



Gatwick Airport Northern Runway Project

Consultation Report Annex B - Autumn 2021 Consultation Consultee Response Summaries

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Annex B – Autumn 2021 Consultation Section 42 consultee response summaries

1 Summary of responses Prescribed Consultees, Local Authorities, Town and Parish Councils

1.1 Abinger Parish Council

- 1.1.1 Abinger Parish Council opposes the Project due to local and wider impacts. Key issues raised are noise, night noise, traffic and development pressure. The Council is a member of Gatwick Area Conservation Campaign and supports its campaign against the Project in relation to wider impacts.
- 1.1.2 The Council notes that parts of the parish experience overflights during both easterly and westerly operation. It expects that the increase in air traffic movements due to the Project will be detrimental to the parish as the increased noise events will be noticeable. The Council disagrees that aircraft design will result in a 2 dBA reduction in sound levels in the short term, noting that commercial aircraft have a life of around 25 years and many flying today will still be in the air after the Project is completed.
- 1.1.3 The Council believes the Project will likely increase the number of night flights and is strongly opposed to this, citing the health impacts of sleep disturbance as a key issue, and noting that Gatwick is understood to have the second highest number of permitted night flights of any airport in the country.
- 1.1.4 The Council opposes the proposed increase in car parking spaces and associated traffic as well as any increase in HGV movements as a result of increases in freight. It notes the potential impact of motorway congestion on local roads and rural lane routes, particularly on the B road through Charlwood.
- 1.1.5 The Council also objects to the effects of airport development on rural areas.
- 1.1.6 The Council supports the Gatwick Area Conservation Campaign against the Project on wider issues, which includes:
- A credible case for expansion has not been made.
 - The increased use of the main runway requires prior examination in order to comply with government policy.
 - The projected increase in business travel is wildly exaggerated.
 - There is substantial spare airport capacity currently available.
 - The noise envelope proposals are one sided and outdated, favouring Gatwick.
 - The expansion proposals do not reduce noise as is required by government policy.
 - The analysis of the noise impacts is cynically misleading and does not meet CAA requirements.

- There is no credible CO2 emission removal or limiting technologies that could be used at scale.
- The proposals would increase CO2 emissions by almost 50%.
- If it were to go ahead Gatwick generated CO2 emissions would be 5.5% of the entire UK emissions by 2038.
- Non-CO2 global warming effects (con trails etc) which are substantial have not been allowed for.
- The employment benefit analysis is misleading, the project is unlikely to result in net job creation.
- There are a large number of unsupportable assumptions, omissions and errors in the proposals.
- Were the above corrected it is likely the scheme would have an unattractive negative net present value.

1.2 Association of Parish Councils Aviation Group

- 1.2.1 The Association of Parish Councils Aviation Group (APCAG) strongly opposes the Project on the basis that the proposals will result in a significant increase in aircraft noise, an increase in CO2 emissions, more congestion on roads around the airport, and additional demand on local resources. It also notes that increasing aircraft traffic is not in line with COP26 proposals.
- 1.2.2 APCAG challenges the employment benefits associated with the Project, suggests employment will be displaced elsewhere, and that growth in employment is not needed in the South East.
- 1.2.3 APCAG states that the project will be detrimental to both landscape and local ecology.
- 1.2.4 A lack of access to Gatwick from areas other than the South East is noted by APCAG, along with suggestions for improvements further afield, for example to the A29 and public transport across the county and throughout Sussex.
- 1.2.5 APCAG questions the sustainability of the airport, suggesting it will account for 5.5% of national emissions by 2038.
- 1.2.6 APCAG suggests consideration be given to the impacts of noise on communities up to 30 miles from the airport, suggesting that the noise envelope could be expanded.

1.3 Ansty and Staplefield Parish Council

- 1.3.1 The Parish Council opposes the Project, noting that Government policy does not support an additional runway at Gatwick.
- 1.3.2 Concerns are raised about the impact of the additional air traffic on the High Weald AONB and surrounding areas. The impact of additional traffic causing congestion on already crowded roads is also noted.

1.4 Battle Town Council

- 1.4.1 The Council strongly opposes the Project due to carbon emissions and air pollution associated

with aircraft, suggesting that the number of flights at Gatwick should be reduced rather than increased.

- 1.4.2 Concerns are raised about new workers moving into the area resulting in an increase in housing in the AONB or the displacement of local people who need housing they can afford.
- 1.4.3 The Council does not consider that the Project will increase the number of visitors to Battle, which relies on tourism, and suggests that it could instead be detrimental to the tranquillity of the area, increasing noise and air pollution.
- 1.4.4 The Council supports attempts to make a green environment but considers it would not compensate for the damage that will be done if the project goes ahead. It suggests monitoring for compliance with proposals for managing climate change and carbon and suggests that if the project does go ahead, a new wildlife habitat be developed. The Council objects to the temporary use of green space for the Project due to the time it would take to recover and suggests brownfield land should be improved with a 10% biodiversity net gain. It also suggests that the airport should continually strive to increase its recycling capability, regardless of whether the Project goes ahead.
- 1.4.5 The Council suggests that construction materials are the least polluting materials, recycled where possible and locally sourced. It also asks that ground surfaces can be permeable whenever possible.
- 1.4.6 The Council supports proposals for improving public transport, but notes that railway improvements are not within the control of the airport. It notes that coach services to the airport would need external hubs to which people could travel to connect with frequent, direct services to the airport, suggesting financial incentives to make public transport attractive. A plan for free/low-cost public transport for airport workers, including commuters from Battle, is also suggested.
- 1.4.7 The Council considers that local traffic should be improved should the Project go ahead, with particular consideration given to the needs of cyclists and pedestrians.
- 1.4.8 The Council requests that that consideration is given to the hours of work and to ways of keeping light and noise pollution to a minimum.
- 1.4.9 The Council appreciates the opportunity to take part in the consultation process, noting that the details provided about the Project were easily accessible.

1.5 Betchworth Parish Council

- 1.5.1 Betchworth Parish Council strongly opposes the northern runway proposals, questioning the need case, growth forecasts, and compliance with Government aviation policy. The Parish Council suggests Gatwick already has significant available capacity and that it will not use for many years and says that given the impact of the Covid-19 pandemic and increasing climate awareness, the need for even more capacity is questionable.
- 1.5.2 The Parish Council believes the scale of construction works being proposed demonstrates that the proposals should not be considered under the 2018 Making Best Use of Existing Runways policy. It argues instead that the plans involve wholesale rebuilding of large elements of the airport and its supporting infrastructure, and the current Emergency Runway is being rebuilt

effectively as a Second Runway. It believes the airport should not be permitted to grow unless it is able to reduce adverse environmental, noise and other impacts from any growth from a 2019 baseline.

- 1.5.3 The economic benefits are questioned, with the Parish Council suggesting that the predicted increase in local or regional jobs would be at the expense of jobs elsewhere in the UK. It states that the analysis is based on out-of-date data and includes errors or omissions and correcting these would have a significant effect on the overall benefit-cost for the project. It also points to the expectation that there would not be a material net job creation at the national level. The Parish Council believes that no account of the employment impacts on the UK tourism economy of increasing outbound tourist trips has been undertaken and increasing automation in the aviation sector should also be considered.
- 1.5.4 The Parish Council believes that increasing the dependence of the local economy on Gatwick is a risky strategy following the Covid-19 pandemic and calls for greater economic diversification.
- 1.5.5 The Council calls for a thorough assessment of where new housing for airport workers would be built, ensuring affordability, consideration of the impacts on the green belt and the provision of sustainable transport for staff to get to Gatwick airport.
- 1.5.6 The Council expresses concern about the predicted increase in CO2 emissions associated with the proposals, suggesting it is incompatible with net zero targets. It believes growth at Gatwick should be conditional on achieving a progressive, material reduction in the total climate impacts from a 2019 baseline, with independent monitoring and enforcement. It believes Gatwick's plans would make a material impact on the UK's ability to meet its carbon reduction targets. It seeks more detail about how aircraft emissions would be reduced and suggests that technological solutions, efficiency, sustainable fuels, electric or hydrogen aircraft and offsets do not currently offer a route to net zero emissions for the aviation industry. The council believes Gatwick should be required to develop plans that align with the latest WHO guidelines and address the risk from ultra-fine particles.
- 1.5.7 The Parish Council considers that the surface transport strategy should prioritise public transport as this would reduce the need for extra car parking and the size of the footprint of the proposals. It believes the surface access strategy presents contradictory aims with the expansion of highway and car parking capacity, while it is claimed that increasing use of sustainable transport is the priority. It believes the proposals will lead to an increase in car travel and vehicle movements for freight. The Parish Council suggests modelling public transport investment needed to accommodate all the increased journeys to and from the airport by passengers and workers and for it to fully fund the related increase in public transport provision.
- 1.5.8 The Parish Council expresses concern that there are no plans to reduce the number of vehicles using rural roads to access the airport, which currently have detrimental impacts on villages like Betchworth. It believes there should be no increase in passengers accessing the airport by road, similar to the commitment made by Heathrow in its expansion plans.
- 1.5.9 It believes plans to improve cycle facilities and pedestrian access for nearby staff are insufficient to significantly encourage a shift to active travel modes.
- 1.5.10 The Parish Council believes the northern runway proposals could exacerbate existing

infrastructure challenges in the area. It points to a significant number of commuting journeys in and out of nearby Crawley leading to daily congestion and high levels of air pollution on local roads through Betchworth.

- 1.5.11 The council expresses concern about the impact of additional passengers with luggage using already overcrowded trains on the London to Brighton Mainline and busy platforms at Gatwick Airport Station. Despite Gatwick saying its rail modelling shows that no significant crowding is expected, the council points out that this modelling assumes the delivery of rail improvements by Network Rail, to support the additional passengers that will use the airport.
- 1.5.12 The Parish Council believes the additional noise, air pollution, climate and local transport impacts of the proposed construction works (including of the proposed changes to surface access) must be fully modelled and mitigated. It notes the Gatwick's proposal Code of Construction Practice but states that the details will not be known until negotiated with the local authorities. The Council expresses concern about the adherence to approved routes for construction traffic and there being limited enforcement available. It believes that due to the shift patterns of construction work many workers will be unable to use public transport to get to the airport.
- 1.5.13 The Parish Council believes the noise proposals are not compliant with government policy requiring the benefits of future growth in aviation to be shared between the aviation industry and local communities.
- 1.5.14 It suggests the noise envelope proposals are based on inappropriate metrics and limits, do not comply with government policy, lack adequate enforcement arrangements and have been put forward without meaningful stakeholder discussion. It believes the monitoring of the noise envelope should be undertaken by an independent body. It expresses concern about the lack of details about enforcement if a breach occurs and fails to confirm which body will be responsible for taking any remedial action. It suggests setting up a noise envelope development group with stakeholders to work on alternative proposals.
- 1.5.15 Concerns are expressed about the noise mitigation measures and the Parish Council believes all residents local to the airport and living under flight paths should be compensated for loss of property value.
- 1.5.16 The Parish Council believes the proposals will have a negative effect on sensitive habitats near the airport and the tranquillity of the countryside in Surrey, Kent, and Sussex will be diminished by the presence of more planes overhead. It expresses concern that the airport's bright lights operating 24 hours a day will reduce the pleasure of stargazing in areas where the night sky remains sufficiently dark.
- 1.5.17 The Parish Council insists that all flood mitigation measures should be implemented before any construction works that expand areas of hardstanding, to prevent any short-term increase in flood risk.
- 1.5.18 The Parish Council considers the following conditions should be attached, before any approval of Gatwick's DCO submission:
- A total ban on night flights for a full eight hours.
 - A noise envelope agreed by local communities.

- Noise should reduce from 2019 levels as capacity grows and the benefits are shared with local communities.
- Areas like Betchworth, which fall outside the noise envelope, but have frequent overflights, should be considered and mitigated.
- the airspace modernisation programme should remain 'scoped in' to the northern runway process.
- There should be progressive and material reduction in the emissions and total climate impacts attributable to the airport, inclusive of emissions from surface transport and full flight impacts, from a 2019 baseline.
- A legally binding commitment that there would be no further runway, terminal or associated development at Gatwick including no full new runway, including disposal of the land currently set aside for a new runway.
- Finally, no increase in road traffic to the airport, combined with a requirement progressively to reduce the absolute number of passengers, staff and other users accessing the airport by road.

1.5.19 The Parish Council believes the Project should be rejected on the grounds of inadequate consultation. It suggests that community groups and councils have not been adequately engaged and claims that questions posed in engagement meetings have not been answered promptly, not all requested engagement meetings have been arranged and there was no opportunity for face-to-face meetings. The Parish Council believes that the level of support from Gatwick for local councils to properly respond to the public consultation given its size and complexity, was inadequate.

1.6 Bidborough Parish Council

1.6.1 Bidborough Parish Council strongly opposes the northern runway proposals and believes that Gatwick has not put forward a credible needs case for the expansion. It says the public consultation material acknowledges that the airport already has substantial surplus passenger and air traffic movement capacity, above 2019 levels.

1.6.2 The Parish Council states that historic growth in capacity to current levels has taken many years and there is no need for the northern runway proposals. The Parish Council suggests that Gatwick is unlikely to utilise its existing surplus passenger capacity until the 2050s and its existing Air Traffic Movements (ATM) capacity until the 2040s at the earliest. It also believes the impacts of the pandemic and increasing climate awareness on air travel need to be considered in the growth forecasts. The Parish Council believes that taking these issues into consideration, it is very likely that there will never be a need for additional capacity at Gatwick Airport, particularly with the third runway at Heathrow.

1.6.3 The Parish Council believes the predicted employment benefits are misleading and highlight that the Project is not expected to result in material net job creation at the national level. It believes local or regional job creation would be at the expense of other regions and argues that the assessment of the economic benefits and costs is based on unsupportable or out-of-date assumptions. It suggests that if omissions and errors are corrected, it would likely mean the

scheme has a negative net present value. The Parish Council says it submitted a report to the public consultation by an independent consultant with further research in this area.

- 1.6.4 Concern is expressed that the proposals do not limit development within Gatwick's current perimeter. The Parish Council states that it does not support additional land-take either for construction purposes or long-term use. It suggests instead that a public transport led surface transport strategy would negate the need for much of the footprint expansion proposed.
- 1.6.5 The Parish Council calls for all flood mitigation measures to be fully implemented prior to construction works that extend the areas of hardstanding, such that there is also no short-term increase in flood risk.
- 1.6.6 The Parish Council believes the strategy for surface access is contradictory as it says it will aim to increase use of public transport by passengers and staff but also proposes to increase highway capacity and car parking. It believes this will result in a steady and substantial increase in car travel to the airport and numbers of new car parking spaces proposed supports this. The Council believes there should be no increase in the number of passengers accessing the airport by car and that Gatwick should be required to reduce the absolute number of passengers using cars and the number of highway trips as a condition of any expansion.
- 1.6.7 The Parish Council suggests that aside from some proposals to support a limited number of bus routes serving the airport and provision of additional infrastructure to transport passengers from rail platforms into the airport, Gatwick is relying on already committed rail enhancements to support the additional passengers that will use the airport.
- 1.6.8 The Parish Council believes sustainable travel options must be both more convenient and better incentivised financially, to be successful.
- 1.6.9 The Parish Council believes the area around Gatwick is already experiencing the effects of a mismatch between growth and the ability of the transport and other infrastructure to cope. It states this is reflected in significant numbers of commuting journeys out of Crawley and heavy congestion on local rural roads and concern is expressed that the northern runway will continue to exacerbate these issues.
- 1.6.10 Concern is expressed about the additional noise, air pollution, climate and local transport impacts of the proposed construction works. The Council believes these impacts must be modelled and mitigated so that there is no short-term increase in air pollution, traffic congestion or noise.
- 1.6.11 The Parish Council notes plans to produce a Code of Construction Practice for the construction phase, and that this will provide restrictions and approved routes for construction road traffic. Concern is expressed that the routes will not be properly enforced to avoid significant HGV traffic using unsuitable local roads. It states that the details of the code will need to be negotiated with the local authorities.
- 1.6.12 It suggests that construction workers should be encouraged to use the public transport system but are concerned that due to shift patterns many will choose to drive to the airport.
- 1.6.13 The Parish Council believes the proposals would have substantial noise consequences for local communities and are inconsistent with the government's aircraft noise policies because this requires the industry to reduce and mitigate noise as airport capacity grows. The Parish Council

expresses concern that there would be no benefits shared with local communities which is required by government policy.

- 1.6.14 The Parish Council believes the noise envelope should contain absolute passenger and ATM caps and limits on the frequency of noise events above specific sound levels using N above metrics and Leq limits. It believes the limits should be set at levels that achieve the sharing of benefits and that a noise envelope development group, including all stakeholders, should be set up to develop alternative proposals.
- 1.6.15 The Parish Council believes the scale of the construction works suggests the scheme is not suitable to be considered under the Making Best Use of Existing Runway police, as it involves wholesale rebuilding of large elements of the airport and its supporting infrastructure.
- 1.6.16 It believes that granting of consent for the northern runway should be conditional on some additional measures including:
- A ban on all night flights for a full eight-hour period every night.
 - A noise envelope agreed with local communities and that reduces noise and mitigates as capacity grows and the benefits of growth are shared.
 - Noise, measured on an agreed basis and using a range of metrics, must fall from the actual levels in 2019 and the projected levels in 2029, prior to the start of dual runway operations.
 - A progressive and material reduction in the emissions and total climate impacts attributable to the airport from a 2019 baseline. A reduction trajectory should be set, independently monitored and enforced.
 - A legally binding commitment that there would be no further runway, terminal or associated development at Gatwick including no full new runway.
 - No increase in road traffic to the airport, combined with a requirement progressively to reduce the absolute number of passengers, staff and other users accessing the airport by road.
- 1.6.17 The Parish Council expresses concern about the public consultation, and believes it is not based on accurate information to give consultees a clear view of what is proposed as required by the Planning Act 2008. It suggests on this basis, the proposals should be rejected. In addition, it suggests that local communities or councils were not properly engaged and questions unanswered. It expresses disappointment that there were no face-to-face meetings and believes the level of support for local councils to properly respond was inadequate.

1.7 Brockham Parish Council

- 1.7.1 Brockham Parish Council opposes the routine use of the northern runway due to concerns about its environmental and local impacts. It believes the increased aircraft and passenger movements resulting from the runway would contradict efforts to reduce the environmental impact of human activity.
- 1.7.2 The Parish Council believes another runway is not needed and expresses concern about increased noise and air pollution - particularly increased use of Departure Route Four, which

passes close to Brockham; traffic congestion on local roads; housing requirements changing the rural nature of the village; climate change impact; environmental consequences for open spaces and local wildlife and ecology; and diversion of the River Mole and increased risk of flooding to the village.

- 1.7.3 The Parish Council notes that Gatwick provides a significant number of job opportunities over a range of skill levels both on site and in the local area. However, it argues that the northern runway will require the influx of large numbers of workers and their families, which will add pressures on housing and public amenities. It suggests that in the spirit of levelling up, these employment opportunities would be better being distributed more evenly throughout the UK.
- 1.7.4 It questions the assessment of the economic benefits and costs of the proposals as they appear to be based on unsupportable assumptions, omissions and errors. The council believes that there must be a balance between business and economy, including quality of life and a sustainable environment. It believes that the northern runway will bring more businesses to the area but also more congestion and pollution, loss of green space and more stress for local residents.
- 1.7.5 The Parish Council believes both relocation options for the CARE facility are unacceptable due to its opposition to the northern runway proposals. However, it says that the relocation of the CARE facility within the airport is best determined by Gatwick management.
- 1.7.6 The Parish Council expresses concerns about plans to redirect the River Mole and the potential effects for flooding in the village. It highlights the requirements of the Environment Bill for a development to have an overall positive impact on biodiversity and says it is not clear how the expansion of Gatwick can have a positive impact.
- 1.7.7 The Parish Council believes the plans for traffic and transport would result in increased congestion and higher pollution due to increased vehicle use. It expresses concern about increased traffic flow and speeding through Brockham village. It believes there should be no increase in the number of passengers driving to the airport and Gatwick should provide sufficient public transport capacity to accommodate the additional demand.
- 1.7.8 The Parish Council notes the road improvements are restricted to the area adjacent to the airport. It believes that traffic flow will increase in the villages of Surrey and Sussex and the road improvements would only mean that traffic numbers increase until a critical mass of traffic is reached. Concern is expressed about the reduced capacity while highway improvements works are undertaken and the impact on local roads, including through Brockham.
- 1.7.9 The Parish Council believes Gatwick's transport plans are contradictory because of the significant additional car parking places proposed.
- 1.7.10 It believes the additional noise, air pollution, climate and local transport impacts of the proposed construction works must be fully modelled and mitigated such that there is no short-term increase in air pollution, traffic congestion or noise around the airport. It expresses concern that there is no rail interchange for construction material, resulting in more HGVs on local roads. It says the carbon impact of construction should be fully accounted for within a carbon budget for Gatwick that reduces year on year in line with overall government carbon budgets.
- 1.7.11 As part of the proposals, the Council believes that Gatwick should sign a binding agreement to

stop flying whenever the pollution levels are greater than they are now in 2021.

- 1.7.12 The Parish Council questions the effectiveness of the noise envelope proposals, including the availability of the technology suggested. It believes the noise envelope could impact residents in Brockham village and expresses concern that the proposed noise mitigation measures will not help residents in the southern part of Brockham village.
- 1.7.13 The Parish Council calls for Gatwick to ensure all stakeholders are involved in each part of the consultation process.

1.8 Burstow Parish Council

- 1.8.1 Burstow Parish Council says the majority of parish residents live in the village of Smallfield which lies north of the approach to the current main runway, so the number of people affected by arriving and departing aircraft is limited.
- 1.8.2 The Parish Council expresses concern that use of the northern runway will mean at peak times there will be departures of aircraft every minute. It is for this reason that the council says it tends to oppose the northern runway proposals. It argues that there is still existing capacity available for Gatwick to grow using the main runway. It suggests that in isolation, the northern runway proposals, particularly plans close to the airport, have been very well thought through.
- 1.8.3 The Parish Council says that Gatwick is a very important local and regional employer and supports STEM with apprenticeships and suggests there should be an expansion of the schemes it sponsors. It also says that while Gatwick plays a vital role in supporting businesses around Crawley, it is also important for the area to rethink its dependency on the economic success of the airport.
- 1.8.4 Concern is expressed about the implications for local housing and roads from a significant increase in new employees, many of whom will be skilled. The Parish Council says it hopes the economic case will be recognised and some investment in these areas will be forthcoming if the northern runway is given the green light.
- 1.8.5 The Parish Council expresses concern about the likely increase in traffic on local roads, particularly given the proposed significant increase in car parking spaces. It suggests that both the M23 and M25 are already struggling to cope with current traffic levels and the Project would result in local A roads and rural roads being used even more than they are now. It believes it is difficult to argue that Gatwick should help to fund wider road improvements as there are other demands on road infrastructure such as building many new houses within a five-to-ten-mile radius.
- 1.8.6 The Parish Council believes the northern runway proposals have a good business case, but Gatwick is unable to address periphery issues which affect its business such as limited rail and road infrastructure.
- 1.8.7 The Parish Council says the CARE facility position is not particularly relevant to its parish but understands that its position could be critical to Charlwood. It expresses a preference for the location of CARE Option 2.
- 1.8.8 The Parish Council believes the dedicated Gatwick Express service has deteriorated in recent

years due to capacity issues on the mainline from London. It says it understands that upgrading the rail network at the Windmill Junction just north of Croydon railway station will be an important step forward if it is given the 'green light' in time for the northern runway proposals. It says that Gatwick needs to work closely with the rail authorities to ensure this goes ahead. It also argues that improved rail links should be made cross country from Redhill to Reading and Redhill to Tonbridge and beyond to encourage more public transport use.

- 1.8.9 Whilst construction noise and dust is unlikely to affect Burstow Parish, the Council says it understands that this could cause significant concern for many who live close to the contractors' site. It says there will be a significant amount of both heavy and light traffic that will be accessing the Horley boundary throughout the adopted working periods that will need to be included in the EIA. It expresses interest in how best practice proposals will be developed in the EIA plan.
- 1.8.10 The Parish Council suggests that there will be a marked increase in HGV traffic through Horley and Horsham, as not all lorries will be able to access the airport from the M23. It states that the EIA must take into consideration that many C class roads are hardly more than country lanes used by other traffic like tractors, cyclists and horse riders. It says that Burstow and surrounding villages already experience significant levels of lorry traffic.
- 1.8.11 It believes Gatwick should be applauded for the significant achievements of becoming a carbon neutral London airport and using 100% renewable energy. It believes Gatwick's plans for mitigating and managing its impact on climate change are plausible but questions whether they are realistic.
- 1.8.12 The Parish Council believes that in recent years the number of flights have increased but noise has decreased due to new aircraft technology improving airframe and engine design. It says the design of the noise envelope is extremely important for it to be effective. It states that the N above metric should be adopted in addition to the LAeq metric as a desired level of noise measurement. It suggests that otherwise, the increased number of ATMs are likely to reach or exceed Significant Observed Adverse Effect Level (SOAEL) where the level of annoyance would be increasing. It suggests that more work may be necessary to ensure that the noise envelope achieves its purpose as it can only have been modelled at this stage.
- 1.8.13 The Parish Council says that it would be interesting to know what the penalties are likely to be if Gatwick cannot operate within the noise envelope. It says that unless there is certainty in the model, it won't provide the certainty to residents that air noise levels will be lower in the future.
- 1.8.14 It notes that Gatwick has identified historic buildings to the west of the airport and the impact that the proposals might have on them which will be included within the Environment Impact Assessment (EIA) but says there is one omission from Burstow: the Parish Church is a 12th Century, Grade 1 Listed building and is within 5 km of the airport and under the ILS approach. It says that whilst the northern runway will be 210 metres further north, the church will still be impacted by departing aircraft so the EIA should certainly include this building. The Parish Council asks whether Gatwick has investigated whether there may be other listed buildings on the eastern side of the airport which should be included in the EIA.
- 1.8.15 The Parish Council welcomes the two stage noise contours being used to establish the level of noise insulation that will be available for the affected residents.

- 1.8.16 The Parish Council believes the public consultation process has been approached in a sensible way, with plenty of evidence and information being provided by Gatwick. It expressed disappointment that the parish was not included in the roving exhibitions considering that the Planning Inspectorate approached the parish council for their comments at the pre-DCO stage.

