be provided to enable consideration of significant impacts.
Cumulative Effects and Inter-Relationships	
Table 7.15.3	Because of its scale, the West of Ifield development being promoted by Homes England must be considered. This is proposed to deliver 10,000 homes in close proximity to the airport.
7.15.26	As well as residents, impacts on staff and airport users should be considered in terms of noise and air quality.
Topics to be Scoped Out	
8.5.1	Before microclimate impacts are scoped out, an assessment should be made of the extent of additional hard standing / impermeable surfacing of the Project, and the cumulative impact in terms of creating a heat island.
8.7.3	Airspace changes should be scoped in to each Topic as further details become available.
Structure of ES	
10.1.3	The list of technical appendices should also include the following: <ul style="list-style-type: none"> • Health Impact Assessment; and • Sustainability Assessment.