1.9 Charlwood Parish Council

- 1.9.1 Charlwood Parish Council considers the Project will have a significant impact on the parish and notes it shares the longest boundary with the airport. It highlights the impacts it is most concerned about, including increased numbers of flights; increased number of HGV vehicles coming through the parish during construction; increased numbers of vehicles taking passengers to and from the airport; increased ground and air noise; increased emissions of carbon and other harmful substances; increased mental health impacts; and, increased disruption to sleep patterns. It says it will want to make its views known about Gatwick's plans at a public hearing.
- 1.9.2 Concern is expressed about the substantial increase in car use and the burden it will place on the local road network and communities. It says the road network is already struggling to cope and every time there is a hold-up on the M25/M23 passengers will use local roads as an alternative to access the airport. It believes that as the major roads become more congested, more airport traffic will be diverted through Charlwood and Hookwood. The Parish Council also expresses concern about LGV and HGV vehicles accessing the airport during the construction phase, due to increasing freight air travel and to service bigger day-to-day airport operations.
- 1.9.3 The Parish Council believes the traffic and transport proposals are inadequate and says there should be no increase in the number of passengers accessing the airport by road. It questions the inclusion of electric vehicles as a sustainable transport mode as they have no impact on reducing congestion.
- 1.9.4 The Parish Council argues that additional hardstanding, for instance to accommodate all the extra car park spaces, will add to a greater risk of flooding particularly for those living downstream near the River Mole. It says proper consultation is needed with local authorities as to when Gatwick should release water from their pools into the Mole. It calls for the modelling of flooding risk to be a factor in the consequences of climate change and all flood mitigation measures should be fully implemented before the start of the work on infrastructure and extending the hardstanding areas so there is no additional risk of flooding in the short term.
- 1.9.5 The Parish Council calls for sufficient public transport provision to accommodate the additional demand created by the northern runway and suggests that Gatwick be required to reduce the absolute number of passengers, staff and other users using road transport as a condition of any expansion. It expresses disappointment about the current proposals for investment in public transport, which it says amounts to working with local bus operators to support a limited number of bus routes serving the airport and additional infrastructure to transport passengers from rail platforms into the airport. It believes that Gatwick is relying on already committed rail enhancements to support the additional passengers that will use the airport, while the impact of non-Gatwick passengers is not considered. The Council also notes that having no rail network running from east to west, exacerbates road use from the west through Charlwood parish.

- 1.9.6 The Parish Council calls for evidence to be provided to support the PEIR statement that night-time traffic flows are unlikely to have a significant effect and says suitable modelling/sensitivity analysis should be carried out.
- 1.9.7 The Parish Council notes the production of the Code of Construction Practice but says details will not be known until negotiated with the local authorities. It expresses concern that restrictions and approved routes for construction traffic may not be adhered to and that there are limited enforcement processes available. It also raises concerns about the length of the construction period and its potential effects on residents.
- 1.9.8 It expresses concern that construction workers, due to the nature of their shifts, will use their own cars rather than public transport. The Parish Council says that public transport provision for airport workers must reflect their shift working patterns and the locations of anticipated homes for airport workers.
- 1.9.9 It believes that whilst the cycling improvements are useful, they will only benefit a small number of people.
- 1.9.10 The Council highlights that Charlwood and Hookwood suffer from pollution from incoming and outgoing flights – Charlwood when the wind is coming from a south easterly direction; Hookwood when the wind is from the south - and points to the strengthening of WHO guidelines for limiting air pollution for NO₂ and PM_{2.5}. It believes this is significant given that NO₂ at sites around the airport are currently above the revised level and there are no changes in levels forecast at the airport. It also expresses concern that there are currently no levels set for the measurement of Ultra Fine Particles.
- 1.9.11 The Parish Council expresses concern at the predicted increase in carbon emissions and suggests that this seems to contradict the government's net zero commitments. It believes the northern runway proposals should not go ahead unless it can do so without adverse environmental impacts. It believes all impacts should be measured from a 2019 baseline, so the cumulative effects of growth are properly assessed. It also expresses concern about the increase in road traffic that will directly affect air quality in the parish.
- 1.9.12 It believes the mitigation measures proposed by Gatwick are inadequate and asks why there are no measures being offered like rate relief, a ban on night time flights and insulation improvements.
- 1.9.13 The Parish Council highlights air, ground and road traffic noise as the noise impacts most affecting the parish. It expresses concern that construction noise and vibration will be added to these, including the use of construction compounds, if the Project goes ahead.
- 1.9.14 The Parish Council believes noise impacts are far greater in a rural community like Charlwood than experienced in urban communities such as around Heathrow, as the ambient noise is lower.
- 1.9.15 It believes the noise envelope plans are inconsistent with CAA guidelines and propose inappropriate metrics and limits, do not comply with government policy, lack adequate enforcement and have been presented without stakeholder discussion, in contrast to the approach taken by other airports.
- 1.9.16 It believes the predictions that there would be less impact from aircraft noise in the future than in

2019 are incorrect and rely on uncertain fleet replacement assumptions. Concern is expressed that residents of 40 Charlwood properties at the western end of the runway will experience noise levels worse than predicted. The Parish Council notes Mole Valley District Council's comments that justification should be provided in the Environmental Statement as to why this is not classed as a 'Major' adverse effect. It also calls for greater efforts to share technology benefits to mitigate these impacts.

- 1.9.17 The Parish Council calls for a design group to be set-up, with stakeholders, to test different options for the noise envelope and says Gatwick needs to address the issues of independent scrutiny and enforcement of the noise envelope.
- 1.9.18 The Parish Council notes the potential impacts of night-time construction noise on 14 properties in Charlwood and 13 in Hookwood and calls for Gatwick to provide more details in the Environmental Statement about the process by which residents' needs will be assessed and the level of disturbance to the residents and their properties.
- 1.9.19 The Parish Council believes communities around Gatwick are unfairly penalised by the current operations with many more night-flights than Stansted or Heathrow. It believes ground noise is much greater than during the day and additional road traffic noise is caused by passengers and employees driving through Charlwood and Hookwood. It states that disturbance is also caused by employees leaving for work or passengers going to the airport very early. Parking by passengers or taxis on local roads is also disruptive.
- 1.9.20 It believes the combined and cumulative effects on the health of the population of Hookwood and Charlwood, should be assessed. It states that both these communities will be exposed to more noise disturbance and poorer air quality arising from construction and the operation of the northern runway. It believes local health impact assessments to consider noise, air quality and potential lighting impacts, and combined and cumulative effects should be undertaken. It believes these assessments should inform compensation and mitigation packages for the residents.
- 1.9.21 It also expresses concern about the impact on property values from more overflying and noise disturbance from construction and says this should be scoped in and inform compensation packages
- 1.9.22 The Parish Council expresses surprise that during the public consultation Charlwood and Hookwood, had not been included initially as a location for either a Mobile Project Office or a Deposit Point – two important elements in making householders aware of what is planned. It states that the Parish Council had to request for these facilities to be provided. It believes the Mobile Project Office proved to be unsuitable for explaining Gatwick's complex plans when compared to a public exhibition and says people were only able to organise a call-back with a technical expert, not speak with one directly. It expressed disappointment that Gatwick did not meet parishioners face-to-face to answer questions and address their concerns. It states that the briefing organised via Zoom for Councillors only was over in an hour and was less than satisfactory. The Parish Council believes it was crucial for the nearest residents to Gatwick to be given the opportunity to put questions directly to the management team.
- 1.9.23 The Parish Council expressed concern at the lack of financial support available for affected local authorities and communities. It believes that should permission be granted for the northern

runway proposals, a number of conditions should be introduced, including:

- A legal commitment by Gatwick that there would be no night flights on the northern runway.
- There should be no night flights on the main runway.
- No flights over Charlwood even by small aircraft.
- No increased use of the Povey Cross entrance to the Airport.
- No use of the new runway or round the end taxiways until the bunds have been completed.
- That all the land at Brook Farm should be planted with trees, including evergreen trees and a legal agreement should be imposed to prevent any other use of this land for commercial purposes.
- Implementation of a link from the Sussex Border Path to the Museum Field area with inclusion of new access points to Charlwood should be included in a legal agreement.
- No construction work vehicles to be allowed to travel through the parish.
- All spoil that results from construction work to stay on site and used for bunding purposes.
- Proper noise mitigation for households.
- Legally binding commitment for no further runway or associated development at Gatwick.
- The provision of a proper public transportation system for the parish (with proper consultation and realistic timetables).
- The creation of a special community fund in recognition that Charlwood and Hookwood experience significant impacts from the airport.
- Investment in culverts and drainage in the parish to minimise the risk of flooding.
- Construction of footpaths linking Hookwood with Charlwood.
- Other tree-planting and environmental schemes.

1.10 Chichester District Council

- 1.10.1 Chichester District Council strongly opposes the proposals. It believes the economic benefits of the project do not outweigh its environmental costs and the case for expansion has not been made. The Council says it would reconsider its opposition if green technology replaces aviation fuel.
- 1.10.2 In relation to employment, the Council suggests that the number of jobs per passenger has been falling consistently due to automation and that the employment impacts on UK tourism and economy of increasing outbound tourist trips have not been taken into account. The District Council also expresses concern about summer seasonal work and believes this could create additional pressure on local housing and lead to more commuting, causing congestion and pollution. It calls for investment in green industries that would make a positive contribution to the area.
- 1.10.3 The District Council says the approach to land use appears to be sensible but believes that more cycle lanes and cycle parking and greater investment in public transport is needed. It suggests a staff travel plan is required and must consider staff shift work patterns so workers are dissuaded from driving to work. Concern is expressed about how a sustainable modal shift will be achieved, with the Council highlighting the challenges of already near capacity rail services and local roads.

- 1.10.4 The District Council believes the proposed improvements to the road junctions near to the airport shouldn't be made without proper consideration of how to improve walking and cycling links to and from the airport.
- 1.10.5 Concern is expressed about the potential impact of the predicted increase in cargo movements at the airport on the Strategic Road Network that by-passes Chichester.
- 1.10.6 The Council supports the proposals to mitigate construction impacts but suggests greater consideration needs to be taken to reduce, reuse and recycle waste. It also supports proposals to manage construction transport and suggests wheel scrubbers are used to prevent soil spill onto nearby access and exit points.
- 1.10.7 The District Council says that emissions and their effects on climate change can not be mitigated and will have a material impact on the UK's ability to meet its carbon reduction targets. It believes carbon-offsetting should only be used when other options are exhausted and suggests the focus should be on improvements in aircraft technology and maximising public transport journeys to and from the airport. The Council also suggests that the carbon implications of the project need to be properly calculated.
- 1.10.8 The District Council suggests the analysis of potential noise impacts are inappropriate and unclear and believes the claim that there will be less impact from more aircraft does not appear credible. The concept of the noise envelope is welcomed, but the Council suggests the proposals are inconsistent with CAA guidance. It expresses concern that the metric and limits are inappropriate and have been developed without the stakeholder discussion required by the CAA.

1.11 Chiddingstone Parish Council

- 1.11.1 Chiddingstone Parish Council strongly opposes the northern runway proposals. It expresses concern about the environmental impact and says the predicted increase in emissions is not consistent with government policy and will impact the UK's ability to meet its carbon reductions targets.
- 1.11.2 The Parish Council argues that a credible need case has not been presented, suggesting there will be a substantial surplus in terms of passengers and air traffic movements for many years, and Gatwick's historic rate of growth does not warrant these proposals. The Council believes that due to increasing climate change awareness, it is likely that air traffic will reduce for both business and leisure in the coming years.
- 1.11.3 The Council notes that the parish - and much of Kent and Sussex - is under the flight path into and out of Gatwick. It expresses concern that the increase in aircraft movements and passenger numbers would increase noise disturbance to an unacceptable level, impacting on physical and mental health.
- 1.11.4 The Parish Council does not consider the proposals will provide any economic benefits to its parishioners and suggests there will be many more negative impacts on the community.
- 1.11.5 The proposals to offset the environmental impact of the Project are considered to be insufficient, with the Council suggesting no additional land should be used, even temporarily, as the impacts will be irreversible.

- 1.11.6 The Parish Council considers that the Project will lead to more traffic and congestion around the airport and requests a commitment to no increases in road traffic movement because of the Project. It believes the proposed sustainable transport targets are inadequate and will lead to a steady and substantial increase in car travel to the airport. The Council also expresses concern about traffic and disruption during construction.
- 1.11.7 The noise envelope proposals are not considered to go far enough to protect communities under the flight path, with the Council also stating they are inconsistent with CAA guidance. It suggests that an acceptable noise envelope must incorporate average noise contours and noise event frequency at different decibel levels.
- 1.11.8 The Parish Council believes there will be no benefit for people who live under the flight path but outside Gatwick's noise envelope, calling for it to be extended to Chiddingstone Parish. Concern is also expressed about night noise, with the Council suggesting a ban on night flights.
- 1.11.9 The Council does not consider that engagement has been sufficient. It also suggests that many people found the long consultation document confusing.

1.12 Cowden Parish Council

- 1.12.1 Cowden Parish Council is strongly opposed to the Project and believes Gatwick has yet to reach capacity, meaning there is little justification for the proposals especially as government policy supports an additional runway at Heathrow.
- 1.12.2 The Parish Council raises concerns about the lack of an emergency runway during the construction period, the increase in air traffic, noise nuisance and air pollution under the approach and departure flight paths. The Parish Council also notes the potential impact on the quality of life for residents.
- 1.12.3 The Parish Council acknowledges that construction would provide short term additional work but once operational, it argues that the direct employment benefits are overstated and says technology is reducing the number of staff required at airports. It does not believe that increased air traffic will benefit many local businesses in the longer term, particularly when considered against the potential negative impacts such as congestion and delays on already overcrowded roads.
- 1.12.4 The Parish Council believes the proposals for airport supporting facilities inappropriate and that the northern runway should be considered a new runway because it will be completely rebuilt.
- 1.12.5 Concern is expressed about potential effects on the landscape and ecology, and the reduction in public green space in areas around the airport. The Parish Council suggests where land is used temporarily, areas should be enhanced when they are returned to their previous use.
- 1.12.6 The Parish Council is concerned about traffic congestion on roads that feed the area and suggests Gatwick is an unsuitable location for expansion due to its limited road and rail links. It suggests the proposed local improvements to cycling and walking will only benefit a very small number of people and workers travelling to Gatwick. Concern is expressed that the public transport system is close to capacity and significant investment is needed to improve infrastructure.

- 1.12.7 There is concern that the impact of the construction on local communities and airport users has been understated and that mitigation measures are limited. The Parish Council believes that the construction traffic management proposals are not realistic and will add to traffic and congestion.
- 1.12.8 The Parish Council expresses concern about the carbon impacts of construction and also states that whilst the airport may become carbon neutral in future, airport operations will not. It believes overall air travel should be reduced and plans to tackle the carbon emissions from the airport will be insignificant in comparison with the predicted increase due to more aircraft movements.
- 1.12.9 Concern is expressed about the noise envelope proposals, particularly about how the base level will be determined and whether it will be tightened in future. Noise from overflying aircraft is raised as a particular concern.
- 1.12.10 The Parish Council believes local ambient noise is not appropriately considered and should be monitored by an independent body. It adds that the noise measurement threshold at Cowden was changed recently resulting in significantly fewer aircraft triggering the noise threshold at the Cowden Monitoring station. The Parish Council believes the various noise mitigation policies seem to have little effect for the majority of people.
- 1.12.11 The Parish Council believes the consultation document fails to take into consideration or fully address key issues, including:
- The effects of noise, pollution and congestions on the surrounding countryside beyond the immediate area of Gatwick.
 - The impact on property prices and the ability to sell.
 - Local residents who are suffering poor mental health and quality of life from aircraft noise in otherwise quiet rural areas.

1.13 Cranleigh Parish Council

- 1.13.1 The Parish Council states that residents who live on the south-eastern edge of Cranleigh are most affected by aircraft noise. While the Council agrees it is likely new aircraft will be quieter, it does not believe that there will be less impact from aircraft in the future than in 2019.
- 1.13.2 The Parish Council doubts that the project would generate more jobs and many billions in economic value, noting that there will be no material net job creation at a national level.
- 1.13.3 Concern is expressed about the impact of the Project on climate change. The Parish Council believes that in addition to CO₂ emissions, planes affect the concentration of other gases, produce water vapour trails and pollutants which could trap heat in the atmosphere, and contribute further to global warming. The Council points to several research papers and articles in this area to support its argument.

1.14 Crawley Borough Council

- 1.14.1 Crawley Borough Council strongly opposes the Project, saying it does not consider there is sufficient evidence to justify it. The Council recognises that the Project could deliver significant economic benefits to the borough, but believes they need to be weighed against the environmental and social impacts as well as global climate change.

- 1.14.2 The Council expresses concern about evidence and information gaps in the need case and recommends further work be undertaken to ensure assessment is robust.
- 1.14.3 The Council believes the fleet mix assumed in the Central Case for assessment is optimistic, particularly in the early years given the deferral of aircraft orders that has occurred during the Covid-19 pandemic. It also suggests there is little explanation about the basis for projections of future growth.
- 1.14.4 The Council is pleased that the proposals are mainly within the existing footprint of the airport boundary but suggests the layout could be too complex and inefficient, leading to increased delays. It believes justification is needed for the development proposals, particularly the new car parking. It asks for more details on height, scale, design, lighting, and location options for all facilities including the Care Facility, the car parks, especially in Pentagon Field, boundary treatments, and the highway improvements.
- 1.14.5 The Council calls for Gatwick to state that it no longer needs the land safeguarded for a potential future runway. It believes this would allow Crawley Borough to identify new employment land to accommodate economic growth associated with the northern runway.
- 1.14.6 The Council believes Gatwick should be taking account of the type and quality of employment being generated and how this translates into the need for different types of housing in the local study area, particularly in Crawley Borough. It suggests that many of the jobs directly linked to the northern runway appear to be lower paid/entry level and this would mean additional demand for affordable housing over and above the levels in the local plans of the councils. It calls for further work to analyse housing demand.
- 1.14.7 Concern is expressed that demand for construction workers will displace many from other local housing schemes. The Council suggests an assessment be undertaken of community facilities and services that would be used by new workers at the airport.
- 1.14.8 The Council considers the project offers a significant opportunity to enhance the footpath network to the east/southeast of the airport and would also welcome further discussion about more direct active travel links from Gatwick Station to the proposed Gatwick Green development.
- 1.14.9 The Council objects to the loss of Pentagon field and its use as a soil deposition area. It believes it will have a negative impact on the nearby countryside. It also requests broader survey areas for ecology, more detailed consideration of air quality impacts and more extensive mitigation, compensation and enhancement measures in order to achieve at least 10% biodiversity net gain.
- 1.14.10 The Council expresses concern at the potential for negative impacts on above ground heritage assets and calls for further work to be undertaken. It also believes assessment is needed of the heritage/archaeological significance of the land beneath the airport and recommends an Historic Area Appraisal of the airport itself.
- 1.14.11 The Council requests more detail on the height, scale, design, lighting, and location options for all facilities including the CARE facility, the car parks especially in Pentagon Field, boundary treatments, and the highway improvements. Concern is expressed about the lack of clarity in the description and visual effects of the development, and about the lack of information on the lighting strategy. The Council says it would welcome further discussions to agree on the viewpoints and

visual assessments.

- 1.14.12 The Council believes the Project should be used as an opportunity to improve the landscape and visual impact of the airport and suggests the current approach of relying on tree planting to eventually screen the works is not ambitious enough.
- 1.14.13 The Council says it accepts that ultrafine particulate concentrations are unquantifiable at this stage but would welcome further discussion of the likely health impacts in the Environmental Statement as well as a commitment to funding the purchase and operation of ultrafine particulate monitoring equipment for the duration of the Project.
- 1.14.14 More ambitious water efficiency measures are called for, including retrofitting of existing buildings, given the serious water stress in the southeast. The Council believes the proposals should not affect the expansion of Crawley wastewater treatment plant.
- 1.14.15 The Council expresses concern about the uncertainties of the transport modelling, particularly that Network Rail and National Highway schemes are included in the future baseline assessments but are not yet fully funded. Concern is also expressed about traffic and transport impacts of the Project on other proposed local developments close to Gatwick, including Gatwick Green, Horley Business Park and the West of Crawley development.
- 1.14.16 The Council welcomes the mode share targets but believes further improvements are needed to Gatwick Station, surface transport (including local and long-distance bus and coach services), and walking and cycling links.
- 1.14.17 Concern is expressed that, despite significant passenger growth, there will be minimal improvements to the road highway network beyond the airport. The Council calls for Gatwick to support the development of the Crawley Western Link Road, which would include priority for buses and dedicated cycling and walking lanes, enabling passengers and staff to access the airport sustainably. It also believes more detail is needed in the documentation about the North Terminal junction improvements and Longbridge roundabout.
- 1.14.18 The Council believes a detailed parking strategy needs to be developed and consulted upon, justifying the proposed additional parking provision. It requests that options for new parking within the airport boundary should be assessed before any off-airport locations are proposed.
- 1.14.19 The Council believes all types of greenhouse gases that would be emitted by the Project should be assessed. It suggests environmental cost calculations should be reviewed to ensure the most up to date carbon values are used and says it is not clear that any account has been taken of the cost of carbon and future abatement measures in Gatwick's growth forecasts.
- 1.14.20 The Council suggests that not all evidence relating to air quality impacts was included in the PEIR and requests that the information and data files that underpin the assessment are included in the Environmental Statement along with assessment of ultrafine particles. It also requests detailed quantitative assessments for each year of the health impacts from pollution associated with the proposals, calling for greater commitment towards mitigation and enhancement measures for air quality to reflect the increase in airport emissions associated with the proposals.
- 1.14.21 The Council welcomes the proposed construction mitigation measures and asks for an absolute commitment to monitoring dust levels throughout the Project. It notes that any routes for

construction traffic will need to be agreed with the council to minimise the impact on Crawley's Air Quality Management Areas and the local road network. It requests further details of construction techniques, mitigation, and revised limits as well as information about the impact in short, medium and long term on receptors for all noise expressed cumulatively.

- 1.14.22 The Council asks for further evidence to support Gatwick's underlying air noise predictions and calls for further work to be done for the Environmental Statement, including clarification of noise modelling and further scenario testing. The Council calls for northern runway use to be limited to between 7am and 11pm and for use by class three aircraft during the day.
- 1.14.23 The Council welcomes the use of the more sensitive N60 and N65 Noise Contours but expresses concern that the proposals for the noise envelope are not sufficient and do not share technology benefits with local communities. The Council notes the CAP1169 process for a noise envelope and also suggests the Environmental Statement be updated to take account of likely or actual changes to airspace that are proposed by the airspace modernisation programme.
- 1.14.24 The Council seeks more detail on ground noise, including publishing the 2016 report of background noise levels around the airport in the Environmental Statement and requests a review of the noise mitigation and compensation scheme. The Council believes that the outer zone offer could be more flexible so properties that either already have ventilation or are unable to have ventilation fitted can benefit from it in an alternate way.
- 1.14.25 Concern is expressed about the level of engagement with the Council prior to the public consultation and says there was little opportunity to discuss technical methodology or options and alternatives for the Project. It says further opportunities to engage after the pre-application consultation would be welcome.
- 1.14.26 The Council requests all documents relevant to the consideration of the Environmental Statement to be supplied promptly and in a reader friendly format. It asks for early engagement with the joint authorities about the Environmental Statement and requests that the joint authorities agree timescale for processing and responding to the consultation.

1.15 East Grinstead Town Council

- 1.15.1 East Grinstead Town Council says it understands the case and rationale that has been put forward for the need for growth and has no objection to Gatwick growing or the proposals presented about the northern runway project.
- 1.15.2 The Council believes the highway improvements need to be wider than just the spur roads to take into account the westerly bound traffic approaching the airport and the proposed increase in car parking spaces. It calls for upgrades to the congested A264, dedicated bus lanes and potential for a park and ride to the east of the airport. It asks for a guarantee that the A22/A264 would not be a route for access for construction vehicles and says it would welcome investment from Gatwick to improve National Cycle Route 21 to make this another sustainable route to the airport for employees.
- 1.15.3 The Council welcomes the aspiration to create the airport of the future but is concerned about potential environmental and health effects on surrounding communities, particularly on the mental health and sleep patterns of East Grinstead residents. It says East Grinstead residents are

affected by departures and arrivals regardless of which direction the runway is being used and atmospheric noise can disturb sleep and the lifestyle of residents, but also acknowledges that noise from Gatwick has reduced in recent years. The Council calls for further research, mitigation and prevention of disruption to communities through noise from arriving and departing aircraft.

- 1.15.4 The Council welcomes the predicted significant increase in employment that the Project would bring and requests that jobs are advertised locally, with the intention that new employees are able to access the airport via sustainable transport rather than commuting from further afield.
- 1.15.5 The Council acknowledges and welcomes Gatwick's efforts to reduce its environmental impact. It notes Gatwick's plans to mitigate the effects of noise, air pollution, carbon emissions and other impacts, and enhance the natural environment where possible. However, it believes more needs to be done to offset the impact of the Project. It states that Gatwick must play its part in tackling climate change and air travel must continue to become greener. It notes a detailed Carbon and Climate Change Action plan is also being developed.
- 1.15.6 Concern is expressed about the potential negative impacts on historic buildings in Charwood and says this should be monitored and all mitigation approved by Historic England.
- 1.15.7 The Council says it would welcome an opportunity along with Mid Sussex District Council to discuss mitigation of potential traffic and congestion impacts for the parish.

1.16 East Sussex County Council

- 1.16.1 East Sussex County Council expressed disappointment that a number of requests to extend the consultation deadline so that additional information could be assessed, were not accommodated. It also says that requested demand forecasts were not received and expressed concern at the very technical information in the consultation documents.
- 1.16.2 The Council highlights concerns about the demand forecasts, including a lack of detail, no account of a third runway at Heathrow or increases in capacity at other airports, seasonality demand, optimisation of departure routes, and the overall reliability due to the methodology used. It suggests the need case is very generic and the fleet mix in the central case is very optimistic. The Council suggests that capacity 'with' and 'without' the proposals, lacks detail to validate the need case and needs further explanation. It says that except for fleet mix, there does not appear to be any sensitivity analysis considering different growth trajectories.
- 1.16.3 Concern is expressed that the baseline case may not be deliverable and that the projected increases in airport capacity, particularly the runway movement rate, cannot be delivered and forecasts should be reduced accordingly.
- 1.16.4 The Council questions the design for the northern runway, highlighting rules governing the operation of parallel runways and the controlled dependency between the two, suggesting it could make operations inefficient and more expensive, reducing the appetite for airlines to expand.
- 1.16.5 The Council notes the limited public transport options in parts of East Sussex and that most journeys are made by car. It suggests that the Project would be an opportunity to improve local bus services.

- 1.16.6 Concern is expressed that disruption at Junction 9 of the M23 will impact the local highway network around the airport, particularly the southbound off-slip road.
- 1.16.7 The Council considers there is a lack of detail about how greenhouse gas emissions and climate change will be mitigated, and requests detailed measures are set out in the DCO application.
- 1.16.8 Additional information is requested about the number of flights that would pass over East Sussex and the impact of noise on the health and wellbeing of residents, particularly vulnerable groups. and mitigation of noise effects. The Council asks for further noise assessments and more detailed mitigation proposals, along the extent of study areas – to be agreed with stakeholders - for air, ground, road traffic and construction noise to be defined and illustrated in the Environmental Statement.
- 1.16.9 The Council comments on the absence of a sustainability assessment and lack of assessment on the impact on local health and emergency services. It believes the Environmental Statement should focus on mitigation and compensation.
- 1.16.10 The Council asks how the project will benefit small businesses and expresses concern that the local economic impact assessment estimates are too reliant on Gatwick's traffic forecasts.
- 1.16.11 Concern is expressed about the potential for an increase in road traffic accidents, with the Council asking for more detail about how much car parking is needed for both passengers and staff, and how unauthorised off-site parking will be taken into account in the mode share modelling and assessment.
- 1.16.12 The Council considers that the noise insulation scheme offer in the outer zone should be more flexible for properties that already have ventilation or are unable to have it fitted. It believes the economic benefits should be shared with the communities who are most affected by noise and more information should be made available by Gatwick on how this will be done.
- 1.16.13 In relation to the noise envelope, the Council suggests:
- more detail on how benefits of new aircraft technologies will be shared between local communities;
 - adoption of a mechanism to allow for further reductions in the contour area limits with future technology improvements;
 - provision of information about the enforcement regime and consequences if the noise envelope limits are exceeded;
 - more detail on how potential compliance with contour limits will be achieved;
 - the existing restrictions on night flights to be defined in the noise envelope; and
 - consultation be undertaken with local communities and relevant stakeholders.
- 1.16.14 The Council asks for more clarity about construction traffic movements and makes several suggestions in relation to the construction noise assessment.
- 1.16.15 The Council believes the effects of night-time road traffic needs to be clarified in the Environmental Statement and highlights what it considers to be data gaps or inconsistencies in the documentation about noise, including assessment of highway works noise, construction traffic noise and night-time traffic noise.

1.17 Ebernoe Parish Council

- 1.17.1 Ebernoe Parish Council objects to the Project, expressing concern that existing flights from Gatwick already significantly degrade the noise environment, night flights are intrusive and involve significant light pollution from landing lights which affect the bat population in Ebernoe Common National Nature Reserve.
- 1.17.2 The Council considers the impacts of the airport fall disproportionately on rural communities who receive very little benefit from it. It also expresses concern about the impact of light and noise pollution on threatened protected landscapes, such as the Sussex Downs National Park, the Surrey Hills AONB, and the High Weald AONB.
- 1.17.3 The Council believes that the Project that would significantly increase emissions and is inconsistent with government and international commitments to reduce CO2 emissions.

1.18 Elmbridge Borough Council

- 1.18.1 Elmbridge Borough Council acknowledges the positive economic benefits the airport provides to the wider economy of the southeast. It expresses support for the public transport improvements, particularly rail services, to reduce the number of car journeys. It notes that air quality issues are driven by changes to road traffic and the modelling is focused on the affected areas, but Elmbridge is not one of these. It notes that traffic flow modelling between Junction 8 and 10 on the M25 indicated that traffic increases would be less than 2% due to the project.
- 1.18.2 The Council notes that existing flight paths are in an east-west direction and the proposals will not change this. It also notes that the noise impact of the project will not reach the borough and no new flight routes are proposed over Elmbridge.
- 1.18.3 The Council says it has discussed the proposals with Surrey County Council (SCC), who are providing their own response. It says SCC commissioned a review of the consultation documents, looking at the areas of needs and forecast, highways and transport and noise impacts. The council states that it shares SCC's concerns and conclusions.

1.19 Environment Agency

- 1.19.1 The Environment Agency (EA) notes that the flood risk assessment highlights the risk of flooding to the airport from nearby watercourses and their associated flood zones. It states that the flood defences can manage but not entirely remove the risk of flooding. It suggest the planning and design of proposals need to consider residual risk and that the flood risk model for the area needs to be updated and reviewed before the Project can take place.
- 1.19.2 The EA says mitigation for the loss of floodplain should be designed to take account of climate change and the development of a Flood Threat Plan will be critical to this. It recommends that the management of surface water flood risk requires further work, and an integrated fluvial and surface water model is necessary for understanding the full nature of the risk.
- 1.19.3 The EA states that all forms of development should be located outside of the floodplain and in areas of lowest flood risk. It states that the development should not increase flood risk elsewhere, result in a net loss of floodplain storage capacity, or affect any flood flow routes.

- 1.19.4 The EA notes that Section 6 of the Flood Risk Assessment (FRA) acknowledges the Project would increase fluvial flood risk if no mitigation were implemented due to loss of floodplain storage and severing of flood flow routes. It states that the proposed construction compounds should also be factored into floodplain mitigation calculations, and a construction flood management plan is needed to ensure there is no loss in floodplain capacity or increased risk elsewhere during construction.
- 1.19.5 The EA says Section 7 of the FRA discusses mitigation measures for the net loss of fluvial floodplain and an increase in impermeable areas. It notes that proposed mitigation includes flood storage and compensation areas and a diversion of the River Mole. The EA recommends construction of mitigation in the early years of development in order to avoid a net loss in the floodplain area. It also states that future maintenance of these mitigations is necessary to ensure long-term management of flood risk. The EA notes that the FRA states that some areas will be at an increased risk of flooding when compared with the baseline scenario once the mitigation measures are in place and suggests that a Flood Threat Plan should be provided to manage any residual risks.
- 1.19.6 The EA notes the use UKCIP09 data to assess the effects of climate change on peak river flows and says updated guidance is now available (UKCIP18) and recommends that the higher central climate change allowances are used for essential infrastructure. It recommends an adaptive approach be used for the project, to manage uncertainty in the climate and build resilience.
- 1.19.7 The EA states that any proposed works in or near the designated main river may require a Flood Risk Activity Permit. It says clarification is needed on surface access drainage for fluvial floodplain loss and the Mole upstream potential. The EA states that the Water Environment Assessment should illustrate the proposed culvert extension under the new northern runway.
- 1.19.8 The EA recommends against the use of culverting due to its negative impacts on flora, fauna, and sediment movement, with rerouting the River Mole around the airport boundary its preferred solution. This is because the proposed culvert extension under the runway will place significant ecological pressure on the River Mole, and the proposed mitigations are unlikely to be sufficient.
- 1.19.9 The EA recommends further de-culverting within the local area as part of the project works, for example to replace other culverts proposed for road widening on the Mole at the Longbridge Roundabout and the Burstow Stream tributary with clear span bridges.
- 1.19.10 The EA asks for further information on the flood compensation areas and suggests designing wider inlets/outlets to prevent sediment accretion that could lead to dredging. It also suggests conducting a regular River Habitat Survey and an assessment of fish passing through the runway culvert and notes that, for biodiversity reasons, the new watercourse needs to be free of netting. It recommends using the Biodiversity Net Gain tool to assess all impacts on local biodiversity.
- 1.19.11 The EA believes that the PEIR outlines most of the key elements to mitigate the Project's environmental impacts, but some areas need more detail or consideration. It notes that foul water plans will depend on Thames Water's expansion of Crawley Water Treatment Works and Trade Effluent Consent, which need to be reviewed if changes occur.

- 1.19.12 The EA says more detail is needed on additional water storage plans and de-icer modelling. It also recommends that the highway improvements should have detailed plans to manage and minimise run-off impact on the River Mole and its tributaries.
- 1.19.13 The EA states that plans for the groundwater comprehensively address their areas of concern at this stage. It notes that further investigations are proposed, the details of which will be decided once the various project options are finalised.

1.20 Forestry Commission

- 1.20.1 The Forestry Commission welcomes plans for the inclusion of a 15-metre buffer zone around nearby ancient woodlands during the construction phase and says this follows earlier advice given by both the Forestry Commission and Natural England. It suggests that a larger buffer zone around ancient woodland most likely to be affected by the proposals should be considered.
- 1.20.2 The Forestry Commission welcomes Gatwick's commitment to using dust suppression techniques to minimise the impact of construction on woodland sites. It asks that Natural England's comments on the effects of dust, noise and air pollution on ancient woodland be considered.
- 1.20.3 The Commission notes that the replacement of some broadleaved woodland with replanting is a long-term plan and there will be loss of habitat in the interim. It states that compensatory woodland should be planted in advance of works so that lost habitats are replaced more quickly. It recommends the use of UK-grown trees where possible to reduce the carbon footprint of supply and to minimise the risk of imported disease, stating that vigorous biosecurity should be enforced throughout, from the robust use and checking of plant passports to on-site biosecurity methods.
- 1.20.4 The Forestry Commission recommends the use of UK grown timber in the construction of appropriate buildings where possible. This, it says, will lock away carbon and demonstrate a commitment to sustainability and UK jobs. It states that all timber used should be certified under the Forest Stewardship Council, Programme for the Endorsement of Forest Certification, or similar recognised scheme.
- 1.20.5 It notes that a licence to fell trees would be required by Gatwick without planning permission.

1.21 Frant Parish Council

- 1.21.1 The Parish Council strongly oppose the Project, expressing concern that there would be more noise, more road and rail congestion, and worse air quality, negating the efforts of the Council to improve the local environment.
- 1.21.2 The Parish Council believes that the plans are contrary to the government's aviation policy and the consultation provides insufficient evidence to show that there is a genuine need for more capacity.
- 1.21.3 The Parish Council considers the assessment of perceived economic costs and benefits is flawed and based on questionable assumptions, including about the long-term impact of Covid-19 on air travel and increased passenger demand. It suggests that business travellers remain hesitant and new technology is removing the need for air travel.
- 1.21.4 The Parish Council notes that the Project is not expected to result in material net job creation at

the national level, and points to the conclusion in the consultation documents that local and regional job creation would be at the expense of other areas in the country. It also expresses concern that potential negative impacts of the proposals, such as on local tourism, are not included in the consultation documents.

- 1.21.5 The Parish Council does not support any additional land take for either construction or more long-term use. It believes the project will have negative outcomes for biodiversity and the environment, with particular impact on sensitive habitats and ecology, stating that this is contrary to requirements in the Environment Bill.
- 1.21.6 The Parish Council considers that the Project would result in a continuous and substantial increase in travel by car to the airport. It believes this is not sustainable and any increase in passenger numbers must be absorbed by a fit for purpose public transport system, calling for more investment to manage increased passenger numbers. It suggests this would reduce the need for road improvements and additional car parking.
- 1.21.7 In relation to the construction phase, it says the impacts would be prolonged and result in significant local disruption, congestion and increased noise and air pollution. It calls for proper mitigation through transparent modelling.
- 1.21.8 Significant concern is expressed that CO2 emissions would increase by 50% from levels in 2018 and the impact of this on the UK's ability to meet its carbon reduction targets. Due to prevailing wind direction, the Parish Council believes significant emissions will fall over the South Downs National Park and impact air quality in the parish.
- 1.21.9 The Parish Council believes that night flights should be banned due to the impact on sleeping patterns. It argues that Gatwick fails to acknowledge or measure the true geographical extent of its noise impact and that as a result, mitigation measures can only be inadequate and the analysis of the impacts from the project are misleading. It also notes analysis of flight paths and noise undertaken by local groups.
- 1.21.10 The Parish Council believes the noise envelope proposals include inappropriate metrics along with limits that do not comply with government policy. It states that the proposals are inconsistent with CAA guidance and lack adequate enforcement arrangements. The Council expresses concern that the proposals have been developed without stakeholder discussions.

1.22 Health and Safety Executive

- 1.22.1 The Health and Safety Executive (HSE) states that there are two major accident hazard sites in the vicinity of the proposed development: the Gatwick Airport storage and hydrant company (Shell Oil) and Esso Petroleum.
- 1.22.2 The HSE notes that some of the Option 1 CARE facility is within the consultation zone for these major accident sites, whereas Option 2 is not, however the HSE states that it does not currently advise against Option 1.
- 1.22.3 The HSE notes that the presence of hazardous substances will probably require Hazardous Substances Consent under the Planning (Hazardous Substances) Act 1990. It states that there are no HSE License explosives sites in the area of the proposed development.

1.22.4 The HSE says it has no comment from a planning perspective regarding electrical safety.

1.23 Heathfield and Waldron Parish Council

1.23.1 Heathfield and Waldron Parish Council strongly opposes the Project. It does not consider that the development is required or will be needed in the foreseeable future.

1.23.2 The Parish Council notes that Gatwick predicts that air travel may return to pre-Covid levels by 2023/24, but points to predictions at the time of writing that growth after that could be very limited.

1.23.3 The Parish Council welcomes the potential increased job opportunities and economic activity in the area however, it considers potential negative impacts on the parish would likely outweigh the benefits. The Parish Council believes the harm caused by increased noise levels, disrupted road traffic, damage to the environment and local habitats, and increased pollution levels make the Project unacceptable.

1.23.4 The Parish Council urges Gatwick to withdraw the proposals for the Project until a demonstrable need for increased capacity can be shown.

1.24 Henfield Parish Council

1.24.1 Henfield Parish Council strongly opposes the Project, citing its Parish Carbon Reduction Plan which rejects high-carbon developments and an adopted Climate Emergency Declaration, which helps councillors to consider plans in relation to their environmental impact. The Parish Council believes that the Project will have a detrimental effect on the climate, air quality and the natural environment in the local area. It believes that until aviation is less polluting, expansion should be stopped.

1.24.2 The Council welcomes Gatwick's intentions to maximise the use of small local businesses and says it hopes that future procurement will prioritise local business to boost the economy and reduce travel distances and environmental impacts. It believes that airport employees should be enabled to live as close to Gatwick for work as possible, and with staff travel plans in place, this would reduce their need to commute.

1.24.3 The Parish Council argues that the Project should aim for a maximum net increase in biodiversity, suggesting the hotel and office developments should consider having green planted roofs and walls to further enhance biodiversity and CO2 capture. It suggests that the water retention ponds should be future proofed to cater for very heavy and sustained rainfall and expresses concern that further building in the area will increase flood risk. It also highlights concern about the potential impact of the proposals and new housing development upon local water supplies. It calls for water-efficiency, the reduction of waste and the creation of on-site renewable energy sources to supply the new buildings, to be considered.

1.24.4 Concern is expressed about long-term damage to some local habitats and biodiversity from construction works. The Parish Council notes that restoring hedges, woodland and soil health, can take many years and replanting and recovery should be an urgent priority. It also requests proper consideration of the effects of increased night lighting on insects and bats.

1.24.5 The Parish Council welcomes proposals to support staff with sustainable transport options,

including the active travel plans. However, concern is expressed that rail capacity is limited and that further consideration needs to be given to additional local bus services with low emissions or electric fleets.

- 1.24.6 The Parish Council opposes the planned changes to the highways around the airport but welcomes measures to improve public transport. It supports the use of more zero emissions vehicles where cars are the only option.
- 1.24.7 The Parish Council welcomes the proposed best practice approach to managing the impacts from construction and plans to reuse and recycle waste. It supports efforts to reduce the impacts of construction traffic on public roads, including clearance of mud and soil from construction site entrances and ensuring roads are kept in good condition.
- 1.24.8 The Parish Council believes that the mitigations proposed by Gatwick cannot account for all the emissions resulting from the Project and suggests that the northern runway proposals are a risk to the UK's ambitions to reduce CO₂ and other emissions. It recommends delaying expansion until the aviation sector is truly carbon neutral, following improvements to aircraft technology and the maximisation of public transport use.
- 1.24.9 The Parish Council believes the noise envelope proposals appear reasonable. It believes that insulation and other measures in all areas affected by aircraft noise is essential.
- 1.24.10 The Parish Council considers that the consultation process appears to be comprehensive and offers different levels of details to a variety of stakeholders. The council says it is not aware how well the approach is working with local residents, but it is publicising the consultation without comment so that local residents can make their views known to Gatwick.

1.25 Hever Parish Council

- 1.25.1 Hever Parish Council strongly opposes Gatwick's northern runway proposals.
- 1.25.2 It believes that Gatwick has failed to demonstrate that there is a need for additional airport capacity that is consistent with government policy.
- 1.25.3 The Parish Council considers that the predicted employment benefits are misleading and points to the conclusions in the consultation documents that the Project is not expected to result in material net job creation at the national level, and local or regional job creation would be by displacement from other regions in the UK.
- 1.25.4 The Parish Council says the government's climate change advisers have made it clear that there is no case for additional airport capacity in the UK and that any net expansion would have unacceptable climate change impacts. It expresses concern that emissions attributable to Gatwick would grow significantly by 2038 and believes this would have a material impact on the UK's ability to meet its carbon reduction targets. The Parish Council believes Gatwick has no credible plans to mitigate the emissions because viable low carbon technologies do not currently exist for commercial aviation.
- 1.25.5 The Parish Council expresses concern that there is no assessment of the non-CO₂ effects of the Project and believes growth at Gatwick should be conditional on it achieving a progressive, material reduction in total climate impacts from a 2019 baseline. It suggests a reduction trajectory

should be set, independently monitored and enforced.

- 1.25.6 The Parish Council expresses concern about the consequences for residents under the flight paths in Hever Parish, suggesting property prices would be affected as there would be more noise, more road and rail congestion, and worse air quality.
- 1.25.7 Analysis of the noise impacts of the Project is viewed as misleading. The Parish Council also considers that the noise envelope proposals are inconsistent with CAA guidance and include inappropriate metrics and limits, do not comply with government policy, and lack adequate enforcement arrangements.
- 1.25.8 The Parish Council believes the proposals and potential impacts on local communities, the environment, and the climate, are unacceptable.

1.26 High Weald AONB

- 1.26.1 High Weald AONB (Area of Outstanding Natural Beauty) says its main concerns with the Project are increased carbon emissions as a result of more aircraft and vehicle traffic, and the impact of more flights on the tranquillity and air quality of the AONB. It states that tranquillity is identified in their Management Plan as part of the AONB's natural beauty and that increased carbon emissions will hinder international climate change objectives.
- 1.26.2 High Weald AONB states that the impacts of noise and air quality are often based on the number of people affected but it believes that this underplays the impact on rural populations that live in tranquil areas and on habitats and wildlife. It notes that the High Weald AONB is one of the best surviving mediaeval landscapes in northwest Europe.
- 1.26.3 Consideration of the High Weald AONB Management Plan is requested and the duty of all public bodies and statutory undertakers in Section 85 of the Countryside and Rights of Way Act (2000) to have regard to 'the purpose of conserving and enhancing the natural beauty of AONBs' is highlighted.
- 1.26.4 High Weald AONB states that its comments are advisory and are the professional views of AONB's Unit's Planning Advisor on potential impacts of the Project on the High Weald landscape, and that they are not necessarily the views of the AONB Joint Advisory Committee.

1.27 Historic England

- 1.27.1 Historic England welcomes the early engagement from Gatwick to explain work to evaluate the potential impact of the Project on the local historic environment.
- 1.27.2 Historic England highlights that the Sussex Low Weald is a landscape with considerable time depth and a broad range of heritage - buried and built, designated and undesignated, and from Palaeolithic through to 'modern' buildings associated with the early development of the Airport.
- 1.27.3 It identifies the potential for less than substantial harm to several undesignated archaeological assets in areas to the east of Gatwick Airport and states that there will be less than substantial harm to the significance of Charlwood Park Farmhouse, a grade 2 listed building, and a small number of grade 2 listed buildings on the periphery of the airport.
- 1.27.4 Historic England says Thunderfield Castle to the north-east of the airport may be affected by the

road improvement proposals and says it would welcome discussions about the potential impact and appropriate mitigations. It says any potential harm to Charlwood Park Farmhouse and several grade 2 listed buildings will need justification and asks to be involved in discussions about the potential mitigation.

- 1.27.5 Historic England states there is potential for far-reaching impacts from noise associated with the proposals, including the possibility of direct and indirect effects to currently unidentified built heritage assets. It believes that at this early stage, there is not enough information to assess the impacts and proposed mitigation.
- 1.27.6 Historic England says it is encouraged by the careful and considered approach being taken by Gatwick Airport, particularly in carrying out further assessments. It supports Gatwick's current approach to undesignated heritage assets, and to include unlisted but historic buildings, areas of potential archaeological interest and the possibility of undiscovered remains in their assessments.
- 1.27.7 Historic England says the likely harm to undesignated assets could be mitigated by an archaeological study that would enhance the understanding of the Wealden landscape. Historic England states that it is willing to contribute to further research and provide advice, which could help inform discussions around appropriate mitigation.
- 1.27.8 Historic England says further discussions with Gatwick about tranquillity and impacts on the settings of designated assets are needed. It considers Gatwick's conclusions that there would be negligible or minimal effects on some heritage assets as a result of its plans may need further testing.
- 1.27.9 Historic England states that its advice would be the same if these proposals were put forward for statutory approval and states that unless the issues highlighted are satisfactorily addressed, Historic England will not be able to fully endorse the proposals.

1.28 Horley Town Council

- 1.28.1 Horley Town Council supports the return of passenger numbers to Gatwick Airport and economic benefits associated with this following the Covid-19 pandemic. It says the local economy has suffered from the short-term and long-term impacts on the aviation industry from the Covid-19 pandemic in respect of job losses. However, it questions the demand forecast for the predicted levels of passenger growth and whether airlines will grow back above pre-Covid levels and suggests this brings the need for the Project into question.
- 1.28.2 The Council notes that it has historically supported Gatwick's growth based upon a one runway/two terminal approach, and this remains the case. From the information provided as part of the public consultation process, the Town Council says it objects to the Project on the following grounds:
- A potential increase in flood risk, significantly impacting the residents of Horley.
 - Inappropriate flood mitigation resulting in the loss of valuable amenity space at Church Meadows.
 - Insufficient level of information regarding sewage and wastewater capacity.
 - Significant adverse noise impacts to Horley residents from additional aircraft movements.
 - Significant adverse noise impacts from construction works, particularly to residents living in

Horley South (including the Gardens Estate and Riverside).

- Insufficient levels of information and inappropriate noise mitigation measures being considered.
- Concerns regarding the level and routing of construction traffic having an adverse impact on the local road network.
- Insufficient level of information about construction phasing.
- Concern that new road infrastructure and mitigation measures are being introduced after increases in passenger numbers.
- Concern about the rail capacity of Brighton Main Line.
- Air pollution from aviation, construction and operational phases adversely impacting residents of Horley, with a particular concern raised about high levels of ultra-fine particulate from aircraft in parts of Horley.
- Concern about the increase in greenhouse gas emissions and wider impacts on climate change.
- Insufficient justification for airport expansion in light of recent travel pattern changes following Covid-19 and the national and international commitments on carbon reduction.

1.28.3 The Council says it understands the reasons why Gatwick would wish to make one comprehensive DCO application, however it questions the inclusion of new hotels and offices and suggests these elements should be considered separately by the local planning authority, as no reasons have been presented for their exclusion from the normal planning process.

1.29 Horsham District Council

1.29.1 Horsham District Council opposes the Project and states that its position is in line with a previous Notice of Motion on Gatwick Airport expansion approved by Full Council. It expresses concern about the need case and baseline as well as the methodology used to produce the forecasts. It queries the lack of assessment of the likely provision of a third runway at Heathrow Airport. It calls for greater transparency and further analysis of the impact of other airports in the southeast increasing their capacity.

1.29.2 The Council is concerned that the study areas used for assessing population and housing effects do not provide sufficient understanding of the impacts on the districts and boroughs closest to the airport. It also seeks more information and analysis of the type and quality of employment that will be created and how this will impact housing needs, especially affordable housing. The Council believes further work is required to understand these impacts and associated housing needs.

1.29.3 The Council is concerned that the proposals do not adequately address their impact on climate change and says the PEIR and Cumulative Effects Assessment do not consider the Climate Change Committee's requirements for no net expansion of UK airport capacity unless emissions targets are met. The Council also wants more information on the proposed Carbon and Climate Change Action Plan, as well as assurances that local authority climate change plans and commitments will be taken into account. It also asks for a carbon model to capture data from all operations and journeys to and from the airport and expresses concerns about the air quality impact on Horsham District, particularly ultrafine particles. The Council believes that Gatwick

should commit to limiting the airport to a two-runway operation and agree to a voluntary cap on passenger throughput as part of its responsibility to help address climate change.

- 1.29.4 The Council expresses concern about the use of the National Trip End Model (NTEM) for the Core Modelling, which it believes will not accurately represent the likely scale of growth in the area. It questions the exclusion of significant development sites, such as West of Ifield, and the inclusion of key road and rail network improvements that could skew results towards fewer traffic impacts than are likely to occur. In addition, the council questions the provision of 18,500 car parking spaces, as it would encourage more car-based journeys and undermine efforts to increase sustainable mode share targets. The council also calls for a non-technical summary of the transport assessment to be produced to enable interested parties to properly understand the proposals.
- 1.29.5 The Council expresses concern about Gatwick Airport's ability to achieve the stated 70 Air Traffic Movements (ATM) per hour and the potential impact on the little-used WIZAD route, which flies over residential areas. It believes the overall growth in aircraft movements will require changes in the airspace, and the proposed noise envelope does not align with the ANPS or CAP1129 guidance. The Council recommends that Gatwick develops a robust Air Quality Mitigation Plan and implements incentives to increase sustainable transport in the areas most affected by airport traffic.
- 1.29.6 The Council expresses concern about the impact of the Project on water resources and biodiversity and says the area where the airport is located is under serious water stress. It suggests the implementation of water efficiency measures and the consideration of water issues in the Cumulative Effects Assessment.
- 1.29.7 The Council notes that there is limited no information about biodiversity enhancements in the consultation documentation. It recommends that Gatwick works with all concerned stakeholders to meet the 10% Biodiversity Net Gain requirement mandated by the Environment Act 2021.
- 1.29.8 The Council expresses significant concern that the mitigation measures proposed will be inadequate to manage the significant social costs of the project. It believes that Gatwick should contribute more towards the costs of local infrastructure and affordable housing provision.
- 1.29.9 The Council believes the Cumulative Effects Assessment (CEA) has several omissions and errors in relation to the Land North of Horsham and expresses concern that this key strategic development site with planning permission for at least 2,750 homes, a business park, and community infrastructure, has been excluded from the assessment despite its proximity to the airport.
- 1.29.10 The Council believes that the PEIR does not sufficiently consider the temporary impacts on the housing market and economy during the construction phase and the effects on the construction workforce for existing strategic-scale development sites.
- 1.29.11 Concern is expressed about the effectiveness of Gatwick's engagement with local authorities. The Council also expresses disappointment about the lack of face-to-face engagement during the public consultation.

1.30 Horstead Keynes Parish Council

- 1.30.1 Horstead Keynes Parish Council says the village is regularly overflowed by aircraft on westerly approaches to or easterly departures from Gatwick, albeit at altitude and far quieter than in the past.
- 1.30.2 The Parish Council expresses concern that the Project will give rise to increasing demand for housing in an area that is already struggling to meet existing housing demand. It is concerned that the demand would have an adverse impact on the local built environment, the surrounding High Weald AONB and other nearby protected sites as a result of increased traffic and footfall.
- 1.30.3 The Parish Council considers that the proposals do not adequately address the potential adverse wider infrastructure impacts, such as significant additional traffic and congestion on the M23 (the main arterial route to the national highway network for local residents), more commuting and rat-running, and the speed and volume of traffic travelling through the village. It is also concerned at the potential for increased risk of accidents on small and poorly maintained local roads.
- 1.30.4 The Parish Council does not consider that 'Making Best Use of Existing Runways' document supports Gatwick's plans to shift from a single runway to two operational runways. It expresses concern about the impact of the increased hourly movement rate of aircraft during the summer with the Project. The Parish Council welcomes the trend towards quieter aircraft but calls on Gatwick to incentivise this shift away from older, noisier aircraft.

1.31 Kent County Council

- 1.31.1 Kent County Council strongly opposes the Project. It believes it would significantly increase aircraft movements and offer no opportunity for respite from runway alternation, resulting in unacceptable impacts on local communities. The Council believes the proposals are not in line with government policy and would effectively give Gatwick Airport a second runway without proper consideration of the impacts on communities and the environment.
- 1.31.2 The Council expresses concern that routine use of the northern runway would create extra capacity on the existing main runway and an increase in the number of larger aircraft arriving and departing from the airport. The Council expresses concern that this potential intensification of use is not properly assessed in the consultation documentation and therefore the full extent of the impacts are unknown. The Council believes this issue should be considered within the DCO.
- 1.31.3 The Council acknowledges Gatwick Airport's contribution to the economy through international connectivity but questions the economic case for the Project and remains concerned that Kent does not and will not receive a fair share of current and future economic benefits. The Council also points to a New Economic Foundation report that suggests the expansion is likely to result in the relocation of jobs, spending, and business from wider areas to the vicinity of the airport. It calls for Gatwick to work closely with 'Locate Kent' to promote business opportunities in the county and to help improve direct transport links to spread economic benefits. The Council also believes that analysis of tourism impacts is needed and encourages Gatwick to promote tourist attractions in the Five Authority Area.

- 1.31.4 The Council requests analysis of the cumulative demand for temporary construction workers and welcomes the development of a package of construction training, upskilling, and apprenticeship opportunities. It recommends further consideration be given to the areas where temporary construction workers will be housed, suggesting sustainable travel plans are implemented to ensure workers can get to the site with minimal impact on the existing transport network.
- 1.31.5 Concern is expressed about the lack of capacity and resilience in the motorway and rail networks with Gatwick reliant on the already very busy M23 and Brighton Main Line. The Council states that recent capacity improvements have been designed to handle background growth rather than additional passengers for Gatwick Airport. It expresses concern about the prospect of more HGVs using the M23 as a result of predicted increases in air cargo freight and also suggests that investment at Gatwick Airport will be needed to address this, as well as off-site improvements on the road and rail networks.
- 1.31.6 The Council highlights the lack of direct transport connections between Kent and Gatwick Airport, which it believes limits job opportunities for Kent residents. It calls for Gatwick to work with relevant partners to develop a direct rail service between Kent and Gatwick and argues this could be delivered with modest enhancements to infrastructure and would be a natural extension of the existing Reading to Gatwick services, extending to Canterbury West via Redhill, Tonbridge and Ashford.
- 1.31.7 The Council states that Gatwick's mode share data shows that almost 50% of passengers travel by public transport, but this is heavily skewed towards those travelling to and from London and other areas on the Brighton Main Line. The Council calls for the reinstatement of a direct coach service and direct bus and rail service connections to deliver a range of better sustainable travel options for passengers and staff. It believes these improvements will be needed between Kent and Gatwick Airport if the sustainable transport targets are to be achieved.
- 1.31.8 The Council believes the northern runway would have a significant material impact on the Government's ability to meet carbon reduction targets and this should weigh against granting development consent. It suggests that the Project alone would exceed the carbon contributions from all existing airports making best use of existing runways. It believes this is because the proposals do not legitimately make best use of an existing runway in the true spirit of the policy but rather bring into use a new runway with some functional limitations. It also expresses concern about the cost of greenhouse gas emissions and the assumptions about future growth in business travel.
- 1.31.9 The Council notes Gatwick's intention to publish a Carbon and Climate Change Action Plan that will set out actions to reduce climate impacts from construction and operations.
- 1.31.10 The Council believes the Environmental Statement must address the potential impact of released capacity on the main runway and fully loaded aircraft requiring a more aggressive take-off profile.
- 1.31.11 The Council states it has long argued that the noise impacts from overflying aircraft to and from Gatwick are unacceptable and highlights areas of west Kent such as Tunbridge Wells, Edenbridge, Hever and Penshurst, as particularly affected. It believes that despite aircraft becoming quieter, the increase in the number of movements predicted with the Project, will result in the noise environment around Gatwick being broadly similar to today. It considers that

technological improvements alone cannot be relied upon to reduce noise for communities as the airport grows and says this should be borne in mind when modelling future noise impacts and developing the noise envelope. The Council believes this would not be in keeping with the ethos of sustainable growth that was promoted in Gatwick's Master Plan.

- 1.31.12 The Council believes the noise envelope does not go far enough to reduce noise impacts because of the modelling used and that it is inherently easily achievable for Gatwick. The Council says although this design may give some greater degree of certainty on noise impacts, it does not support the approach. It also requests more information on noise envelope monitoring as well as likely penalties for breaches.
- 1.31.13 The Council expresses concern about the impacts of night flights in west Kent but welcomes proposals to limit use of the northern runway to the period 06:00 – 23:00 hours. It notes the importance of Gatwick using its existing channels of engagement with Local Authorities, community noise groups, the DfT and others, to really understand where concessions can be made that would make a meaningful difference to residents living under the flight paths to and from the airport.
- 1.31.14 In relation to the noise insulation scheme, the Council welcomes the proposal to extend the outer zone to south Edenbridge but urges Gatwick to extend both the insulation scheme and the noise envelope further east to cover the whole of Edenbridge.
- 1.31.15 The Council said it was pleased that the public consultation period was extended to 12 weeks and that events were held in Kent, but suggested there was a lack of information about the locations and times for the Mobile Project Office visits. It expressed concern about the level of detail in some of the PEIR chapters but said it would welcome the opportunity to continue working with Gatwick through the DCO process.

1.32 Kent Downs AONB

- 1.32.1 Kent Downs AONB says its Management Plan (2021-2026) sets out policy for the conservation and enhancement of the Area's natural beauty, landscape and scenic quality and tranquillity and states that tranquillity is most affected by noise.
- 1.32.2 Kent Downs AONB expresses concern that the proposals to increase passenger numbers and aircraft operations would mean additional overflying with potential impacts to the Area's tranquillity, air quality and dark night skies. It expresses concern that the issues of air quality and dark night skies don't appear to be addressed by the PEIR.
- 1.32.3 It notes that most overflying at present is above 7000 ft but states that even at this altitude, Kent Downs is affected. It notes that the Study Area for Tranquillity Assessment of aircraft, includes land to the south of Sevenoaks within the Kent Downs AONB. Kent Downs believes that aircraft noise affects locations within the Kent Downs should be acknowledged and assessed.
- 1.32.4 Kent Downs notes the Project would result in some increase of overflights in the south west corner of the AONB and questions Gatwick's conclusions that the effects on the perception of tranquillity of high sensitivity receptors would be 'negligible' with 'minor' adverse effects. It also highlights an incorrect reference in the consultation documentation to the settlement of Merstham, which is not in the AONB.

- 1.32.5 Kent Downs AONB believes government policy to limit the number of people affected by aircraft noise has led to air traffic flying over less populated areas such as protected landscapes. It states that these areas usually have much quieter background noise than urban ones, and the presence of overflying aircraft is therefore much more noticeable. Concern is expressed about impacts of more aircraft noise on people's physical and mental health, and on the rural and tourist economy.
- 1.32.6 Kent Downs questions Gatwick's plans to increase capacity and flights and believes the Project will contribute to the climate change emergency.

1.33 Kidford Parish Council

- 1.33.1 Kidford Parish Council strongly opposes the Project as it believes there are already too many flights passing over the parish. It believes the emergency runway cannot be used in unison with the main runway due to safety issues and says the proposals are not in keeping with government policy of 'making best use' of current facilities.
- 1.33.2 The Parish Council considers that economic gain should not be at the cost of the local environment and the planet and expresses scepticism that the predicted employment associated with the plans will materialise.
- 1.33.3 The Parish Council expresses concern about the constrained capacity of major and local roads and rail links to manage the predicted increase in passengers and freight. It expresses concern about the impact to local roads when there are accidents on the M23 that will cause more delays and pollution.
- 1.33.4 Concern is expressed by the Parish Council about the potential increase in construction traffic as a result of major new road projects, construction of the new runway and taxiways. It believes the highway improvements will increase traffic and pollution and reduce air quality and calls for Gatwick to reduce passenger car journeys, not increase them. It also considers that building new highway infrastructure will increase flood risk in the area and damage local biodiversity by disrupting species connectivity corridors.
- 1.33.5 The Parish Council argues that the implications of the airspace modernisation programme should be considered as part of the Project and suggests it is inappropriate to present the noise envelope proposals at this time.
- 1.33.6 The Parish Council highlights that people who live in rural areas want to be able to enjoy the outdoors, and that is why they move to villages like Kidford. It expresses concern that despite aircraft becoming quieter, greater frequency of more planes landing and taking off from Gatwick, means more disturbance, including in areas further away from the runway and this is not being addressed.
- 1.33.7 The Parish Council expresses disappointment in the public consultation and says it was made aware of it by local environmental groups, not by the airport.

1.34 Leigh Parish Council

- 1.34.1 Leigh Parish Council strongly opposes the northern runway proposals and expresses concern about its potential impact on the environment, particularly with the predicted increase in CO2

emissions. It believes this increase is inconsistent with government policy and will impact the UK's ability to meet its carbon reduction targets.

- 1.34.2 The Parish Council believes Gatwick has not put forward a credible need case, as it believes there is substantial surplus in terms of both passenger capacity and air traffic movements. It considers the airport's historic rate of growth does not warrant the expansion proposals and suggests that with increasing public awareness of climate change it is more likely that both business and leisure travel will reduce in the coming years.
- 1.34.3 It believes the proposed increase in flights would significantly affect life in Leigh, which is under the flight path, with increases in noise disturbance for residents that would have a detrimental impact on both physical and mental health. The Parish Council says it does not think the proposals will benefit the parish as it believes there are many more negative impacts on the community than positive ones.
- 1.34.4 The Parish Council states that plans for improving landscape and ecology do not go far enough to offset the environmental impact of the proposals and considers that no additional land should be used, even temporarily, for the Project, as the potential impacts would be irreversible.
- 1.34.5 Concerns are expressed about the predicted increase in traffic movements around the airport and the congestion and pollution this would cause as well as more development to accommodate additional car parking. The Council believes there should be no increase in traffic with or without the proposals.
- 1.34.6 The Parish Council is critical of the proposed sustainable transport target and says that the increase in passenger numbers far outweighs the increase in sustainable transport. It believes this would therefore result in a steady and substantial increase in car travel to the airport.
- 1.34.7 Concern is expressed that the construction phase will cause additional upheaval, noise, air pollution and climate impacts and that these affects will not be sufficiently mitigated.
- 1.34.8 The Parish Council believes the Project must be conditional on a progressive reduction in climate impacts from 2019 levels. It states that sustainable alternatives such as electric and hydrogen aircraft will not make a significant impact in the near future and that sustainable Aviation Fuels are unlikely to be produced in large amounts.
- 1.34.9 The Parish Council considers the noise mitigation measures to be inadequate. It believes the noise envelope does not go far enough to protect communities under the flight path and is inconsistent with CAA guidance. It calls for a noise envelope to incorporate average noise contours and noise event frequency at different decibel levels.
- 1.34.10 The Parish Council notes that Leigh residents who live under the flight path but outside Gatwick's noise envelope are severely impacted by noise but receive no benefit and suggest that the noise envelope should be extended. It also calls for night flights to be banned due to their physical and mental health impacts on people living under the flight path.
- 1.34.11 The Parish Council does not consider that Gatwick has engaged in an effective manner with the public or Town and Parish Councils during the public consultation and says many people were confused by the long and complicated consultation document.

1.35 Leigh Village Parish Council

- 1.35.1 Leigh Village Parish Council says it has engaged with residents and sought to accommodate their feedback on the proposals alongside the considerations of the parish council in its consultation response. Based on the significant concerns and feedback from parishioners, Leigh Parish Council says it does not support the northern runway proposals.
- 1.35.2 The Parish Council believes the data used in the need case is out of date, suggesting this may lead to questionable forecasts, particularly when the Covid-19 pandemic and increasing environmental awareness is considered.
- 1.35.3 The Parish Council expresses concern about the planned increase in car parking spaces and suggests there is a lack of clarity about the predicted increase in car journeys. It also highlights the potential impact on local roads resulting from the road improvement works. The Parish Council predicts that traffic congestion, pollution, accidents and noise will increase within the village and says the speed and number of cars routing through the village is already a growing issue for residents.
- 1.35.4 The Parish Council states that Leigh Village lies downstream from Gatwick on the River Mole and expresses concern that the impact of the proposals on the drainage configuration and mitigation for downstream drainage is not explained clearly. It states that poor drainage is a long-term problem in parts of Leigh Village, with both the run-off and wastewater systems significantly under capacity.
- 1.35.5 The Parish Council acknowledges there are some local economic benefits from the Project but suggests that Gatwick's prediction that there would be no increase in housing need in the area indicates that much of the employment will be accrued outside the local area.
- 1.35.6 The Parish Council believes local and national concerns relating to CO2 emissions and a reduction in air quality have not been properly considered and the Project contradicts the prevailing direction of reducing emissions to combat climate change.
- 1.35.7 The Parish Council argues that the combined effect of the proposals, together with current pressures on local infrastructure, including roads, will magnify and negatively impact the wellbeing of Leigh residents.
- 1.35.8 The Parish Council requests:
- Greater clarity on the rationale for expansion of airport infrastructure.
 - More detail on traffic flows and mitigation within Leigh village and surrounds.
 - No increase in flight frequency, change in overflight location or noise envelopes.
 - Clarity on drainage arrangements affecting the course of the River Mole.

1.36 Lingfield Parish Council

- 1.36.1 Lingfield Parish Council believes the Project is at odds with current national and international thinking on climate change. It is concerned about air pollution and potential impacts from fine particulates.
- 1.36.2 The Parish Council believes the proposals will coincide with the airspace modernisation

programme and expresses concern that increases in air traffic will impact new areas.

- 1.36.3 The Parish Council says Lingfield is affected by noise from planes arriving and taking off, whichever way the wind is blowing and there is no escape from noise when residents are outdoors. It expresses concern that a significant increase in the number of flights will increase the number of times in any hour when residents are impacted by noise.
- 1.36.4 The Parish Council says the Tandridge Local Plan shows the rail network is close to capacity and that additional passengers travelling to Gatwick will use cars. It says the local motorways are full and if there are any accidents or roadworks, traffic is diverted onto local roads. It also expresses concern about the additional impact HGVs will have on already congested roads due to the predicted increase of freight and cargo at the airport.
- 1.36.5 The Parish Council highlights the problem of unauthorised parking, including Gatwick passengers parking in residential streets and taking taxis to the airport as well as unauthorised parking sites, which can appear suddenly and be very difficult to shut down.
- 1.36.6 The potential employment opportunities are considered to be of little benefit to the parish. The Parish Council states that affordable housing supply is a problem in the local area, particularly for workers in retail, hospitality and service industries. It believes that increased employment opportunities are not significant enough to outweigh the negative environmental, noise and air quality impacts.
- 1.36.7 The Parish Council suggests that the reduction in the number of workers at Gatwick due to the pandemic should also be taken into consideration - as many have retrained and found jobs elsewhere. It also suggests that an over-reliance on the aviation industry, which is vulnerable to pandemics, oil crises, economic downturns and climate change, is not suitable for the area, especially when the parish does not receive any wider benefits itself.
- 1.36.8 The Parish Council considers the digital approach to consultation and engagement, concerning. It believes as a result, a sizable proportion of residents who did not have ready access to the internet were unable to participate in the online public consultation. The Parish Council says that despite a request for paper copies to be kept in Lingfield Community Library and for additional visits to the area from the Mobile Project Office, the opportunity for direct engagement in the village was one Mobile Office visit where less than 20 individuals were seen to engage with staff.
- 1.36.9 The Parish Council states it will continue to actively participate in the rest of the DCO process.

1.37 Marine Management Organisation

- 1.37.1 The Marine Management Organisation (MMO) states that works within the marine area require a marine licence. It states that a licence would be needed for any works in the area below the high-water mark in accordance with the Marine and Coastal Act (2009). It states that such works include the construction, alteration or improvement of any works, dredging, or a deposit or removal of substance or object below the mean high water spring mark, or in any tidal river, to the extent of the tidal influence.
- 1.37.2 The MMO states that if consultation is undertaken on a mineral or waste plan or local aggregate assessment, marine aggregates should be included.

- 1.37.3 It says works that would affect a UK or European protected marine species, would require a wildlife licence.
- 1.37.4 The MMO says the northern runway proposals should confirm all relevant policies within the relevant marine plan for the area. It says a marine plan is a statutory consideration for public authorities to inform and guide decision makers on development in marine and coastal areas across England.

1.38 Mayor of London

- 1.38.1 The Mayor of London (MoL) strongly opposes the northern runway proposals, considering them to be incompatible with the UK's net zero target. It believes it is incumbent on Gatwick to show how the proposals will support decarbonisation without primarily relying on the development of new technologies.
- 1.38.2 The MoL expresses concern that there is no plan to consult on a Climate Change Action Plan before the DCO is submitted and believes it is not possible to provide a fully informed response without this plan.
- 1.38.3 The MoL states that the Project should not worsen health and quality of life and the reduced noise from new technologies should be used to benefit local residents rather than enabling more flights.
- 1.38.4 The MoL believes the surface access impacts need to be addressed, especially in relation to increased traffic forecasts on roads in South London and the likely congestion and air quality implications of this. The MoL suggests that the traffic impacts should be recalculated and the study area expanded to within South London. The MoL considers the congestion threshold employed by Gatwick, used to identify problem areas, to have an unduly generous impact criteria.
- 1.38.5 The MoL considers the air quality assessment to be inconsistent with the London Plan, which uses a different standard for assessment. The MoL states that until there is full confidence in the highway modelling, appraisal of the air quality assessment will not be possible, particularly in areas which are already pollution hotspots.
- 1.38.6 The MoL believes there needs to be more ambition to reduce car trips, for example by increased parking and forecourt charges and cheaper public transport. The MoL believes Gatwick's proposals to increase parking spaces at the airport contradicts this and undermines its sustainable transport targets. Instead, the MoL recommends that parking spaces be reduced, including existing off-airport provisions, and that passenger and staff mode share targets should better reflect the aspiration of no further growth in car journeys.
- 1.38.7 The MoL suggests that more electric vehicle infrastructure needs to be installed and that parking charges for electric vehicles should be discounted. It believes targets should be set for passenger and staff trips by zero-emission vehicles.
- 1.38.8 Overcrowding on train services to and from the airport is a concern. The MoL states that a lack of sufficient seating on trains during peak services will be made worse by additional airport passengers, especially those with luggage. It suggests that most airport passengers will board trains at the airport or London terminals and remain onboard on the most congested sections of

the service. It states that this will put extra stress on already congested services and requests further work to be undertaken to determine whether additional mitigation is required.

- 1.38.9 Despite concerns about overcrowding on train services, MoL considers rail as the primary sustainable mode to access the airport from London. It suggests that consideration of new initiatives to increase the attractiveness of rail, including ticketing and journey planning schemes, are needed. The MoL also suggests that the role of key interchange stations – such as East Croydon, Clapham Junction and Farringdon – should be considered to see what scope there is to facilitate improvements to trips to and from the airport.
- 1.38.10 The MoL states that reliance should not be placed on other rail capacity schemes where funding is uncertain nor divert rail capacity resulting from new schemes away from non-airport users to airport passengers.
- 1.38.11 The MoL highlights south west and south east London where rail is a less attractive mode of travel to the airport and suggests plans be developed to improve public transport access from these areas, for example through new direct express bus services.
- 1.38.12 The MoL requests further information on rail modelling including the validation technical note and consideration of luggage loads during peak hour trains. Additional information about predictions for car journey times ‘with’ and ‘without’ the northern runway and how these will be achieved was also requested along with further details on the assessments used for transport modelling.
- 1.38.13 The MoL expresses concern that the transport model calibration and validation are not compliant with the Department for Transport’s TAG.
- 1.38.14 The MoL requests that all the relevant plans and policies within the London Plan are considered.

1.39 Mid Sussex District Council

- 1.39.1 Mid Sussex District Council acknowledges Gatwick’s role in UK aviation and its significance as part of national infrastructure. It acknowledges that the airport is a major employer in the region and notes its contribution to inward investment. The Council believes, however, that the northern runway proposals will have significant social, environmental, and economic impacts.
- 1.39.2 The Council believes the underlying need case has not been adequately justified and assumptions made around the anticipated future airport capacity with and without the northern runway are not fully explained.
- 1.39.3 Concern is expressed about the study areas, methodology, and assumptions made around in relation to socio-economics. The Council says differing study areas within the documents make it impossible to compare and analyse the information. It suggests additional sensitivity testing to enable greater compatibility between the studies.
- 1.39.4 The Council considers Gatwick’s approach to assessing the relationships between housing delivery and labour supply, simplistic, which it says makes it unreliable. It considers Gatwick’s conclusions that existing local plans will provide sufficient labour supply to meet future job growth and will not increase housing need, incorrect. It also believes that local circumstances have not been properly reflected, particularly in relation to Crawley where local skills issues are a priority and asks for more information about the types of jobs that will be created by the Project.

- 1.39.5 The Council suggests working with further education providers and employers in the area to enable local people to gain the right skills to benefit from the employment opportunities generated by the Project. It suggests that the Outline Employment and Business Strategy should provide detail about how Gatwick will work with the Mid Sussex District Council and local businesses to attract employment to the district.
- 1.39.6 The Council considers the Habitats Regulations Assessment (HRA) to not be adequately robust. It also suggests that an in-combination assessment of the impact from the northern runway on Ashdown Forest should be carried out.
- 1.39.7 The Council expresses concern that traffic and transport assessments do not take account of the impacts of other nearby large development sites such as West of Ifield, Gatwick Green, and Horley Business Park. It states that these sites will have a cumulative impact on the transport network and the methodology for cumulative assessments should therefore take them into account.
- 1.39.8 Concern is expressed that there are Network Rail and National Highways schemes included in the future baseline assessments that are not fully funded. The Council believes that should these schemes not materialise, the Project's sustainable transport mode share targets may be affected. It suggests the unfunded schemes or those going through the planning process, be removed from the future baseline assessments.
- 1.39.9 The Council expresses concern about the presentation of traffic data in the PEIR. It is concerned about the implications for the local road network from the predicted increase in passengers and air cargo, which it says will need to be fully mitigated. It suggests that moving freight by rail needs to be explored further by Gatwick.
- 1.39.10 The Council suggests that Gatwick is relying on bus and coach operators to react to demand rather than proactively identifying investment in public transport. It is concerned that mitigation is too focused on airport passengers using cars. It considers Gatwick's mode share targets ambitious, and says it is unclear how the Gatwick Mode Choice Model has been developed.
- 1.39.11 The Council expects the Carbon and Climate Change Plan to explain how airport growth can be justified in light of local, national, and international carbon reduction strategies and targets, including the emerging Mid Sussex District Plan 2038 and the Sustainable Economic Strategy. It states that the Action Plan should fully address the costs of carbon and future abatement measures into forecasting work in relation to the Government Jet Zero Policy.
- 1.39.12 The Council considers the modelling used to assess changes in noise from the northern runway to be insufficiently detailed, making it difficult to scrutinise. It believes that a lack of clarity over future flight paths makes it impossible to confirm future noise impacts. It highlights its concern about an increased use of the WIZAD/Route 9 departure route, which historically is only used as a last resort and the impact this could have on residents in the northwest of the district.
- 1.39.13 The Council states that the noise envelope has been developed without consultation with stakeholders which does not comply with national policy. It believes that the noise contour approach to defining the noise envelope does not incentivise the use of quieter aircraft or show how the benefits of this will be passed onto the local community.

- 1.39.14 Concern is expressed about the reliability of baseline data and modelling undertaken to assess air quality. However, the Council notes that Gatwick intends to re-run the modelling for the Environmental Statement to address these issues. It states that when the updated traffic data is available, this will enable a better understanding of the change in volume of traffic on routes across Mid Sussex and whether additional trigger air quality modelling will be needed.
- 1.39.15 The Council states that ammonia has not been included in the traffic/air quality/HRA assessment and calls for the Local Authority Ashdown Forest Working Group's approach to monitor and model ammonia for future air quality assessments, to be followed. The Council suggests that Gatwick make a financial contribution to the Joint SAMM Strategy to manage recreational pressure in Ashdown Forest.
- 1.39.16 The Council considers the involvement of stakeholders in drafting the Environmental Statement as critical but says it has been provided with no information about how it will be involved. It calls for a Consultation Report to be prepared ahead of the DCO application submission and asks that the draft be shared with stakeholders before publication. The Council believes ongoing and constructive engagement during the DCO process is necessary to properly ensure that Project impacts are mitigated, and necessary infrastructure is in place.
- 1.39.17 The Council believes there was insufficient notice about the start of the consultation period, and this made it difficult for councils to collaborate and plan their resources. It believes this also made it difficult for councils to properly consider the technical information contained in the documentation. It considered the engagement with local communities insufficient, suggesting that the Mobile Project Office did not go to enough locations, and this limited people's ability to properly engage in the consultation process.
- 1.39.18 The Council says that it expects Gatwick to work constructively with them and others, particularly during preparation of Statements of Common ground and S106 agreements. It believes this will be critical to successfully mitigating impacts and supporting the necessary infrastructure, to ensure residents of Mid Sussex are not adversely affected.

1.40 Mole Valley District Council

- 1.40.1 Mole Valley District Council states that the National Policy Statement for making best use of existing runways does not apply to the northern runway proposals, as it involves repositioning the existing emergency runway.
- 1.40.2 Concern is expressed by the Council about demand forecasts and assessments, including in relation to:
- the accuracy of the base case and the level of detail provided around capacity 'with' and 'without' the Project;
 - how the future demand forecasts relate to the movements generated by the use of the northern runway;
 - the attainability of 70 movements per hour on parallel runways separated by 210m, highlighting issues around safety, complexity, and efficiency;
 - the robustness of baseline and 'with development' assessments, including in relation to the scale of socio-economic benefits in the case of slow demand growth;

- the effect on the Project of expansion at Heathrow or increased capacity at other airports in the south of England;
 - the type and quality of employment that will be created and how this would impact on local housing needs;
 - assumptions made around fleet mix and lack of consideration of different growth trajectories; and
 - potential future airspace changes.
- 1.40.3 The Council considers that both replacement CARE facility options and flue will impact some viewpoints, and potentially impact the wider historic environment. It asks for the inclusion of seasonal viewpoints of the airport particularly from Charlwood/ Horley Road in the Environmental Statement, suggesting the PEIR is underplaying the effects and appearance from some viewpoints. It also expresses concern that some views will be affected by the proposed decking of the North Terminal Car Park
- 1.40.4 The Council suggests that out of date survey and desk study information for some ecology and conservation assessments is used in the PEIR and should be updated for the Environmental Statement. It also requests the inclusion of proposals for Biodiversity Net Gain and ecological monitoring along with more information about priority species (eg Bechstein bats) in the Environmental Statement.
- 1.40.5 The Council expresses concern about ground disturbance on Museum Field. It states that there is little evidence in the PEIR about the impact on the geology beneath and land stability following the re-profiling of the land to form the flood compensation scheme.
- 1.40.6 In relation to water issues, the Council:
- expresses a preference for rerouting the River Mole and using clear span bridges rather than employing culverts;
 - requests further consideration of the temporary loss of floodplain storage due to construction compounds;
 - states there should be no loss in floodplain capacity or an increased risk of flooding elsewhere during construction;
 - suggests a construction flood management plan is required; and
 - notes that there is sediment accretion risk at the flood compensation area in Museum Field, which could require dredging.
- 1.40.7 The Council requests further details on mitigating potential impacts on water quality in the River Mole. It asks for more detail about how the Project would reduce water consumption and suggests further assessment of the extent of potential surface water flooding.
- 1.40.8 The Council believes the Project will result in more vehicles on surrounding roads, due to the additional car parking and road improvements. It believes that much greater emphasis needs to be placed on supporting a shift to more sustainable modes of transport. Concern is also expressed about how the predicted increase in cargo will be managed and accommodated.
- 1.40.9 Concern is expressed that the Project will result in increased greenhouse gas emissions (GHG) from both inbound and outbound flights. The Council expresses concern that the PEIR does not quantify non-GHG warming pollutants, which could be underestimating the climate impact of the

Project and believes the proposals will affect the Government's ability to meet UK carbon emission targets.

- 1.40.10 The Council is concerned about the increase in flight frequency and the impact on the historic environment, especially on heritage assets within 3 to 5 km of the airport. It considers the noise and visual movement of aircraft to have a much wider impact on the landscape surrounding the airport than is currently being considered. It states that other heritage assets that fall within the wider envelope also need to be recognised and assessed in the Environmental Statement.
- 1.40.11 The Council also considers the proposed Noise Insulation Scheme impracticable for some heritage buildings due to their historic nature and asks for a complete assessment of air noise on other Listed Buildings in Mole Valley.
- 1.40.12 Concerns are expressed about the impact of overflying aircraft on tranquillity on the Surrey AONB.
- 1.40.13 The Council does not consider the use of population size to measure noise impacts appropriate as it believes this minimises the magnitude of impacts and does not take into account the impact on rural areas around Gatwick.
- 1.40.14 The Council believes that Gatwick has pre-judged the noise envelope and local communities do not appear to have been given the opportunity to influence its design. It considers the day and night contours insufficiently precise due to modelling limitations and suggests use of N60 and N65 and secondary tracking metrics instead. It believes a noise monitoring and management scheme should be brought forward to demonstrate how the airport will track the performance of the envelope and suggests the noise impact should be further mitigated by providing a greater share of the technology improvements than currently offered.
- 1.40.15 Concern is expressed that noise impacts on residents at the western end of the runway will be significant and justification should be provided in the Environmental Statement as these locations have not been identified as experiencing 'Major' Adverse effects.
- 1.40.16 The Council believes the noise insulation scheme needs further work to address concerns of local residents and requests more detail is included in the Environmental Statement.
- 1.40.17 The Council considers it is unreasonable to downgrade the severity of construction noise impacts based on the size of the population affected.
- 1.40.18 The Council believes that the overall predicted improvement in air quality from 2018 to 2032 will be unrelated to aircraft and the airport. It expresses concern about the levels of nitrogen dioxide concentrations to the north of the airport by 2032 and also suggests that the air quality impacts of Pier 7 should be modelled.
- 1.40.19 The Council states that project dust monitoring must be installed at the start of the Project and run throughout the duration of the works. It expresses disappointment that there is no discussion in the PEIR of ultrafine particles nor mention of mitigating emissions from the airport itself.
- 1.40.20 The Council suggests production of an Air Quality Mitigation Plan to mitigate both airport and airport traffic-related emissions. It says an increase in healthcare capacity as a result of the proposals is expected to be marginal and temporary, but mitigation should be further investigated by Gatwick.

1.41 National Highways

- 1.41.1 National Highways (NH) states that a full understanding of the impacts – and adequacy of proposed mitigation - of the northern runway on the Strategic Road Network (SRN) requires completion of the multimodal traffic and microsimulation modelling.
- 1.41.2 NH notes the alterations proposed to the surrounding road network, including three junctions, two of which form part of the SRN and says it's unclear why only these junctions are being improved. It states that it will need to be satisfied that there are no adverse impacts at other locations on the SRN as a result of the Project.
- 1.41.3 NH states that Gatwick will need to demonstrate that the impact of more passengers travelling to and from the airport has been modelled robustly and, where necessary, mitigations are scoped and designed to accommodate the additional demand. It states that Gatwick will need to be able to demonstrate that there will be no adverse congestion impacts at J9 and also further afield on the SRN.
- 1.41.4 National Highways welcomes the target of 60% of journeys by sustainable transport but asks for further information on how Gatwick intends to achieve this. It considers the significant increase in on-site parking provision to be counter-intuitive to this target.
- 1.41.5 NH states that it would welcome the opportunity to work with Gatwick to define several sensitivity tests that it needs to undertake to explore some of the model parameters which are driving the passenger demand forecasts and resulting highway flows.
- 1.41.6 NH says it will continue working with Gatwick to ensure safe and reliable solutions for the proposed highway schemes at the North and South Terminal roundabouts.
- 1.41.7 NH states that suitable futureproofing provisions need to be included in the proposals that will allow for the growth of the SRN along with suitable mitigation measures. It states that road traffic noise mitigation for the SRN will need to comply with DMRB standards and the measures will need to be designed to the appropriate level, agreed with National Highways and responsibility for their maintenance confirmed.
- 1.41.8 NH notes there is no mention of mitigating noise impacts in relation to affected properties within Noise Insulation Schemes (NIAs), of which there are two located along the SRN that are within the proposed site boundary and others located along the M23 and A23.
- 1.41.9 NH requests further explanation about the rationale behind the construction and phasing proposals, so that it is clear how Gatwick has considered the potential impact on the SRN in its decision making. To understand the impacts of construction, NH requested the following information:
- demonstration that the impact of the construction has been modelled properly and mitigated as necessary;
 - information about construction phasing and traffic management information, to ensure the necessary road infrastructure and traffic management measures will be put in place to maintain the safe, efficient and effective operation of the SRN;
 - demonstration that designs comply with National Highways DMRB GD9044 , in relation to safety and customer impacts of roadworks;

- demonstration that all infrastructure designs are compliant with necessary safety requirements; and.
- demonstration that drivers are not distracted by new infrastructure in proximity to the SRN or between the scheme and the SRN.

1.41.10 NH notes that the proposals for the North and South Terminals would result in the loss of woodland, vegetation, trees, shrubs, hedgerow and habitat. It says it is unclear how the BNG calculations have been considered in relation to the SRN.

1.41.11 NH states that it will need to agree the following with Gatwick:

- the basis for the payment of any commuted lump sum;
- requirements for any land acquisition that may be necessary;
- delivery mechanisms for any required infrastructure; and
- any necessary agreements and consents, which will ultimately be required to satisfy the requirements of the DCO.

1.41.12 In advance of the DCO submission, NH states that it will need to agree:

- a Statement of Common Ground;
- mitigation for the impact on the SRN resulting from the northern runway;
- the wording of any requirements necessary to be included in the DCO; and
- protective provisions to ensure National Highways assets and interests are adequately protected.

1.41.13 NH says it will continue working with Gatwick to understand and manage the impacts of the Project. It recommends that joint governance arrangements be established to oversee the programme of works for the northern runway, to support the best outcomes for the Project and the SRN.

1.42 NATS

1.42.1 NATS Ltd (formerly National Air Traffic Services) believes the Project will reduce pressure on Gatwick's single runway for both arrivals and departures. It suggests that increased landing capacity would reduce the time that aircraft are held in a holding pattern before landing, and this would reduce carbon emissions.

1.42.2 NATS states that more take-off capacity would improve the number of aircraft departing on time and reduce taxiing times and this would provide significant environmental and efficiency benefits as aircraft will spend less time stationary with engines running. NATS suggests this could also potentially mitigate increased emissions from the additional flights generated by the Project.

1.42.3 NATS states that a less crowded and less complex airfield will be easier for air traffic controllers to manage and would contribute to improved runway safety and operations.

1.42.4 NATS believes that the Project would use existing flight paths, meaning there would not be any newly overflowed communities.

1.42.5 NATS states that the modernisation of airspace in southeast England should, given the current timelines, be in operation before the northern runway and no further changes to airspace should be required to accommodate the proposals.

1.43 Natural England

- 1.43.1 Natural England says the PEIR should provide detailed advice on mitigation measures to ensure the proposed scheme is sustainable and points out that currently it lacks detail about impacts to habitats such as hedgerows, ancient woodland and broadleaved semi natural woodland. Natural England believes it is therefore not possible to quantify whether the proposed mitigations are fit for purpose.
- 1.43.2 Natural England agrees with the list of sites identified by Gatwick that may be affected by the scheme and highlights four SSSIs that should also be included in the air quality assessment.
- 1.43.3 It suggests that the change in land use - for example, car parking area to flood storage area - can have significant effects on nearby ancient woodland habitats, and the 15m buffer around the car parking area does not fully address all impact pathways.
- 1.43.4 Natural England says the loss of or deterioration of irreplaceable habitat, like ancient woodland, should be addressed in the Environmental Statement. It states that river habitats and woodland hedgerows surrounding the site are of significant importance for mobile species such as bats. Natural England considers the maintenance of connectivity - to enable migration of species into the wider landscape - a significant factor for the Project. Natural England recommends the earliest possible implementation of measures to address these issues.
- 1.43.5 Natural England expresses concern about the approach taken in the PEIR to valuing habitats and species of principal importance and conservation concern. It recommends that Gatwick revisits this approach.
- 1.43.6 Natural England considers the biodiversity mitigation proposals to be unclear and lacking in the required level of detail to assess whether they will be sufficient. It suggests that a robust impact assessment at a landscape scale should be included in the Environmental Statement. It welcomes the radio tracking surveys that have been provided for bats that demonstrate the connectivity of the landscape within and surrounding the Project boundary.
- 1.43.7 Concern is expressed about the Air Quality Assessment presented in the PEIR and the absence of ammonia modelling. Natural England requests for ammonia emissions from road traffic and their subsequent contribution to nitrogen deposition, to be included in the Environmental Statement.
- 1.43.8 Natural England believes consideration of air quality impacts on all SSSIs should be undertaken for the Environmental Statement.
- 1.43.9 Natural England highlights concerns with the methodology used in the assessment of air quality impacts and says the Defra background mapping used in the assessment has not been compared to local background monitoring sites, and only roads 200m from monitoring points have been included in the study area. It suggests a detailed review of the site locations for all diffusion tubes excluded from the modelling to ensure that they are not discounted from use unnecessarily.
- 1.43.10 It notes that NO_x has been converted to NO₂ using the Clapp and Jenkin (2001) approach for road sources, rather than the more commonly used Defra calculator. It suggests comparison of the two approaches, so this does not result in different concentrations of pollutants.

- 1.43.11 Natural England expresses concern about the approach to monitoring road NOx.
- 1.43.12 Natural England believes the effects of traffic congestion have not been considered and state that the use of Factor 1 by Gatwick to assess traffic density could lead to an underestimation of the impacts of the scheme.
- 1.43.13 Natural England recommends that Gatwick seeks further feedback from affected AONB and National Park Authorities regarding the landscape and visual impacts of the project. Natural England notes that a small part of the High Weald AONB is within 5km of the project boundary, and there is one viewpoint on the edge of the AONB at Turners Hill (Viewpoint 16).
- 1.43.14 Natural England asks for further clarification about the methodology used for the Zones of Theoretical Visibility (ZTV) including whether or not it has been clipped at 5km.
- 1.43.15 Natural England believes the scope of the Landscape and Townscape Visual Impact Assessment (LTVIA) and the methodology for assessing effects on landscape and townscape receptors and visual amenity is in accordance with the Landscape Institute and IEMA's (2013) Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (GLVIA3).
- 1.43.16 Natural England suggests an explanation is needed as to why the ZTV indicates no visibility of the existing airport, but the LTVIA says the control tower is a distinctive landmark within the view. It also suggests that a methodology for visualisations would be useful.
- 1.43.17 Natural England suggests that the assessment of the effects of the Project on the tranquillity of nationally designated landscapes, such as the South Downs National Park, High Weald AONB, and Surrey Hills AONB, requires further explanation. It states that a clear methodology is needed to interpret Gatwick's conclusion that an increase in overflights would not significantly affect levels of tranquillity. It asks for more details about the methodology used for the assessment of effects on tranquillity, including magnitude of change criteria and descriptors of significance.

1.44 Network Rail

- 1.44.1 Network Rail recognises the importance of Gatwick Airport to the regional economy and of the Brighton Main Line, which serves it. It supports Gatwick's target to increase the number of passengers accessing the airport by rail to 50% and staff using sustainable transport to 60%, but states that reliably appropriate passenger capacity must be provided throughout the day to deliver this.
- 1.44.2 Network Rail believes the consultation documents imply further Thameslink enhancements are still to be introduced. However, it states that this is unlikely to be the case before operations of the northern runway begin. It requests that assessments of rail demand be updated to take this into account.
- 1.44.3 Network Rail says that the CARs (Croydon Area Remodelling) programme, designed to relieve bottlenecks at Croydon, is included in the future baseline for the strategic modelling. It states that it is understood from consultation with Gatwick that the additional capacity provided by CARs is only included in the 2047 modelling scenario and not 2029.
- 1.44.4 Network Rail highlights the current constraints on government rail investment and states that funding for CARs and the Brighton Main Line Upgrade Programme, is not guaranteed and it is not

able to confirm that the additional capacity will be available at the time assumed in Gatwick's strategic modelling.

- 1.44.5 Network Rail states that the passenger modelling focuses on the morning and evening peak hours. It believes that a greater understanding is needed of the mechanism for assessing crowding, particularly as more airport passengers travelling to Gatwick will result in additional standing on busy trains.
- 1.44.6 Network Rail states that while peak services traditionally have the highest passenger loads and highest train capacity, in recent years there have been large increases in off-peak travel. It states that rail services cannot run at peak capacity all day and expresses concern that the additional airport passengers will contribute to crowding issues at other times of the day. Network Rail also highlights the significant house building planned to the south of Gatwick and suggests this will also contribute to additional rail demand.
- 1.44.7 Network Rail states that the Gatwick station upgrade project is due to be completed in 2023 and will deliver additional passenger circulation capacity. It says the track enhancements will improve journey times on 29 services a day between Brighton and Gatwick but will not provide any additional capacity for more trains.
- 1.44.8 Network Rail acknowledges the desire for earlier trains from the Horsham area to Gatwick, but says it is challenging to provide this on a regular basis due to cyclical maintenance requirements. It states that maintenance practices are currently being reviewed to improve worker safety, which is likely to lead to more overnight maintenance rather than daytime work when trains are running.
- 1.44.9 Network Rail says it is happy to work with Gatwick to examine opportunities for using rail freight to support construction works, which could take more lorries off the local road network.
- 1.44.10 Network Rail states that an Asset Protection Agreement will need to be signed before Gatwick proceeds with any design or construction work alongside, above or below Network Rail's infrastructure. Further site-specific safety requirements, engineering technical approval and detailed conditions will need to be sought from Network Rail before the start of any development, construction or alterations to the site.
- 1.44.11 Network Rail states that a number of legal and commercial agreements will need to be entered into, for example, Method Statements, Connection Agreements, Property Agreements, and all other relevant legal and commercial agreements.
- 1.44.12 It adds that if Network Rail has any existing rights over or under any of the land within the DCO boundary, these must be retained. Network Rail says it has standard protective provisions which will need to be included in the DCO.

1.45 Newdigate Parish Council

- 1.45.1 Newdigate Parish Council strongly opposes the northern runway proposals. It believes the Project is unnecessary given the need to combat climate change by reducing flying. The Parish Council expresses disappointment that night flights continue during the summer months and states that the proposals are not supported by local councils in general.
- 1.45.2 The Parish Council considers the promise of new jobs at the airport is not good for the area as

many of these will be seasonal. It believes that diversification of the economy and employment is far more important for the long-term benefit of all the communities surrounding the airport. It suggests investment is needed in non-airport businesses to provide secure and long-term opportunities.

- 1.45.3 The Parish Council considers Gatwick's proposals to keep green space, protect important environmental and community assets, improve landscaping and provide public open space and footpaths and create new habitats, are the minimum a responsible company should undertake. It believes that the northern runway and further growth at the airport can only have a negative impact on surrounding communities and the environment.
- 1.45.4 The Parish Council suggests the proposals should be implemented with minimal disruption to surrounding communities. It states that rural areas with limited access to public transport already experience extra seasonal traffic due to the airport. It believes there is nothing in the plans that would improve local roads or access to the airport for people living in rural areas.
- 1.45.5 The Parish Council considers the plans to improve highways around the airport contradictory to its strategy to promote more sustainable public transport.
- 1.45.6 The Parish Council calls for all construction traffic to be carefully monitored and policed to ensure there are no shortcuts through rural villages around the airport during the construction phase.
- 1.45.7 The Parish Council considers the noise envelope proposals inappropriate. It suggests that frequency and concentration of noise should also be included as a metric and highlights that noise insulation in properties is insufficient to reduce noise from frequent overflying during the summer.
- 1.45.8 Concern was expressed about the online approach to public consultation and presentation of the consultation documents. The Council acknowledged that the consultation letter sent to local communities by Gatwick Airport was better managed than previously, but the Mobile Project Office should have visited all local villages to ensure residents had an opportunity to see the hard copies of the proposals.

1.46 Nutfield Parish Council

- 1.46.1 Nutfield Parish Council strongly opposes the Project. It believes the increase in flight numbers will cause unnecessary damage to the environment, including increases in pollution of all types of carbon release.
- 1.46.2 The Parish Council believes the aviation industry should abandon growth projects to reduce the rate of harmful emissions. It suggests Gatwick should take the opportunity to lead the aviation industry by cancelling the Project.

1.47 Ockley Parish Council

- 1.47.1 Ockley Parish Council says it is pro-business and supportive of sustainable growth but opposes the northern runway proposals. It expresses concern that the predicted increase in flights would have a significant impact on climate change. It suggests that due to increasing climate change awareness, there will be reduced demand for air travel in future meaning the northern runway

proposals are not needed.

- 1.47.2 The Parish Council believes any positive impact in relation to more jobs would mainly be cancelled out by the credits the airport would need to pay to mitigate its climate impacts.
- 1.47.3 The Parish Council expresses concern about the lack of housing that would be available in the area for new airport employees and the increase in transport demands, as workers commute, particularly by car, with all the associated air pollution and climate impacts.
- 1.47.4 The Parish Council believes Gatwick should provide more financial support to local authorities to invest in infrastructure, particularly new housing. It also expresses concern about the impact that new housing and infrastructure will have on the rural nature of some areas around the airport.
- 1.47.5 The Parish Council expresses concern about the impact of the Project on air quality and suggests there are already some areas around Gatwick that exceed World Health Organisation satisfactory limits.
- 1.47.6 Concern is expressed about the increase in noise levels from aircraft and related road traffic and the impact this will have on the quality of life for parish residents. The Parish Council acknowledges that aircraft are quieter than some years ago but the increase in the number of flights would, it believes, cancel out the improvements in engine technology.
- 1.47.7 Concern is expressed about the 18,500 extra car parking spaces which the Parish Council suggests will mean a proportionate increase in passengers using private vehicles on already busy roads.
- 1.47.8 The Parish Council believes there would be limited economic benefits to Ockley and its surrounding areas, given the existing low levels of unemployment and the nature of the additional jobs that would be created by the northern runway.

1.48 Oxted Parish Council

- 1.48.1 Oxted Parish Council is opposed to the northern runway proposals and argues that the need for growth has not been demonstrated. It believes the airport currently operates with significant excess capacity and use of the northern runway would result in more flight movements and a very significant increase in carbon emissions. It considers that this would be completely at odds with the UK's climate change objectives.
- 1.48.2 The Parish Council believes the additional employment generated by the Project would increase demand for housing in the surrounding area, creating land-use pressures. It also considers that large-scale airport-based economic expansion in the southeast of England would not be consistent with the government's levelling-up agenda.
- 1.48.3 The Parish Council expresses concern that the northern runway would put significant strain on local and regional transport infrastructure and that more flights will generate additional noise impacts for local residents living under the Gatwick flight paths.

1.49 Penshurst Parish Council

- 1.49.1 Penshurst Parish Council strongly objects to the northern runway proposals. It believes that the

consultation document gives a misleading impression of the need case and uses projections that are not consistent with the Airports National Policy Statement. It argues that Gatwick has not demonstrated a sufficient need for their proposals, particularly with a likely third runway at Heathrow Airport.

- 1.49.2 The Parish Council believes the assessment and report on noise and its effects on Penshurst and Fordcombe are misleading and contrary to government guidelines. It suggests that by using average noise levels Gatwick has provided a misleading metric on which to base future proposals. It also expresses concern about the noise envelope proposals which it believes uses inappropriate metrics that do not comply with government policy, lack adequate enforcement arrangements and have been put forward without stakeholder discussion, in contrast to CAA guidance and the approach taken by other airports.
- 1.49.3 The Parish Council suggests that the correct dynamic measure of noise should be the peak of each plane as it passes over and that averaging out noise impacts over the working day is misleading. It expresses concern about the potential noise impacts from the predicted increase in aircraft movements.
- 1.49.4 The Parish Council considers the predicted economic effect of the northern runway to be questionable and based on out of date assumptions. It also suggests that there are errors and omissions in the economic analysis.
- 1.49.5 The Parish Council is concerned that the effect of the third runway at Heathrow and growth at other airports, are not considered by Gatwick. It believes that more realistic assumptions would demonstrate that the Project is unlikely to offer any significant benefit to the UK.
- 1.49.6 The sustainable transport target is considered inadequate by the Parish Council, as the increase in passenger numbers Gatwick is seeking far outweighs the proposed increase in sustainable transport use. The Parish Council states that the plans would result in a steady and substantial increase in car travel to the airport, with total passengers arriving by car in 2047 over 40% higher than in 2019.
- 1.49.7 The Parish Council expresses concern about the predicted significant increase in CO2 emissions and suggests this would have a material impact on the UK's ability to meet its carbon reduction targets. It considers Gatwick's plans for mitigating the increasing emissions unconvincing, as there are currently no proven technologies for reducing commercial aviation CO2 emissions at scale. It believes this makes the proposals inconsistent with the government's policy to reduce global emissions.
- 1.49.8 The Parish Council believes the Project will have a negative impact on biodiversity and the environment, in contradiction to the requirements of the Environment Bill.

1.50 Pulborough Parish Council

- 1.50.1 Pulborough Parish Council strongly opposes the northern runway proposals and any growth at Gatwick Airport.
- 1.50.2 The Parish Council believes the impacts on local infrastructure and amenities have not been fully considered or justified. It highlights the following factors that it believes have not been adequately

considered:

- the need for new homes and associated infrastructure;
- concerns relating to traffic and transport for both passengers and staff;
- impacts on noise and air quality from both the construction and operational phases;
- concerns about greenhouse gas emissions and impacts on climate change; and
- understanding how expansion can be justified given national and international carbon reduction targets.

- 1.50.3 The Parish Council expresses concern about the significant predicted increase in car travel to the airport, with total passengers accessing the airport by car in 2047 over 40% higher than in 2019. It believes there should be no increase in the numbers of passengers accessing the airport by car.
- 1.50.4 The Parish Council states that the government's climate change advisors have made clear that there is no case for additional airport capacity in the UK and any net expansion would have climate change impacts. It expresses concern that Gatwick's proposals would increase CO2 emissions from the airport by nearly 50% from 2018.
- 1.50.5 Concern is expressed about the impacts from the Project on local communities under the flight paths, including more noise, more road and rail congestion, worse air quality and possible property devaluation. The Parish Council suggests that Gatwick's analysis of noise impacts is misleading and states that its noise envelope proposals are inconsistent with CAA guidance, as it was developed without any stakeholder discussions and contains no compensation mitigation, such as the banning of night flights.

1.51 Reigate and Banstead Borough Council

- 1.51.1 Reigate and Banstead Borough Council raises significant concerns about the Project, suggesting further evidence is needed to justify the scale of the project. It questions whether it will deliver the predicted level of growth. It believes more needs to be done to mitigate the impact of more emissions and noise pollution, particularly with regard to the construction works and highway changes. It highlights particular concern about the potential impacts on local communities and the potential heightened flood risks.
- 1.51.2 The Council believes that about two thirds of the growth is already possible without routine use of the northern runway. It questions the predicted passenger demand at Gatwick in view of greater climate change awareness and rising summer temperatures in locations in traditional holiday destinations served by Gatwick Airport, such as Greece and Turkey.
- 1.51.3 The Council considers the need case to be over reliant on overall projections of aviation growth for the UK and very generic. It states that the sections in the consultation documents on the capacity with and without the Project and about the demand forecasts, lack sufficient detail to validate the need case. It believes more information is needed to understand the forecasts and assumptions around passenger growth, and more significantly the need for the expansion at the airport.

- 1.51.4 The Council states that it would welcome the economic benefits from an expanded airport but believes more detail is needed about the ability of new workers to pay for local housing, suggesting many of the new jobs will be lower paid such as retail workers, baggage handlers and flight attendants.
- 1.51.5 The Council considers it more likely that lower skilled/lower paid jobs would be drawn from the existing labour supply, which could create employment shortages for other local businesses in the area. It questions the predicted low levels of new workers coming from Reigate & Banstead borough, an authority directly neighbouring Gatwick Airport with high levels of existing employment, in comparison with others further away and not in the labour catchment area.
- 1.51.6 The Council states that the borough has traditionally attracted people for its quality of life and expresses concern that the likely increase in noise and air pollution as well as traffic congestion might discourage people from moving there, leading to a decrease in the supply of higher skilled workers in the area. The Council says it welcomes the Outline Business, Employment and Skills strategy but seeks further detail on how training opportunities and supply chain engagement will be achieved.
- 1.51.7 The Council welcomes plans for a Climate Change Action Plan to accompany the Project. It believes airport expansion should be determined by the take-up of new technologies in the aviation sector in an attempt to reduce carbon emissions and suggests that Gatwick should do more to influence the aviation sector in the way it provides slots to airlines along with the types of fuel it makes available at the airport.
- 1.51.8 The Council believes the proposed South Terminal Works Compound would have a significant adverse effect on Horley Business Park and asks Gatwick to work with it and highway authorities on appropriate mitigation. It expresses concern about the works compound and the potential noise and light interference, the layout, its proximity to the proposed commercial offices, the height of the works offices and the concrete batching plant, the use of the compound as a transport hub and materials storage, operating hours and loss of planting.
- 1.51.9 The Council considers the proposed phasing of the Project to be flawed and suggests a review, as it believes major road works and flood alleviation measures should be completed before the northern runway is fully operational. It states that it would be prudent to carry out these infrastructure changes first, to minimise disruption to the highway network, local communities and businesses.
- 1.51.10 The Council suggests that an artificial lighting strategy be produced, given the significant changes to the road layout, loss of trees and potential impact on local communities and wildlife.
- 1.51.11 The Council notes that several public footpaths and a national cycle route will be disrupted during the construction phase of the highway access works and requests more details on the plans for managing these changes. The Council believes there is potential to enhance the quality of cycling around the airport and suggests the introduction of a segregated route along the A23 as part of the surface access improvements. It also suggests a mini-Holland style roundabout at the South and North Terminal Junctions, along with joining up to cycle routes through the proposed Horley Business Park towards Horley Town centre. The Council states that it would be willing to support

improvements to cycling and walking infrastructure including paths from Horley and the Horley Business Park to the airport and Gatwick Railway Station.

- 1.51.12 The Council considers the runway, taxiways, surface access alterations suitable DCO matters but states that the hotels, offices, car parks and terminal building extensions should be considered by the local planning authorities. It believes the inclusion of these minor developments in the DCO application undermines the process and removes local communities from having a say.
- 1.51.13 The Council believes the proposals to widen the A23/M23 spur and junction alterations will increase road capacity and traffic volumes on the local road network. It requests further details about the proposed widening of the Longbridge Roundabout and argues that the widening of the M23 would fundamentally harm Riverside Gardens Park, an important community asset. It expresses concern that the construction works on the North Terminal Junction grade separation and South Terminal Roundabout Grade separation will have a significant impact on airport users, nearby residents and businesses, with delays and congestion being the likely outcome.
- 1.51.14 Concern is expressed about the proposed increase in car parking spaces when alternative sustainable access modes of transport should be prioritised. The Council considers the proposed car park on Pentagon Field unnecessary as there should be less dependency on private cars being parked at the airport.
- 1.51.15 The Council seeks more detail on the possible bridge works over the Brighton Main Line and Balcombe Road and its impact on Horley Business Park. It also expresses concern about the access arrangements to the Horley Business Park Site from the South Terminal Roundabout.
- 1.51.16 The Council says it is unclear what mitigation measures would be applied should the take up of sustainable travel modes not reach 60% by 2030 and suggests that monitoring of surface access will be key to support delivery of the 60% modal share split. Platform capacity at Gatwick Station during peak times is raised as a concern along with the potential for proposed network capacity improvements on the Brighton Main Line London being absorbed by Gatwick's passenger growth.
- 1.51.17 The Council expresses concern about the noise and vibration associated with the construction of the highway improvements to the A23/M23 spur and how it will affect the quality of life for nearby residents on the Horley Gardens Estate and in neighbouring streets. It expresses concern about the potential use of Compulsory Purchase Order powers to vacate premises closest to the Project works. It asks for details of how Gatwick would help to rehome any affected residents and highlights that there is already a constrained property market in Reigate and Banstead and the adjoining areas.
- 1.51.18 The Council states that the 2032 base case reveals a significant increase in road noise associated with more vehicles, in addition to the impact from highway works during the construction and operation phases. It asks Gatwick to consider using 'whisper' tarmac to reduce noise levels for local communities and to introduce a road speed limit of 40mph on the M23 spur and A23 between the South Terminal Junction and Longbridge Roundabout. It believes these measures would help to mitigate some of the impact of increasing traffic levels generated by the Project.
- 1.51.19 The Council suggests that the noise benefits associated with new technologies and quieter aircraft are being absorbed by Gatwick rather than shared with its neighbouring communities.

- 1.51.20 It asks for all of the noise mapping figures produced for the Environmental Statement to be made available in a format suitable for use on the major GIS platforms.
- 1.51.21 In relation to the Noise Insulation Scheme, the Council suggests that several measures be examined to help cool noise insulated properties in the summer months.
- 1.51.22 Regarding the proposed noise envelope, it states that there has been no consultation with the local community or relevant stakeholders to define the design of the envelope, in contrast to the work that has gone on at Heathrow.
- 1.51.23 The Council states that it is unclear why Gatwick is advancing its DCO application when the the airspace modernisation programme is still to be finalised.
- 1.51.24 The Council states that most of the predicted improvements in air quality appear to come from reductions in non-airport sources of pollution and in the airport related road traffic pollution, due to the take up of electric vehicles. It expresses concern that emissions from the airport itself will increase between 2018 to 2032.
- 1.51.25 It expresses concern that Gatwick has only modelled and reported on a single point within the air quality management area (AQMA) where aviation emissions have the biggest impact. The Council is disappointed that despite the airport contributing around 50% of the NOx pollution, there are no enhancement measures for air quality. However, it says it welcomes Gatwick's continued commitment to contribute to annual costs of the local monitoring carried out by local planning authorities.
- 1.51.26 The Council states that construction dust monitoring should be installed at the start of the Project to establish a baseline and run throughout the duration of the works. It expresses disappointment that there is no discussion of ultrafine particles within the air quality chapter given that airports are a significant source and that initial work around Gatwick indicates residents to the north east of the airport are being exposed to significant levels of these particles.
- 1.51.27 To support the DCO application, the Council suggests an Equality Impact Assessment should be undertaken to demonstrate how the Project may impact on different groups and to ensure that certain individuals are not put at a disadvantage or discriminated against as a result of its activities.
- 1.51.28 The Council believes the northern runway proposals will place further demand on local health provision and recommends that Gatwick engages further with the local Clinical Commissioning Groups, NHS England and the County Councils.
- 1.51.29 The Council expresses disappointment about the lack of hard copy documentation in borough libraries during the public consultation and believes this may have denied some people access to the consultation documentation. It expressed disappointment that staff on the Mobile Project Office referred people to a phone number rather than directly responding to questions.
- 1.51.30 The Council says it was grateful for the opportunity for members to speak online with representatives of the Project but expressed disappointment that the recordings of the meetings were not made available for distribution to other councillors who were unable to attend.

1.52 Riverhead Parish Council

- 1.52.1 Riverhead Parish Council says it tends to oppose the northern runway proposals, believing the need for additional capacity at Gatwick hasn't been demonstrated, especially post pandemic.
- 1.52.2 The Parish Council believes the predicted increase in CO2 emissions in the current global climate crisis is unacceptable. It states that the proposals would have significant consequences for local communities and people under flight paths, including worsening noise and air quality. It suggests that properties under flight paths could also potentially be devalued.
- 1.52.3 The Parish Council questions the economic benefits of the Project and points to the conclusion that it is not expected to result in material net job creation at a national level.
- 1.52.4 The Parish Council believes justification is needed regarding Gatwick's assumption that the Covid-19 pandemic will have no long-term impacts on passenger demand and that there will be a substantial increase in business passengers using the airport. It also believes that more work is needed to assess the impact of an increase in outbound tourism, not just inbound.
- 1.52.5 It states that it is not clear how the Project can have a positive impact on the environment as it would increase air pollution and noise impacts on sensitive habitats around the airport.
- 1.52.6 The Parish Council states that it does not support additional land-take either for construction purposes or long-term use. It calls for a public transport led strategy that would negate the need for much of the proposed footprint expansion and believes there should be no increase in the number of passengers travelling to Gatwick by car.
- 1.52.7 The Parish Council believes the sustainable transport target is inadequate and sufficient public transport capacity should be provided to accommodate all additional passenger demand. It believes Gatwick should be required to progressively reduce the absolute number of passengers accessing the airport by road, as a condition of expansion.
- 1.52.8 The Parish Council believes the impacts of the construction works - such as additional noise, air pollution and local transport impacts - should be considered much further afield, especially in communities near to the M23 and M25, as well those along the strategic road networks.
- 1.52.9 It considers that the Carbon and Climate Change Action Plan must be consistent with the government's policy requirement for the aviation sector to make significant and cost-effective contributions towards reducing emissions and to achieving net zero aviation by 2050.
- 1.52.10 The Parish Council believes that any future growth at Gatwick should be conditional on it achieving a progressive and material reduction in the total climate impacts attributable to the airport (inclusive of all surface transport and flight impacts) from a 2019 baseline. It suggests that a reduction trajectory should be set, independently monitored and enforced.
- 1.52.11 Concern is expressed at the level of detail included about the proposed noise envelope, with the Council seeking confirmation that it will be consistent with CAA guidance, compliant with Government policy and include adequate enforcement arrangements. It believes that approval of the Project should be conditional on a ban on all night flights for a full eight-hour period every night.
- 1.52.12 The Parish Council expresses concern that the public consultation documentation is not simple

enough to make it easy for the public and smaller public bodies to understand and respond.

1.53 Royal Mail

- 1.53.1 Royal Mail expresses support for the Project but is concerned about the potential for disruption to its road-based mail and parcel distribution operations during construction.
- 1.53.2 Royal Mail highlights its legal responsibilities as a provider of the Universal Postal Service, requirements to meet service delivery targets, and the potential financial penalties if they do not. It states that its performance of the Universal Service Provider obligations are in the public interest and should not be affected by any statutorily authorised project.
- 1.53.3 Royal Mail notes that postal sorting and delivery operations rely heavily on roads and that its ability to provide efficient mail collection, sorting and delivery to the public is sensitive to changes in the capacity of the highway network. It states that disruption to the highway network and traffic delays can have direct consequences on its ability to meet the Universal Service Obligation and comply with the regulatory regime for postal services, presenting a significant risk to Royal Mail's business.
- 1.53.4 Royal Mail highlights nine operational facilities within 8.4 miles of the proposed DCO boundary:
- Gatwick Air Hub, which is of high importance to Royal Mail's operations and is within the proposed DCO boundary. Any impact on vehicular access to and from it during the construction and operation of the Project will potentially be detrimental to Royal Mail's business nationally.
 - Gatwick Mail Centre is 1.8 miles from the proposed DCO boundary and is of national importance to Royal Mail's operations, processes mail and parcels. Any impact on vehicular access to and from Gatwick Mail Centre during the construction and operation of the Project will have a knock-on effect on services to each of these other operational facilities. It highlights the busy periods and notes that the centre will need to maintain access to M23 and to the surrounding delivery offices.
 - There are two other Royal Mail operational facilities within two miles of the Project site - a Delivery Office and a Parcelforce Depot. Both of these operational facilities are of regional and local importance and any changes to Royal Mail's ability to run services to and from them 24 hours, 7 days a week may potentially affect operations.
- 1.53.5 Royal Mail requests advance consultation and notification of any works that will affect the highway network. It says this will help Royal Mail's operational managers to mitigate and limit operational impacts and it identifies a main operational contact within Royal Mail for Gatwick to consult.
- 1.53.6 Royal Mail requests that the DCO should include a specific requirement to consult with them at least one month in advance about any proposed road closures, diversions, alternative access arrangements and hours of working. Royal Mail asks to see the content of the Construction Traffic Management Plan and requests inclusion of a mechanism to inform Royal Mail about works affecting the local road network, with particular regard to the identified distribution facilities.
- 1.53.7 Royal Mail asks to be part of any stakeholder consultation group set up by Gatwick with the local highway authority and other major road users.

1.53.8 Royal Mail asks for its stated requirements to be addressed as appropriate within Gatwick's DCO application documents and its Construction Traffic Management Plan in particular.

1.54 Rusper Parish Council

1.54.1 Rusper Parish Council believes the consequences of an increase in existing runway capacity and the development of the northern runway will result in a material increase in noise and pollution, particularly as 70% of air traffic movements take-off and fly at low level directly over Rusper Parish.

1.54.2 The Parish Council questions Gatwick's growth forecasts and the assumptions they are based on. It believes a combination of the pandemic and climate change is leading to a fundamental change in air travel. It states there is no mention of the potential impact on Gatwick if Heathrow's third runway is built, and suggests that a substantial amount of the present Gatwick traffic would probably move to Heathrow as a hub airport.

1.54.3 While it is acknowledged that aircraft have become quieter in recent years, the Parish Council believes there is no likelihood that noise levels can now be reduced by any material degree.

1.54.4 Concern is expressed about the potential demand for more housing and related necessary infrastructure as new people move into the area to work at Gatwick. The Parish Council also expresses concern about the potential for significant growth in the local population and associated challenges, such as road traffic congestion.

1.54.5 The Parish Council believes the Project is contrary to the Government's current strategy to encourage development and economic activity in less economically successful areas. It also states that the Project does not appear to be supported by recent independent economic assessments.

1.54.6 The Parish Council requests that its response to the northern runway consultation be shared with the Planning Inspectorate so concerns can be considered.

1.55 Salfords and Sidlow Parish Council

1.55.1 Salfords and Sidlow Parish Council strongly opposes the Project, questioning the need to bring another runway into regular operation. It also notes the Committee on Climate Change advice that no additional airport capacity is needed in the UK and any expansion would have significant climate change impacts.

1.55.2 The Parish Council believes that if additional airport capacity is required, better use of regional airports would create a more balanced national economy, in line with the Government's Levelling-Up agenda, rather than further concentration of infrastructure in the South East.

1.55.3 The Parish Council believes that any job creation at Gatwick would be by displacement from other regions and is concerned about additional pressure this would bring for new housing and other services. It believes the local economy is already too dependent on the airport, noting the recent high unemployment during the Covid-19 pandemic. It believes the economy would be better served through economic diversification on existing industrial sites and other brownfield land.

- 1.55.4 Concern is raised about the potential impacts on the landscape and ecology of the area. The Parish Council believes all construction work must be carried out within the existing airport boundary. The Parish Council also suggests the creation of a rail head in the sidings to south of the station into which bulk aggregate materials could be delivered, which help reduce HGV deliveries with their link to diesel emissions.
- 1.55.5 The Parish Council believes many local roads will be impacted by more traffic and congestion as a result of the Project. Concern is expressed about the proposed additional car parking spaces and the road traffic this would encourage. The Parish Council believes that even if more people use public transport, the significant increase in the number of new car parking spaces means there would still be many more using private vehicles to access the airport.
- 1.55.6 The Parish Council considers that more measures are needed to encourage use of rail following capacity improvements at Gatwick station and expresses disappointment that Gatwick is not encouraging better rail links from Kent into the airport.
- 1.55.7 Concern is expressed about increased air pollution around the area south of Horley, which the Council says is already very bad. It believes that adding more flights will only exacerbate this and expresses concern that measures to mitigate these emissions have not been presented.
- 1.55.8 The Parish Council argues that growth at Gatwick should be conditional on it achieving a progressive, material reduction in emissions from a 2019 baseline. It calls for a reduction trajectory to be set, independently monitored and enforced.
- 1.55.9 Concern is expressed about the size of the increase of the airport's CO2 emissions. The Parish Council believes the almost 50% increase would be inconsistent with Government policy and would have a material impact on the UK's ability to meet its carbon reduction targets.
- 1.55.10 The Parish Council expresses concern about the health risks associated with poor air quality and believes Gatwick should be required to develop plans to ensure its proposals comply with the latest World Health Organisation (WHO) guidelines. The Parish Council calls for all aspects of air pollution, including NO2, particulates and ultrafine particles to be modelled and reduced, including in areas affected by flights and surface transport.
- 1.55.11 The Parish Council believes that development consent should be conditional upon a number of additional measures, including:
- A ban on all night flights for a full eight-hour period every night.
 - A noise envelope that has been agreed with local communities and which achieves the government's policy requirement that noise must be reduced and mitigated as capacity grows and any benefits of growth shared with communities.
 - Noise, measured on an agreed basis and using a range of metrics, must fall from the actual levels in 2019 and the projected levels in 2029, prior to the start of dual runway operations, or the actual levels at that time if that is lower.
 - Recognition from Gatwick that nearby residents hear noise as a 'Single Event' and not 'smoothed' into a 16-hour Eq figure.
 - A progressive and material reduction in the emissions attributable to the airport, inclusive of emissions from surface transport and full flight impacts, from a 2019 baseline.
 - Gatwick should sign a binding agreement to stop flying whenever the pollution levels are

greater than they are now in 2021.

- A legally binding commitment that there would be no further runway, terminal or associated development at Gatwick, including no full new runway.
- No increase in road traffic to the airport, combined with a requirement to progressively reduce the absolute number of passengers, staff and other users accessing the airport by road.

1.55.12 The Parish Council says it believes the consultation process is principally designed to help promote Gatwick's proposals and to meet the Planning Inspectorate's test of community consultation. It expresses disappointment about the effectiveness of the Mobile Project Office for engaging with and informing local residents.

1.56 Sevenoaks District Council

1.56.1 Sevenoaks District Council opposes the northern runway proposals. It expresses concern that expansion will result in more aircraft movements and further noise disturbance for local communities and questions whether the case for growth has been made.

1.56.2 The Council acknowledges that Gatwick provides employment to some of its residents and believes there is further scope for maximising employment and economic benefits from the proposals for areas outside of the immediate vicinity of the airport. It welcomes the increase in job numbers but states the negative impacts of the proposals for Sevenoaks are not outweighed by direct economic benefits to the district. The Council also believes that Gatwick makes a number of assumptions which could have a significant impact on the overall cost benefit of the scheme.

1.56.3 The Council highlights poor local transport links and asks Gatwick to work with providers to improve them, so local people can better access the employment that will be generated by the proposals.

1.56.4 The Council expresses concern that the Project could result in an almost 50% increase of carbon emissions. It notes the development of Sustainable Aviation Fuel and asks for further information to understand how this could be used in the Carbon Action Plan to reduce the impact of the Project.

1.56.5 The Council believes the increase in emissions would have a considerable impact on the UK's ability to meet its carbon reduction targets. It considers that the proposed mitigations for construction and measures to encourage the use of sustainable travel are commendable but will have a negligible effect on the wider impacts of the Project. It also expresses concern that non-greenhouse gas effects have not been assessed or quantified.

1.56.6 The Council expresses concern about the impact of more passengers travelling by car on the already busy strategic road network particularly during peak hours, and suggests the additional proposed road capacity will cause further congestion and air quality problems. It believes the proposed road improvements are very localised and suggests there would be a negative impact on Sevenoaks due to the increase in airport passengers using roads in the district to access the airport. The Council expresses disappointment that the transport proposals would not improve accessibility between Sevenoaks and Gatwick and suggests this will place the road network under further strain without any mitigating improvements.

- 1.56.7 The Council notes that the majority of people in Kent travelling to Gatwick currently use the M25 and the M20 or M26, with all of these roads passing through Sevenoaks District and designated Air Quality Management Areas.
- 1.56.8 The Council highlights the challenges of travelling to Gatwick by rail from Kent, particularly when carrying luggage between services. It believes that any growth in passenger numbers at Gatwick should be supported by improved public transport links between the airport and Kent to alleviate the reliance on the strategic and local road network. It also suggests that the Project could be used as a means to improve rail links between West Kent and Gatwick and supports the reinstatement of direct services between Tonbridge and Gatwick (via Edenbridge).
- 1.56.9 The Council supports the aim of increasing the number of passengers and staff using sustainable transport but is concerned that there is little detail in the consultation documents about how this will be done, particularly in the wider region.
- 1.56.10 The Council states that rural areas surrounding Gatwick Airport have a quieter base level of noise, which makes aircraft noise more intrusive. It suggests that the difference between ambient noise and the peak level when being overflown is greater than that experienced in urban areas. It also believes that the approach and take-off of aircraft can be heard for a much longer period of time and that aircraft noise during the night time to early morning period is disruptive to residents' ability to sleep.
- 1.56.11 The Council believes the noise envelope proposals do not allow for a full range of noise to be captured and says it would welcome a noise envelope that accounts for average noise contours at various dB levels. Concern is expressed that the noise envelope does not reference any enforcement procedure, with the Council noting the importance of local communities being assured that the correct procedures are in place, monitored, and remediated by the appropriate body should a breach occur.
- 1.56.12 The Council welcomes the continued restriction of night flights between 11.30pm and 6:00am and believes they should be completely banned between 23:00 and 07:00.
- 1.56.13 The Council states that parts of the district are not situated within the proposed new noise insulation zones despite being significantly affected by noise disturbance. It believes these residents will continue to be affected by aircraft noise disturbance without being able to apply for any mitigation.
- 1.56.14 The Council highlights the national and regional tourist attractions, such as Hever Castle, Penshurst Place, Chartwell and Knole Park, and the importance of tranquillity to these attractions for visitors. The Council expresses concern about the impact on local historic landscapes and areas of outstanding natural beauty from an increase of over-flight and road traffic.
- 1.56.15 The Council welcomes plans to retain green spaces and to create a new habitat near the airport. It asks Gatwick to work with stakeholders to propose measures further afield in areas like Sevenoaks that will be affected by increased emissions from passenger journeys.

1.57 Sevenoaks Weald Parish Council

- 1.57.1 Sevenoaks Weald Parish Council objects to the northern runway proposals. It believes the

changes in travel habits caused by the Covid-19 pandemic mean that the economic case is questionable. It believes that greater awareness about climate change is also likely to mean that leisure travel, which Gatwick relies on, is likely to become less popular.

- 1.57.2 The Parish Council believes the benefits to the local community in terms of jobs are overstated and it is far more likely the proposals will lead to the creation of jobs on zero hours contracts or minimum wages.
- 1.57.3 It believes the Project fits badly with Government commitments to reducing emissions, with more aircraft, extra traffic and construction works all producing more pollution.
- 1.57.4 The Parish Council believes that the proposals would be better suited to another part of the country rather than the South East, in line with the Government's "levelling-up" policy.
- 1.57.5 It states that people living in villages in Kent, Surrey and Sussex do so largely because they enjoy the comparative tranquillity of country life and the northern runway proposals - both during the construction works and operations - would be detrimental to this enjoyment.
- 1.57.6 The Parish Council believes the northern runway proposals ignore the views of local communities and the current economic realities.

1.58 Slinfold Parish Council

- 1.58.1 Slinfold Parish Council strongly opposes the plans for the northern runway. It believes the public consultation documentation is flawed and contains misleading information. It expresses concern that the documents do not present sufficient detail of the impacted areas to allow the council to reach a fully informed decision.
- 1.58.2 The Parish Council expresses concern at the predicted increase in pollution and its impact on climate change.
- 1.58.3 Concern is also expressed that the noise data does not show additional noise under 61dB or above 7,000ft and says this means no data is provided to show an increase in overflight of Slinfold. It states that fuel saving is an important consideration for NATS, so it believes this will mean additional routing over Slinfold will be inevitable.
- 1.58.4 The Parish Council considers the proposed infrastructure for roads, rail, housing, and health will not be significant enough to support the Project. It also states that the airspace modernisation programme could mean a complete change in routing and so the future impact on Slinfold is unclear.
- 1.58.5 The Parish Council believes there is no guarantee of the promised jobs materialising due to automation and expresses concern about there being too much dependency on Gatwick for the local economy.

1.59 South Downs National Park Authority

- 1.59.1 South Downs National Park Authority states that it had not been approached by Gatwick in advance of the public consultation despite offering to work together. It believes the proposals do not demonstrate sufficient regard to the special qualities of the South Downs National Park.

- 1.59.2 The Authority requests clarity on the locations used to assess the impacts of noise on the national park and queries whether a desk study has been undertaken. It expresses concern about the lack of reference to the South Downs Integrated Landscape Character Assessment 2020 in the consultation documentation and says this contains valuable evidence and information regarding tranquillity and key sensitivities. It suggests this should be included in the Landscape and Visual Impact Assessment.
- 1.59.3 The Authority states that low and high-flying aircraft have an impact on the tranquillity of the national park. The Authority disagrees with Gatwick's conclusion that the data from the South Downs National Park Authority Tranquillity Study (2017) "indicate that the presence of overflying aircraft does not have a defining effect on the levels of tranquillity experienced in the National Park" and expresses concern that there is no assessment of seeing or hearing high-flying aircraft. It states that this was recognised as a detracting factor in the South Downs National Park Authority Tranquillity Study (2017) and should be included in the Environmental Statement.
- 1.59.4 The Authority considers the criteria for defining 'low', 'medium' and 'high' tranquillity in the PEIR is very broad and says it is unclear of its basis. It believes it is unclear how the SOAEL air noise assessment has been undertaken within the national park, and queries whether it is based on actual population density or assumptions.
- 1.59.5 Concern is expressed that light pollution and dark skies do not seem to feature in any assessment document. The Authority suggests the cumulative impact of the proposals is likely to lead to a detectable increase in light pollution and states that the South Downs is an International Dark Night Skies Reserve.
- 1.59.6 The Authority makes some suggestions regarding mitigation of the impacts of light pollution, including:
- Additional infrastructure should comply with the Institution of Lighting Professionals (ILP) guidance on obtrusive light, relevant British Standards and, where possible, deliver lighting schemes that reference the impact on dark skies and light pollution.
 - Lighting should have a colour correlated temperature (CCT) of 3000K or less and should point downwards (as far as it does not conflict with aerodrome lighting regulations in RA3515).
 - New buildings should avoid heavy use of glazing, in order to avoid unnecessary light spill from inside, as well as avoiding heavy use of external lighting.
- 1.59.7 The Authority believes that an increase in flights increases the probability of reductions in sky quality from contrails. It asks Gatwick to undertake further work to look at mitigation or compensation measures.
- 1.59.8 Concern is expressed at the potential deposition of nitrogen after the northern runway becomes operational, particularly in relation to the impact from holding patterns and how these may concentrate aircraft over the national park and other protected landscapes.
- 1.59.9 The Authority suggests that the 2038 future baseline, where there are no emission reductions, is not in line with the Government's UK Clean Air Strategy 2019 and net zero targets.
- 1.59.10 The South Downs National Park Authority expresses concern that no assessment has been

undertaken on the impact of visitors to the South Downs as a potential receptor. It points out that the Planning Inspectorate made specific reference to the need for National Parks and users of the Public Right of Way Network to be included in the Tranquillity Study as part of the PEIR.

1.60 South East Rivers Trust

- 1.60.1 The South East Rivers Trust considers plans to extend the current culverted River Mole are not the best option, but understands it is unavoidable and notes plans to mitigate this elsewhere on the river. The Trust notes that it would like to see improvements downstream around the north edge of the airport, where there are low flows and oxygen concentrations during the summer months. It believes these problems may be due to previous river diversions to accommodate the airport affecting the channel's gradient and dimensions.
- 1.60.2 The Trust considers the Project offers a good opportunity to improve the currently degraded floodplains of the River Mole and Gatwick Stream as well as the resilience of the watercourses.
- 1.60.3 Concern is raised about the predicted increase in road traffic as a result of the Project and the impact on the river water quality from road runoff. The Trust states that the watercourses already drain a large road network and new provisions such as attenuation ponds and downstream defenders to filter out pollutants from runoff before they reach the river would be welcomed.

1.61 Southern Gas Networks

- 1.61.1 Southern Gas Networks requests that Gatwick undertake any reasonable measures to safeguard their apparatus and say it would like an agreement on protective provisions in advance of the DCO submission and the relocating of the apparatus where necessary.

1.62 Speldhurst Parish Council

- 1.62.1 Speldhurst Parish Council strongly opposes the Project and believes it would have significant consequences for local communities living under the flight path.
- 1.62.2 The Parish Council believes aircraft noise would substantially increase and states that some residents of the parish are concerned about potential impacts on property values. It also expresses concern about the potential for additional traffic congestion in the local area and says it does not believe the mitigation proposed will be effective.
- 1.62.3 The Parish Council considers that Gatwick has not demonstrated the need for the additional capacity that the northern runway would bring, or that the proposals would provide better employment or economic benefits. It believes Gatwick's assessment of the economic benefits and costs of the proposals is misleading and that a realistic assessment of the adverse economic impacts, such as increasing outbound tourism and its impact on the UK tourism industry, have not been presented.
- 1.62.4 The Parish Council believes the proposals should maintain green space and preserve and protect important habitat and community assets.
- 1.62.5 Concern is expressed about plans to significantly increase the number of parking spaces and the capacity of the roads immediately surrounding the airport. The Parish Council considers the

increase in passenger numbers far outweighs the capacity of the sustainable transport proposals and, over time, this would result in a substantial increase in passenger car journeys. It believes there should be no increase at all in passengers accessing the airport by road. Instead, it says, Gatwick needs to develop realistic and viable public transport proposals as a condition of airport expansion.

- 1.62.6 Concern is expressed about the potential strain the proposals will place on the M25, M23 and surrounding roads. The Parish Council states that existing road congestion is of significant concern to local communities and further exacerbating the problem is unacceptable.
- 1.62.7 The Parish Council expresses concern about the limited passenger capacity on the Brighton Main Line and the conclusions of the rail modelling that show no significant crowding resulting from the Project. It also expresses concern that planned Network Rail improvements, which are not yet guaranteed, have been included in the modelling.
- 1.62.8 The Parish Council is very concerned that the northern runway would substantially increase CO2 emissions and that they would grow from less than 1% of total UK emissions in 2018 to over 5.5% of total UK emissions in 2038. It states that Gatwick has not presented credible plans for mitigating these increased emissions, because at present there are no proven technologies for reducing aviation CO2 emissions at scale. It believes the proposals are at odds with the government's policy requirement for the aviation sector to make significant contributions towards reducing global emissions and that the Project would have a considerable impact on the UK's ability to meet its carbon reduction targets. The Parish Council believes there should be no growth at Gatwick unless there is a plan to achieve a progressive, material reduction in the total climate impacts generated by the airport from a 2019 baseline.
- 1.62.9 The Parish Council believes Gatwick's analysis of the noise impacts is misleading and argues that the noise envelope proposals do not reflect the real levels and areas of noise impact. It believes the metrics and limits are inappropriate and states that there are no adequate enforcement arrangements. The Parish Council suggests the noise envelope plan does not comply with government policy, which requires noise to be reduced and mitigated as airport capacity grows.
- 1.62.10 The Parish Council believes the proposed noise mitigation measures are inadequate and states that noise insulation does not protect people from noise when they are outside or have windows open in the summer months. It also expresses concern about the potential impact of an increase in air cargo, both in terms of flights and road traffic.

1.63 Surrey County Council

- 1.63.1 Surrey County Council says it recognises the importance of Gatwick's role in supporting employment for Surrey residents and generating investment in Surrey's economy as well as retaining and attracting major business. It also understands the significant impacts that the pandemic has had on the aviation industry. However, the Council expresses concern about the impact of some parts of the Project and says these must be satisfactorily addressed. The Council believes that necessary supporting infrastructure should be in place before use of the northern runway begins, together with appropriate mitigation measures and commitments to address

environmental effects, particularly noise and air pollution impacts on local communities arising from both construction and airport operations.

- 1.63.2 The Council states that it has considered the consultation documents in the context of the Council's roles as the local highway authority; the minerals and waste planning authority for Surrey; a key infrastructure provider; and an authority with passenger transport and public health responsibilities.
- 1.63.3 The Council questions the need case and believes there is insufficient detail as to how the projections of future demand have been made and that significant passenger growth is assumed in advance of the Project without any form of planning process. It also states that it is unclear whether the baseline position set out in the consultation material is appropriate.
- 1.63.4 The Council questions whether it is appropriate that associated development such as parking, hotels and offices is included in the DCO. It believes these could be taken through a Town and Country Planning Act route.
- 1.63.5 The Council believes it is likely there will be a skills mismatch in the area following the Covid-19 pandemic. It believes that people who have been displaced from long-term jobs and careers will either have found new work at a similar level or remain unemployed. It states that these labour market changes highlight the need for training programmes. It questions whether the shortages in construction skills have been adequately considered and says it would welcome further discussions about apprenticeships, skills training, and attracting inward investment.
- 1.63.6 The Council believes it is unacceptable that road improvements needed for the Project are phased to be delivered after completion of the northern runway, and argues that the necessary infrastructure must be in place before use of the runway begins.
- 1.63.7 The Council believes further technical work is needed in relation to transport modelling, including for additional junctions as well as sensitivity testing and further details on assessment criteria. It also believes further technical work is required in areas such as heritage, landscape and visual impact, flood risk and drainage to inform the Environmental Statement. The Council requests involvement in this ongoing work.
- 1.63.8 The Council states that more detail is required in the public transport model on rail and bus and coach provision. It expresses concern that mode share targets will not be met, and that the mitigation proposed is therefore inappropriate and insufficient. It notes that rail capacity relies on schemes that are scheduled to be undertaken in the coming years and requests that the list of schemes is reviewed in light of the industry's review of Covid-19. It also asks that sensitivity tests are undertaken which exclude those schemes least likely to go ahead.
- 1.63.9 The Council expresses concern about the potential impact on sustainable travel of the amount of new parking proposed. It believes further sustainable and active travel mitigation measures should be included in the proposals and says it is concerned that the highway improvements do not currently facilitate active travel access.
- 1.63.10 The Council is concerned about potential conflict between the surface access satellite contractor compound and access to the Horley Business Park and, as a landowner, requests urgent discussions with Gatwick on access issues. It also asks for detailed input into the proposed

Construction Management Plan as it says questions remain in relation to timing and the specific construction routes.

- 1.63.11 The Council believes the environment is a key priority and, having declared a climate change emergency in 2019, has been developing policies to meet this challenge. It expresses concern about the predicted increase in emissions from the Project which would amount to emissions equivalent to 3.9% of the national emissions target by 2038. It asks for detailed information on how these and other emissions will be reduced. It believes the Project should be compatible with the legally binding target of net zero emissions by 2050.
- 1.63.12 The Council says it is concerned that Gatwick has presented its preferred option for the noise envelope without any prior engagement with stakeholders about the design, which it says is contrary to best practice. It suggests a design group should be set up to test various options and when operational, the envelope should be subject to independent scrutiny. Details of how the envelope would be enforced should also be addressed.
- 1.63.13 The Council believes the combined and cumulative effects of the Project on the health of specific populations, including Horley and Charlwood, need to be assessed. It believes these communities will be exposed to more noise disturbance and likely poorer air quality arising from construction and operation of the northern runway. It believes there needs to be detailed local health impact assessments for each of these communities, which should fully consider noise, air quality, and potential lighting impacts as well as combined and cumulative effects. The assessments should be used to inform compensation and mitigation packages for these residents. The Council calls for more air quality mitigation and enhancement measures and expresses concern that the health impact of ultrafine particles has not been considered to date and this should be addressed.
- 1.63.14 The Council expresses concern that greater overflight as well as noise disturbance from construction could adversely affect property values and believes this should be scoped in and inform compensation packages.
- 1.63.15 The Council recommends further appraisal of the heritage and archaeological significance of the airport itself and areas of the operational airport (and car parks) assumed to have low archaeological potential. It also suggests that further technical work is required in relation to viewpoints, visualisations, landscape character and green infrastructure. It also believes that designs with greater detail are needed in order to fully consider surface water flood risk and sustainable drainage impact.
- 1.63.16 The Council expresses concern about the differing programmes of the Project and the national airspace modernisation programme. It believes the overflight and noise impact experienced on the ground could differ from what is being presented in consultation as a result of airspace changes due to airspace modernisation. As a result, it believes that the airspace modernisation programme must remain 'scoped in' to the Project.
- 1.63.17 As an affected landowner, the Council believes the level of engagement from Gatwick has been insufficient to enable it to fully understand the northern runway proposals and it requests further detailed discussions as a matter of urgency. It says it needs more information on key areas to enable it to understand and develop an informed view of the likely environmental and health

effects on local communities from project construction and operation.

- 1.63.18 The Council expresses disappointment at the level of engagement about the proposals leading up to the consultation, especially the sharing of technical information, which it says contrasts with the experience of working with other promoters of airport expansion schemes in recent years. The Council says it believes this has impacted on its ability to provide detailed feedback and influence the development of the Project.
- 1.63.19 The Council notes anecdotal reports of confusion around the function of the Mobile Project Office, with residents expecting to be able to have detailed discussions. It calls for any further engagement with local communities and stakeholders to include a much greater face to face element.

1.64 Sussex Police and Crime Commissioner

- 1.64.1 The Sussex Police and Crime Commissioner says they will require assurances that any potentially adverse impacts from the Project will be identified and mitigated. The Commissioner says they are working with Sussex Police to ensure the measures outlined within the adopted Police Services Agreement are appropriate for the scale of development and that there will be no negative impacts to the wider provision of policing in Sussex.
- 1.64.2 The Commissioner states that the Project is likely to present the following issues for Sussex Police which will require detailed assessment and mitigation:
- Higher incidents of crime and disorder on site requiring police attention;
 - Additional custody provision, specifically capacity at Crawley custody centre;
 - Potential increased risk of terrorism;
 - Increased officer/staff numbers and recruitment;
 - The provision of a new suitable police station to accommodate officers/staff and provide adequate firearms training and storage;
 - Increased demands on firearm capacity available;
 - Additional safeguarding provision;
 - Operational planning;
 - Additional policing of the roads; and
 - Community policing.
- 1.64.3 The Commissioner highlights that Sussex Police currently operate at near or full capacity so any additional demand placed on them cannot be effectively mitigated through reliance on other sites in the area.
- 1.64.4 It is noted that the existing Gatwick Police Station site is nearing the end of its usable life and will not be fit for purpose with the predicted increase in passengers. The Commissioner says ongoing discussions about a new site have been positive and seeks assurances that the construction of a new police station can be brought forward.
- 1.64.5 The Commissioner believes that the construction phase will lead to an increase in HGVs and Abnormal Indivisible Loads and that incidents arising from increased traffic events may have an adverse impact upon roads policing functions. It is noted that the roads policing units are strategically resourced and located, based on current and predicted demand and that increased

demand on services in the north of the County will need to be assessed, with potential for changes to the policing operational model required.

- 1.64.6 The Commissioner believes that mitigation might include additional roads policing officers, vehicles, support, additional Automatic Number Plate Recognition cameras and support systems, additional speed cameras and other appropriate traffic management systems. The Commissioner says Sussex Police will need to increase headcount to meet the additional policing demands and this will require adequate training and tutor resources, including accommodation.

1.65 Sussex Wildlife Trust

- 1.65.1 The Sussex Wildlife Trust (SWT) says it welcomes the opportunity to comment on the northern runway proposals but is disappointed about a lack of previous engagement, which it felt would have put them in a better position to properly assess the Project.
- 1.65.2 SWT says it has taken a significant amount of time to understand the different elements of the proposals, including those that form part of the DCO application, those that are already committed to and those that don't require planning permission. It believes there is very little information provided about some elements of the project, such as the relocation of the Central Area Recycling Enclosure (CARE) facility and this makes potential impacts very difficult to assess.
- 1.65.3 Overall, SWT objects to the Project as it believes it would result in increased greenhouse gas emissions from more flights, and considers the proposals are not compliant with current government policy. SWT acknowledges the intention to produce a Carbon and Climate Change Action Plan as part of the DCO application but considers this should have been made available as part of the consultation.
- 1.65.4 SWT expresses concern about the level of detail relating to impacts or how these will be avoided, mitigated and compensated. It states that the exact locations of impacts and mitigation, compensation and enhancement are not clear, with areas overlapping each other on various figures and insufficient evidence provided to demonstrate the significance of impact.
- 1.65.5 SWT expresses concern about the loss of habitat that will not be compensated for until the end of the construction phase. It highlights the impact on woodland and the temporal loss in connectivity between habitats. It states that there is no discussion of Biodiversity Net Gain (BNG), despite this being an emerging requirement in the Environment Act and a key goal of Gatwick's ambitious Decade of Change document. It suggests that more can be done to improve connectivity and enhance habitats adjacent to the project boundary, particularly along the watercourses and hedgerows, and does not believe that the enhancements proposed are sufficient even before considering BNG.
- 1.65.6 SWT considers that surveys of the surrounding area should be undertaken to inform mitigation, enhancement, and BNG opportunities. It notes that a nightingale was recorded singing within the Airport in 2021 in two separate locations and believes Gatwick should update surveys with records collected by the Gatwick Biodiversity Advisor since the site surveys were undertaken.

- 1.65.7 SWT suggests Gatwick should provide justification for the values placed on each habitat, suggesting for example that the value of ancient woodland should be national, not regional as it is an irreplaceable habitat highly protected through national policy.
- 1.65.8 SWT says it expects the Environmental Statement to set out exactly what adverse impacts on biodiversity are likely to occur throughout the delivery of the scheme, and how this will be avoided and mitigated, as required by the mitigation hierarchy.
- 1.65.9 SWT supports the re-naturalisation of the River Mole and believes the Environmental Statement should confirm that the diversion of the River Mole corridor would not have any adverse impact on the hydrology of the ancient woodland. It suggests development of long-term plans for the river to benefit biodiversity and to create more resilience to future pressures, particularly climate change. It states that it would also support nature-based interventions to Crawters Brook and the Gatwick Stream.
- 1.65.10 SWT queries the reliability of the long-term protection of the compensatory habitat, as much of what will be lost through the scheme was planted 60 years ago to compensate for road creation. It believes more detail is required about the amount of habitat that would be lost.
- 1.65.11 SWT questions whether a 15-metre buffer to the south of Brockley Wood is sufficient and says it is very concerned that the impact on bats in this location has not been fully explored. It requests more information about how the habitat creation through the river realignment will physically relate to Brockley Wood when it appears that the airside satellite contractor compound will remain between the two areas until 2035.
- 1.65.12 SWT states that it is not clear if the assessment of nitrogen deposition includes increased nitrogen from an increased number of flights.

1.66 Tandridge District Council

- 1.66.1 Tandridge District Council believes the overall approach to 'need' is based upon a return to 2019 passenger numbers by 2030, and continuation of growth in passenger numbers. It suggests that Gatwick undertake a review of its data as it believes it is impossible to argue that pre-pandemic 'needs' and growth forecasts remain accurate. The Council believes current and future passenger data cannot be easily compared as the effects of the pandemic are still emerging.
- 1.66.2 The Council welcomes inclusion of a "no northern runway project" scenario based on the already consented schemes but believes the implication of the airspace modernisation programme should also be part of the scope of the proposals. It suggests that the pace of the DCO process be slowed to align more closely with the airspace modernisation programme.
- 1.66.3 The Council believes the baseline data and forecasting for economics, cargo, passengers, need, and growth are currently based on pre-pandemic figures and should be reviewed to reflect longer-term changes from Brexit and the Covid-19 pandemic.
- 1.66.4 The Council questions whether parts of the Project, such the hotel and office space and new car parks, should be included in the scope of the DCO.
- 1.66.5 In relation to the Outline Employment Skills and Business Strategy, the Council expresses concern about the reliability of pre-pandemic data and the lack of consideration of the impacts of

Brexit on the predicted socio-economic effects.

- 1.66.6 The Council states that the list of planning permissions in the local area in the consultation documentation does not accurately reflect the developments coming forward in Tandridge. It suggests further discussions with Gatwick so that there is a better understanding of the cumulative effects of development within the vicinity of the airport.
- 1.66.7 The Council expresses concern about the phasing of the Project, particularly hotels and offices coming before the runway itself. It believes the potential impacts on the road network from these developments need to be addressed.
- 1.66.8 The Council states that the Tandridge Local Plan and the review of the Surrey Hills AONB boundary should be taken into account in the landscape, townscape and visual resources chapter.
- 1.66.9 Concern is expressed about the potential impact of the Project on heritage assets. The Council notes that there are no noise-sensitive assets within the predicted noise change footprint in its area. It states that a call for nominations for locally listed heritage assets is currently underway, which may introduce new assets.
- 1.66.10 The Council expresses concern about the effect of nitrogen deposition on several ancient woodlands in the district. It notes the temporary loss of habitat along an east-west habitat corridor potentially used by bats and Gatwick's intention to undertake further surveys and report on these in the Environmental Statement.
- 1.66.11 Concern is raised about the Burstow Stream due to potential encroachment of the Project upon floodplains as well as increased run-off and contamination. The Council expresses concern about the lack of information on the Burstow Stream's geomorphology, highlighting modifications to attenuation ponds, drains, and outfalls that could impact it. The Council asks to be kept informed about potential flooding and surface water issues.
- 1.66.12 In relation to geology and ground conditions, concern is expressed about potential runoff from construction areas to soils and subsequent leaching into groundwater. The Council believes the construction of surface access works would introduce additional surface runoff but notes the proposed early installation of drainage during the construction process.
- 1.66.13 The Council states that there are no mineral safeguarding sites within their district but recommends that Gatwick engages with the Waste and Minerals Authority (Surrey County Council).
- 1.66.14 Concerns are expressed over the proposed surface access improvements and the lack of direct public transport connections between Tandridge and Gatwick Airport. The Council recommends Junction 6 of the M25 is included in the study area, with survey data updated to reflect current travel patterns. It also suggests capacity issues at the Felbridge junction on the A22/A264 should be addressed.
- 1.66.15 The Council believes Gatwick overestimates the speed of passengers shifting to sustainable transport modes, particularly with the level of car parking proposed. It believes that Gatwick has not properly considered climate change and should be more aspirational in terms of opportunities to improve the environmental impacts of its traffic and transport plans. It also expresses concern

about off-airport parking and the pressure this adds to the road network. Concern is also expressed about how construction traffic will be managed on the existing network.

- 1.66.16 The Council seeks more detail about the upgrades to East Croydon station and the Windmill Junction and requests that contingency public transport plans are put in place should these improvement works not go ahead.
- 1.66.17 The Council expresses concern that the data and information on climate change, including action plans and mitigation, will not be submitted until the Environmental Statement stage. It is concerned about the lack of information on climate change mitigation and the reliance on future technological innovations for mitigation. The Council believes environmental mitigation measures appear negligible in comparison with the size of the Project and suggests that other known solutions should be used instead. The Council believes Gatwick should be aiming to reduce emissions first instead of increasing them and then reducing them back to current levels.
- 1.66.18 The Council expresses concern about the potential impact of increasing flights on residential and commercial properties, which would be newly overflowed. It also questions Gatwick's ability to present a reliable picture of noise impacts when the airspace modernisation programme is still to be determined and believes the cumulative impact could be significantly worse than Gatwick predicts.
- 1.66.19 The Council expresses concern about an apparent lack of consideration of mitigation of impacts on communities to the east, particularly in relation to night flights and asks that this be revisited.
- 1.66.20 In relation to road traffic noise, concern is expressed that the modelling focuses on changes around the North and South Terminal roundabouts. The Council believes this approach fails to consider the cumulative impact of the traffic that will go through the M23 junction.
- 1.66.21 The Council asks for more detail on the compensation and mitigation measures for adversely affected stakeholders during construction and operation. It expresses concern that the full assessment of the effects of construction traffic and noise is to be deferred to the Environmental Statement stage.
- 1.66.22 The Council says its response to air quality matters will be submitted by the Mole Valley Environmental Health team, but it highlights research undertaken about the significance of air quality issues and the impacts for the A22 as well as the Ashdown Forest Special Conservation Area and Special Protection Area.
- 1.66.23 Regarding health and wellbeing, the Council states that night-time flights are not the only airport activity to cause sleep disturbance to residents in the district. It says that issues caused by passengers using local roads to access the airport will be exacerbated and calls for adequate mitigations to address these issues so that they are not detrimental to the health and well-being of its residents.
- 1.66.24 The Council believes there is a correlation between increasing passenger numbers using the airport per annum and the number of passengers who have been taken to hospital. It believes the Project would exacerbate pressures on the local NHS.
- 1.66.25 Regarding the public consultation, the Council states that Lingfield library was not included on the deposit locations list and suggests this could have had an influence on the number of people in

the district being aware of the scheme. The Council suggests more MPO visits should have been made to Tandridge. It also highlights some complaints that technical assistance was not readily available at the MPO and says it is unacceptable that people were directed to a phone line for more technical assistance instead.

- 1.66.26 The Council believes that Gatwick has been reluctant to allow meetings to be recorded, which it says would have benefited stakeholders in compiling responses.

1.67 Tonbridge and Malling Borough Council

- 1.67.1 Tonbridge & Malling Borough Council does not support the northern runway proposals. The Council believes the justification for expansion is inadequate and suggests that demand for travel post pandemic is likely to decrease, not grow.
- 1.67.2 The Council suggests the mitigation proposed is insufficient, particularly regarding surface transport connectivity with West Kent and notes that this has been a longstanding concern for the council. It believes Gatwick's sustainable transport target will be difficult to achieve without improvements to rail services and that the Project is too focused on road access and car parking. The Council suggests the plans lack ambition and Gatwick should do more to increase the percentage of passengers using rail. It believes a frequent direct rail connection via Redhill to Tonbridge could be funded should the northern runway proposals be submitted, urging Gatwick to work with partners to cost and fund this rail connection.
- 1.67.3 The Council considers the proposals are of limited benefit to its residents and businesses and will likely worsen the impacts of overflying for the Borough. It suggests that Gatwick work with the Coast to Capital LEP, South East LEP, JobCentre Plus and local authority economic development teams to ensure that employment and skills opportunities from the Project are available and well publicised to local people.
- 1.67.4 The Council believes the proposals are a comprehensive master plan to expand the airport and should be presented as such. It argues that the Project is more than an alteration to the use of the current emergency runway as it includes hotel accommodation, office accommodation and car parking spaces. The Council also believes the landscape and ecological mitigation proposals are limited in comparison with the plans to intensify use of the airport site and build new infrastructure. It expresses concern that there is no reference to biodiversity net gain.
- 1.67.5 The Council expresses concern about increasing emissions and states there are no methods available currently to reduce carbon emissions arising from air travel. It believes that decarbonisation technology like electric, hydrogen and hybrid aircraft is not yet ready and there is no clarity about the effectiveness of using sustainable fuels and off-setting in reducing the carbon impact of aviation operations.
- 1.67.6 The Council believes the benefit of quieter aircraft is likely to be offset by the predicted increased number of flights. It believes the outer Noise Insulation Scheme zone should be extended to align fully with the outer extent of the 51dB noise contour and include residents in Tonbridge. The Council considers noise monitoring and reporting should be carried out by an independent body such as the Noise Management Board.

1.68 Tunbridge Wells Borough Council

- 1.68.1 Tunbridge Wells Borough Council strongly opposes the Project as it believes it will lead to more flights, more pollution and environmental damage, which, it says cannot be justified. It believes that Tunbridge Wells is unlikely to see any wider economic benefits from growth at Gatwick but will be impacted by the noise from increasing numbers of aircraft. It believes Gatwick is seeking to encourage larger aircraft to the airport and expresses concern about the impact on borough residents from increasing air and noise pollution.
- 1.68.2 The Council believes Gatwick's aspiration to reduce CO2 emissions to net zero by 2030 will not be met by the strategy being proposed. It also states that there is little clarity on the use of sustainable fuels or new propulsion methods to remove carbon emissions.
- 1.68.3 The Council believes it is unclear how the shift to sustainable transport with or without the proposed use of the northern runway will be achieved. It suggests the ambition to increase modal shift to rail will be difficult without ensuring a frequent direct rail connection via Redhill towards Tonbridge and beyond, linking with appropriate services along this alignment. The Council suggests Gatwick develop a sustainable transport strategy with wider transport partners to cost and fund this rail connection to west Kent whether the northern runway proposals go ahead or not.
- 1.68.4 The Council considers the skills and job benefits are likely to be very limited for Tunbridge Wells due to poor transport links. It suggests that skills development and creating high quality jobs beyond the Gatwick Diamond does not appear to be considered in the consultation documentation, although it acknowledges there is a commitment to developing a plan during the next stage of work.
- 1.68.5 The Council acknowledges and supports Gatwick's plans to ensure small businesses have access to its supply chain. It believes these opportunities should be widened during the construction phase to include manufacturing and professional services.
- 1.68.6 The Council suggests the existing emergency runway already provides some resilience and believes it is unclear what the additional benefits of a full dual runway airport will be other than increasing flight numbers. It also questions why there is no extra freight infrastructure capacity in the plans to manage predicted increases.
- 1.68.7 Regarding the proposed CARE facility, the Council believes careful consideration should be given to potential adverse impacts on any nearby residents, including on character and features of the landscape and townscape.
- 1.68.8 The Council believes the provisions set out in the National Planning Policy Framework and Environment Act should be considered in relation to landscape and ecology. It suggests Gatwick should be ambitious in its approach to biodiversity net gain.
- 1.68.9 The Council welcomes the commitment to increasing the number of journeys to and from the airport by sustainable transport modes. It suggests providing a frequent direct rail connection via Redhill towards Tonbridge (east/west) and beyond, would start to make the mode-shift target more achievable. It believes the proposed accessibility and connectivity improvements across the

network to encourage modal shift are insufficient and says an assessment is required of how the increased freight to the airport would be managed sustainably.

- 1.68.10 The Council considers the Project should include proposals to improve the availability of public transport in the early morning and late evenings. It suggests that journeys need to be made simpler and more accessible and this should include a 24-hour service from central London to the airport with supporting public transport along stops on the Brighton Main Line.
- 1.68.11 The Council notes that road improvements are restricted to around the airport, but states it is not clear how this relates to Gatwick's ambitions for a more sustainable transport strategy.
- 1.68.12 The Council believes the Construction Management Plan should show suitable batching sites with defined access routes for deliveries to minimise disruption around the airport. It also believes a commitment to sourcing materials locally should be included.
- 1.68.13 The Council considers the noise envelope proposal is flawed as the long term averages do not completely reflect noise annoyance and suggests alternative metrics should be used. It believes that the overflight noise issues occur when aircraft are landing and are vectored over Tunbridge Wells at a height of 3,000-4,000 feet. The Council believes increasing the number of flights will have a negative effect on noise in Tunbridge Wells with more aircraft adding to noise levels and the use of 'stacks'. The Council suggests a system entitled "Point Merge" would be a better option than stacking.
- 1.68.14 The Council acknowledges the early engagement from Gatwick but expresses concern that the consultation documents do not include all relevant details that need to be considered before a decision is made on the proposal. It asks for a clear commitment to ongoing consultation throughout the planning process including more detailed information on a range of matters. The Council says it will engage with Gatwick's future consultations to continue to address its concerns.

1.69 Turners Hill Parish Council

- 1.69.1 Turners Hill Parish Council states that it supports Gatwick as a key part of a sustainable local economy but expresses concern over the credibility of the predicted passenger growth and economic benefits of the Project. It believes the forecasts do not take account of either the impact on existing and future travel from the Covid-19 pandemic or increasing public awareness of climate change. The Parish Council notes that the economic and other benefits are based on the assumption that travel at Gatwick will return to 2019 levels by 2024 and suggests the robustness of the conclusions to this assumption should be tested.
- 1.69.2 The Parish Council believes Gatwick should release the safeguarded land to the south of the main runway, as this would reduce pressure for development land in nearby areas such as Crawley. It considers this would also provide opportunities for tree planting and other measures to improve biodiversity amongst existing ancient woodland to offset some of the negative impacts of the airport. The Council urges Gatwick to engage with local councils and government to explore the wider benefits of releasing the land.
- 1.69.3 The Parish Council thanks Gatwick for various briefings and involvement in local Q&A sessions. However, it suggests Gatwick's engagement with the public was less successful and expresses

disappointment that Turners Hill residents, who experience significant aircraft noise, had to travel to East Grinstead to view the consultation documentation or the Mobile Project Office (MPO). The Parish Council expresses concern at the complexity of the consultation documentation and that MPO staff were unable to answer questions and lacked knowledge of the documents.

1.70 Twineham Parish Council

- 1.70.1 Twineham Parish Council strongly opposes the Project. It believes the local transport infrastructure is inadequate to support it, with east-west routes very poor, either by rail or road.
- 1.70.2 The Parish Council believes new employees will need more housing in the area and this will result in more noise and pollution. It suggests there will be a significant environmental impact, and this will result in the loss of countryside and the rural nature of the area. It also suggests that Gatwick should work with developers to encourage the construction of more low-cost homes in the district.
- 1.70.3 Despite encouragement to use public transport, the Parish Council believes, given the predicted increase of workers, many new employees will drive to the airport in their own vehicles, which will add to traffic congestion and have a significant environmental impact.
- 1.70.4 Concern is expressed about the impact of the proposals on climate change and the Parish Council argues that no increase in air traffic should be undertaken.

1.71 UK Health Security Agency

- 1.71.1 The UK Health Security Agency (UKHSA) expresses support for the proposed noise insulation measures and the population exposure data provided by Gatwick. It states that the variables used in modelling, such as definitions of late-night hours, as well as the noise metrics had been well considered. UKHSA requests more details about how the Noise Insulation Scheme (NIS) will be promoted and how private sector tenants will be supported, particularly those from vulnerable backgrounds.
- 1.71.2 UKSHA says it would welcome clarification of whether homeowners who are exposed to aviation noise at or above 66dB who then experience a further increase due to the northern runway proposals, would also qualify for the assisted moving scheme.
- 1.71.3 UKSHA believes the noise envelope is unlikely to capture all communities adversely affected by noise. It also questions whether new aircraft technology would address aircraft noise for those affected outside the 51dB contour.
- 1.71.4 The UKHSA comments positively on some of the health aspects of the proposals, including:
- the commitment to study a possible increase in demand for local health care services;
 - the inclusion of mental health as indicator in baseline health data;
 - the acknowledgement of links between noise and vibration and mental health conditions;
 - considerations of impacts on vulnerable groups and community severance;
 - cross referencing findings from Equality Impact Assessment (EIA); and
 - the commitment to following Health Impact Assessment methodology during the EIA process.

- 1.71.5 UKHSA expresses support for Gatwick's proposals for new jobs and apprenticeships and the recognition of links between health and work. It recommends further assessments of a potential increase in demand for local health care services due to the influx of a non-home-based construction workforce.
- 1.71.6 UKHSA believes the proposed skills training, new jobs, and apprenticeships should be made available for local people - including young people leaving care and people with disabilities - to enter into sustainable employment. It suggests the Environmental Statement should identify a strategy and action plan that addresses barriers to employment within the local population.
- 1.71.7 UKHSA also states that demand for temporary accommodation by the non-home based workers needs to be identified and further assessment on the impacts on local housing supply and affordability undertaken.
- 1.71.8 UKHSA expresses support for sustainable transport targets but is concerned about the loss or changes to Public Rights of Way, open spaces, and the road network on the grounds that these would undermine access to active travel routes. It believes this could have a detrimental impact on health and safety and suggest that the local active travel infrastructure should be improved.
- 1.71.9 UKHSA states that pollutants associated with traffic and combustion, particularly particulate matter and oxides of nitrogen, are non-threshold and reducing public exposures of these below air quality standards will have potential public health benefits.
- 1.71.10 UKHSA welcomes the commitment to develop a final Code of Construction Practice, along with detailed plans and method statements before scheme construction starts.
- 1.71.11 Support is expressed for the stakeholder engagement undertaken with relevant local authorities, the Civil Aviation Authority, and wider community groups through the Noise Management Board. UKHSA states it expects best practice and best use of technology to ensure updates are shared in a clear, accessible, and meaningful way.

1.72 Warnham Parish Council

- 1.72.1 Warnham Parish Council strongly opposes the northern runway proposals and, although it recognises Gatwick as an important local employer, it believes it is not the right time to be seeking to grow the airport due to climate change. The Parish Council suggests that growing recognition of this and the significant contribution from air travel, make the plans unacceptable.
- 1.72.2 The Parish Council notes that the parish is already affected by three departure routes as well as arrivals from the west and expresses concern about additional noise and air pollution from the two runways operating at peak times. It believes this would significantly impact the health and wellbeing of residents as well as devaluing local property prices. It also expresses concern about increasing CO2 emissions from more planes placed in holding patterns.
- 1.72.3 The Parish Council believes that the size of the development, including new taxiways will significantly impact habitats and local biodiversity. The Parish Council believes the costs relating to mitigating the environmental damage of the scheme are not properly recognised in the proposals.
- 1.72.4 The Parish Council is sceptical about the number of new jobs predicted, pointing towards

increasing automation of many roles including baggage handling and air traffic control in the aviation industry. It also expresses concern that Gatwick is too focused on leisure travel and an over reliance on the airport makes the local economy vulnerable to economic shocks like the Covid-19 pandemic.

- 1.72.5 The Parish Council believes the Project does not make best use of an existing runway, rather than construction of a new runway. It expresses concern about the significant predicted increase in cargo and suggests further facilities outside Gatwick's current footprint would be needed to support this growth. The Parish Council believes additional freight and increased passenger numbers would add significant traffic onto local roads, creating more congestion and pollution, which are not referenced in the consultation documents.
- 1.72.6 The Parish Council believes that poor public transport infrastructure and connections to Gatwick mean greater pressure is likely to be placed on existing local services, amenities and housing as new workers move into the area. It also believes poor rail and bus connections from Warnham Parish makes it unrealistic to expect travellers or workers to cycle or use public transport to get to Gatwick.
- 1.72.7 The Parish Council believes the only transport benefits from the proposals are the road improvements but expresses concern about proposed feeder roads to the airport and that the natural growth of traffic in the Southeast is not considered in Gatwick's plans.
- 1.72.8 The Parish Council expresses concerns about increased traffic and worsening air quality and suggests that Gatwick's plans contradict World Health Organisation guidelines to improve air quality.
- 1.72.9 The Parish Council expresses concern about the lack of detail about carbon emissions and climate change in the consultation documents. The Council believes that decarbonising aviation is some way off and there is currently no viable alternative to fossil fuels. It expresses concern about the predicted increased levels of emissions from more flights and the damage this would cause to the planet.
- 1.72.10 The Parish Council states that its residents would not benefit from the proposed noise envelope or the noise insulation scheme. It is concerned that residents will be affected by the northern runway but will not receive any compensation or insulation. The Council argues that many people live in rural areas to enjoy the outdoors and the effects of aircraft should be recognised in compensation for the full value lost on homes.
- 1.72.11 The Parish Council states that it is very concerned about the airspace modernisation programme and the implications this could have for which flight paths are used and related noise impacts for the parish.
- 1.72.12 The Parish Council expresses concern that there is no mention of the light pollution Gatwick causes from incoming night flights.
- 1.72.13 The Parish Council expresses disappointment about the quality of the public consultation, particularly with the Mobile Project Office, the occupants of which, were unable to answer questions about the scheme. It suggests there was limited publicity about the northern runway proposals and believes that many residents were unaware of the public consultation as they had

understood that Heathrow had been chosen as the site for expansion and growth.

1.73 Waverley Borough Council

- 1.73.1 Waverley Borough Council opposes the Project and believes it would be contrary to the current climate emergency. It believes the use of new technologies as a means of addressing the harmful impacts of flying is some way off.
- 1.73.2 The Council expresses support for the proposed job creation but believes economic growth would be better linked to green industries supporting sustainable transport and reducing the airport's carbon footprint, such as green aviation apprenticeships. It states that the proposals do not provide any benefits to Waverley.
- 1.73.3 The Council queries whether the proposed environmental areas around the airport would be beneficial, particularly one close to the runway where aircraft are likely to disturb wildlife. It also expresses concern about potential disruption to the River Mole ecological corridor by diverting the river.
- 1.73.4 The Council believes the proposals imply that the majority of journeys will continue to be made by car and question the feasibility of encouraging more travel by sustainable modes of transport, given the number of car parking spaces proposed. It believes the airport should work with bus and train operators to provide additional services for staff and passengers to reduce reliance on private car use. It also suggests that Gatwick should work with rail operators to provide a direct and regular service between the airport and Waverley.
- 1.73.5 The Council believes improvements to the local junctions should only be undertaken to accommodate local traffic where there is evidence of need.
- 1.73.6 The Council says the consultation documents do not specify the routes that construction traffic will take and therefore it is difficult to assess impact upon the local road network. It says there is reference to the potential for car parking for construction contractors and a bus terminal however there is no certainty that these facilities will be provided.
- 1.73.7 The Council says it supports the principle of a Carbon and Climate Change Action Plan but is disappointed it is not included in the consultation documents. It suggests that the Plan should include measures to use more sustainable fuels and include storage facilities at the airport.
- 1.73.8 The Council considers the use of noise envelopes to be inappropriate and states that the noise contour plans within the consultation document are difficult to understand due to the lack of local place names and landmarks. The Council says it is difficult to establish what noise impacts will arise from the proposals and it is unclear how the noise envelope will be implemented and enforced. It also expresses concern about how noise mitigation proposals would fit within the airspace modernisation programme.
- 1.73.9 The Council suggests the increased frequency of overflying as a result of the proposals will mean rural communities experiencing greater levels of noise disruption.
- 1.73.10 The Council believes the consultation process was adequate but the northern runway proposals have missed opportunities for a modal shift away from cars and reductions in air traffic, towards greener transportation in line with current climate change challenges.

1.74 Wealden District Council

- 1.74.1 Wealden District Council expresses support for the project on the condition that there are no significant impacts on the quality of life of its residents, designated sites, and protected sites in the district.
- 1.74.2 It welcomes the recognition in the Outline Employment, Skills and Business Strategy (OESBS) that Wealden District forms part of Gatwick Airport's Labour Market Area. It strongly supports the intention in the OESBS to focus skills and employment within the Local Study Area and the wider Labour Market Area. The Council says it would like to work with Gatwick on developing the OESBS to help ensure the potential benefits of the northern runway are felt across the Labour Market Area.
- 1.74.3 To maximise the local employment and skills benefits for the Wealden District, the Council believes improvements to public transport links with Gatwick Airport are critical, for example bus services, so that more rural parts of the Labour Market Area can have an alternative to using the car. It believes better sustainable transport provision within such rural districts may also bring wider benefits to Gatwick Airport in terms of meeting its sustainable travel target. It says it supports Gatwick's commitment to increase use of sustainable transport by 60% by 2030.
- 1.74.4 The Council notes the economic benefits outlined in the technical evidence are not broken down by local authority making it difficult to assess the impact on Wealden district. The Council believes the benefits will be more limited when compared with other authorities with better connections to the airport (particularly those along the Brighton Main Line).
- 1.74.5 Despite its relative proximity to the airport, the Council states that train and bus links are slow and indirect. It believes the project transport modelling indicates that there will be an increase in traffic along the A22 within Wealden and therefore it will be important to ensure that sustainable alternatives to the private motor car are available.
- 1.74.6 The Council supports proposals to work with coach and bus operators to provide an increase in service frequency, including proposals for a new bus route hourly from Uckfield to Gatwick via East Grinstead and any other measures that make it easier for those living in Wealden to access the airport by sustainable modes. It believes any future provision of bus and coach services should take account of shift working patterns at the airport and provide services in the evenings and weekends.
- 1.74.7 The Council supports measures to promote access to the airport by bike via National Route 21 and provide more Electrical Vehicle (EV) Charging Point Infrastructure. The District Council says that it is looking to expand the network of EV charging points across the district, and support for such infrastructure through Gatwick Airport would be beneficial..
- 1.74.8 The Council supports the preparation of a Construction Traffic Management Plan to reduce construction traffic and minimise impacts on the highway network. It believes any measures to reduce traffic through sensitive locations near to Ashdown Forest and along the A22 will be strongly supported.
- 1.74.9 The Council notes the northern runway proposals will result in increased carbon emissions, mainly through additional flights, and believes this is likely to impact negatively on Government

Net Zero targets. It says it would like to see every effort made to reduce emissions and encourages Gatwick and its partners to contribute more broadly to industry wide initiatives to tackle aviation's impact on climate change.

- 1.74.10 The Council supports measures to reduce noise impacts in general, even though the Wealden District is outside of the area where adverse effects on health or quality of life may be felt. The Council supports the implementation of the 'noise envelope'.
- 1.74.11 The Council believes the communities that are in close proximity to Gatwick but may not be materially harmed by aircraft noise should still be considered, particularly in terms of noise disturbance through night flights. It believes the benefit from quieter aircrafts and lowering the noise impacts on surrounding areas should not be compromised by increasing the number of flights. It believes that an appropriate balance should be struck between economic benefits of growth and the possible amenity impacts on nearby communities.
- 1.74.12 The Council welcomes the range of community engagement methods undertaken and the number of means in which information was shared and presented including making documents available within Wealden District at Uckfield and Crowborough. It believes the public consultation process should be sufficiently transparent with the potential and possible impacts on its residents identified. It believes it should be clearly set out in accessible language so that those who wish to engage in the process are able to do so in a meaningful way. The Parish Council believes that a short document summarising the proposals would be helpful in this respect.

1.75 West Hoathly Parish Council

- 1.75.1 West Hoathly Council expresses concern about the potential for increased traffic on the C319 Selsfield Road as well as worsening air, light and noise quality in the parish as a result of the northern runway proposals. It also expresses concern at poor east-west connections and infrastructure and the continued impact this has on traffic on the C319 through West Hoathly Parish.

1.76 West Sussex County Council

- 1.76.1 West Sussex County Council acknowledges the importance of Gatwick Airport but says it cannot support the northern runway proposals due to a number of concerns that need to be satisfactorily addressed. These concerns include passenger forecasts, supporting infrastructure, socio-economic benefits, traffic and transport access, noise and air quality impacts, greenhouse gas emissions, and enhancement measures.
- 1.76.2 The Council expresses concern that insufficient technical detail was provided before the PEIR was published and not enough time made available for council officers to scrutinise the information ahead of public consultation. The Council suggests Gatwick should take advantage of the knowledge and understanding of local authorities to develop its proposals. It states that it will continue to engage with Gatwick to mitigate its concerns and seek the best outcomes for the communities of West Sussex. It believes that Gatwick should now drop plans to pursue a southern runway and release the safeguarded land for alternative uses.
- 1.76.3 Concern is expressed over passenger forecasts and assumptions, with the Council arguing there

is little information to validate the scenarios for capacity with and without the northern runway, potentially undermining the validity of the Gatwick's assessments. The Council questions Gatwick's prediction that the aviation sector will recover from the effects of the pandemic by 2025 and states that no alternative scenarios are set out, including consideration of the expansion at Heathrow Airport. It believes that Gatwick has not demonstrated the need for the northern runway.

- 1.76.4 The Council questions whether the inclusion of new hotels and offices is relevant or directly related to growth and asks Gatwick to clarify why these developments are needed to facilitate the airport expansion.
- 1.76.5 The Council believes the project description lacks detail about elements of the proposals, such as the CARE facility, and further information is needed to understand construction and operational impacts. It believes the construction phasing should be presented clearly to enable local communities and the Council to understand the impacts relevant to them. It requests clarity on the locations for assessment of the large construction compounds to ensure potential impacts are addressed and mitigated.
- 1.76.6 In relation to socio-economics, the County Council is concerned there is no mention of West Sussex County Council's plans and strategies and that there has been no engagement on its economic priorities to inform the PEIR.
- 1.76.7 The Council expresses concern that the baseline data used is outdated and is skewed by key locations in the groupings. It states that, for example, Crawley's demographics are very different to the rest of the local study area. It is also concerned that the geographies used as the 'study area' and 'labour market area' are inconsistent between the various consultation documents.
- 1.76.8 The Council argues that the employment, supply chain and labour market assessment in the PEIR is not comprehensive enough, and does not evidence the types of jobs required, or the qualifications and skills that will be needed. It believes the Outline Employment, Skills and Business Strategy should be introduced regardless of whether the northern runway proposals proceed and that there is a lack of reference to the opportunity for growth around the international visitor economy, which is a strategic priority for many local partners.
- 1.76.9 The Council believes Gatwick's approach to the socio-economic assessments is too simplistic and ignores important areas like affordable housing, housing supply constraints and market signals. In particular, it believes the approach does not take account of the type of employment being generated at the airport and how this translates into different housing needs.
- 1.76.10 The Council queries the exclusion of potential impacts on property values from the assessment, arguing that some properties will experience greater overflight as a result of the northern runway. It calls for contributions from Gatwick towards more social housing and highlights the need for new and improved social and community amenities.
- 1.76.11 The Council states that it is difficult to assess and respond to the economic impact of the proposals based on the information provided in the documents. It believes further assessment and dialogue are needed to understand the full socio-economic impacts of the Project, so additional financial burdens are not placed upon local authorities and their communities.

- 1.76.12 In relation to landscape, townscape and visual resources, the Council is concerned that key viewpoints and visual receptors suggested by stakeholders during the scoping stage have been omitted and that the value of the landscape surrounding the airport has been downplayed. It believes more could be done in terms of mitigation and enhancement proposals, stating that only limited areas will be planted with vegetation and there will be no landscaping to screen development in the short term.
- 1.76.13 Regarding ecology and nature conservation, the Council identifies several concerns, including the need for a broader survey area based on the Zones of Influence, extending surveys of protected species beyond the project site boundary, and investigating air quality impacts on non-designated sites. It believes the 14-year construction programme will result in prolonged impacts on habitats, and says it is not clear if the areas identified for mitigation and enhancement will adequately compensate for the loss. It believes more discussion is needed on the approach to mitigation, compensation, and enhancement measures. The Council believes Gatwick should adopt a voluntary Biodiversity Net Gain (BNG) approach as good practice but says more biodiversity enhancement will be needed to achieve the proposed minimum of 10% BNG.
- 1.76.14 In relation to land-use and recreation, the Council expects an Outline Public Rights of Way Strategy to be implemented to minimise the impact of the northern runway development on users. It states that it does not support permanent closures of public rights of way and expects routes to be accommodated on their legal line or on newly diverted routes. It believes opportunities to improve the local public rights of way network should also be taken, including the possibility of upgrading the Sussex Border Path to a bridleway, which could connect to the proposed road improvement works.
- 1.76.15 The Council believes that plans to create new public space to mitigate the loss of existing areas need to be targeted at communities most affected. It requests more detail about the proposed construction compounds that will be located close to parks and open public spaces.
- 1.76.16 Concern is expressed about the potential traffic and transport impacts. The Council believes the future impacts of the pandemic on the distribution and travel behaviour of staff are unclear. It believes any Network Rail and National Highways schemes that are not fully funded or going through statutory planning processes should be removed from the Project future baseline assessments.
- 1.76.17 The Council states emerging large development sites in the local area need to be taken into account for cumulative assessments, including West of Ifield, Gatwick Green, and Horley Business Park.
- 1.76.18 The Council expresses concern that the proposed mitigation is too focused on provision for cars and not enough on sustainable modes of transport. It believes the active travel plans are limited and that Gatwick is relying solely on bus and coach operators to react to demand rather than proactively identifying investment in public transport. The Council believes the mode share targets are ambitious and states that it is unclear how the Gatwick Mode Choice Model has been developed.
- 1.76.19 The Council notes that any construction works that would require the closure of operation of the airport would take place overnight to minimise disruption. It says it is unclear how this pattern of

working has influenced the assessment of construction traffic impacts and further information is needed to assess the potential impacts. The Council believes the presentation of traffic impacts does not make clear the difference between 2016 and future 'baseline' and 'future with project' conditions and believes this makes it difficult to understand background traffic growth and potential impacts on the highway network.

- 1.76.20 The Council states that the Project will result in significant greenhouse gas emissions, which are contrary to the government's carbon neutral goals. Concern is expressed that Gatwick has not accounted for the recommendations regarding cumulative impacts, arrival flights, non-Kyoto gases, and emissions. It states that several key documents have not been presented for formal consultation, including the Carbon and Climate Change Action Plan.
- 1.76.21 The Council notes that the PEIR assesses four elements of noise and vibration: construction noise, air noise, ground noise, and noise from road traffic, which can have direct effects on health. It states that construction noise is a particular concern to the Council, as a large proportion of works will be undertaken at night for up to 14 years, while the airport continues to operate. It expresses concern about the impact of this on local communities particularly at Charlwood and Horley and believes that mitigation measures must be explored to reduce these impacts.
- 1.76.22 The Council highlights that communities living under flight paths are already affected by air noise and expresses concern that increases in flight numbers will mean even more disturbance. It expresses concern about increasing noise levels for communities in the north of Sussex, which currently have no noise exposure. The Council states that the impact of ground noise remains unclear, and it has concerns that mitigation measures may not be adequate to minimise the impact on quality of life for affected communities.
- 1.76.23 The Council raises concerns over the damage cost calculations presented in the air quality assessment, with the range provided by Gatwick deemed too great. It states that complete modelling data has not been published as part of the PEIR, making it difficult to determine if the modelling is reasonable.
- 1.76.24 The Council states that when the PEIR was published, there was no source apportionment data, meaning it was unclear where the pollution was coming from for example, aircraft road traffic, construction, the CARE facility or wastewater treatment works. It states that following an officer review of the PEIR, Gatwick published the missing evidence, and additional comments may need to be made once officers have reviewed the information.
- 1.76.25 The Council notes that the World Health Organisation (WHO) published revised guidance on ambient air pollution in September 2021, recommending a reduction in the annual average nitrogen dioxide concentration from 40 µg/m³ to 10 µg/m³. It believes this is of significance if the northern runway is progressed, as the average nitrogen dioxide concentration around the airport is around 27 µg/m³.
- 1.76.26 The Council states that no evidence is presented that vulnerable groups, such as the elderly and people with disabilities, have been taken into consideration in Gatwick's plans, despite the risk that they may be more adversely impacted by changes to public spaces and noise levels. It believes more detail is needed about potential impacts on care home residents and schools

within the study area. The Council suggests that an Equality Impact Assessment should be conducted to understand how the northern runway may impact on different groups in the area.

- 1.76.27 The Council believes an assessment of the impact on local health services is needed, given the predicted higher passenger throughput at the airport and the likely increase in demand this could lead to for local health services.
- 1.76.28 The Council is concerned about the potential increase in calls to local fire stations and seeks clarity about whether Gatwick Fire and Rescue Service will continue to operate a domestic appliance and whether the airport's category will remain the same. It also expresses concern about the increased demand for support in the event of a major incident or disaster, which would put higher demands and pressures on acute hospitals, local authorities, and rest centre requirements.
- 1.76.29 The Council expresses concern about the reliance on digital formats and lack of face-to-face meetings with the community during the public consultation period. It states this will be monitored, and any local concerns will be documented for inclusion in the Council's adequacy of consultation response.

1.77 Westerham Town Council

- 1.77.1 Westerham Town Council strongly opposes the northern runway proposals. It believes the case has not been made to justify increased capacity at the current time. It believes that Gatwick's overall capacity is enough to cater for its needs for a significant period of time and there is no need to start an upgrade within the next decade.
- 1.77.2 The Council states that while Westerham gets relatively few flights passing overhead compared to some areas of the south east, the numbers have grown over the years and it does not want to see them grow any more, particularly at night or in the early morning.
- 1.77.3 The Council believes the northern runway proposals could become the precursor to a third runway at Gatwick, as the airport still retains rights over land to the south.
- 1.77.4 The Council questions whether the employment and skills benefits predicted for local people are accurate.
- 1.77.5 The Council believes the proposals will increase road traffic and associated pollution in the local area and will increase noise levels and overall disturbance. It considers plans to mitigate the impacts of the Project are insufficient to compensate for environmental damage.
- 1.77.6 The Council states that it is opposed to Gatwick expanding beyond its current footprint and believes the construction phase will have a significant blighting effect on surrounding land, not just during construction but for many years afterwards. It suggests that the extended development, for example car parking, would be better suited to the south of the airport as this would free up other land around Gatwick to the east and west.
- 1.77.7 The Council believes the proposed road improvements should benefit both road users and local ecology. It suggests the use of cut & cover tunnels for example, are one way to reduce the impact on the environment and communities.
- 1.77.8 The Council considers Gatwick is unlikely to reach its target of 60% sustainable transport use,

primarily due to its location and limited public transport connections. It believes this would not lead to a decrease in the amount of journeys made by "unsustainable" transport, due to the remaining 40% being a much larger number of people getting to the airport using their own cars.

- 1.77.9 The Council does not believe the consultation process was stringent enough given that this proposal would increase noise impacts, an already significant impact for local people.

1.78 Wisborough Green Parish Council

- 1.78.1 Wisborough Green Parish Council strongly opposes the northern runway proposals and believes Gatwick has not put forward a credible need case for the Project.
- 1.78.2 The Parish Council believes there is already surplus passenger and air traffic movement capacity above 2019 levels. It suggests that historically it has taken many years to grow by the amount of spare capacity currently available and believes there is unlikely to be any need for the proposals for many years. In addition, it believes that increasing awareness of climate change means there might never be a need for additional capacity at Gatwick.
- 1.78.3 The Parish Council believes Gatwick's air passenger and air traffic movement forecasts are excessively optimistic and assume sustained levels of growth in the period before and after 2029. In addition, it states that no allowance is made for the impact on air travel of increasing climate awareness.
- 1.78.4 Concern is expressed that the northern runway does not comply with government aviation policy, as it does not demonstrate sufficient need in addition to expansion at Heathrow.
- 1.78.5 The Parish Council considers the presentation of the employment benefits to be misleading. It notes that the Project is not expected to result in material net job creation at the national level and believes it is likely that any local or regional job creation would be by displacement from other regions. It also questions the validity of the assessment of the economic benefits and costs, believing it is based on out-of-date assumptions.
- 1.78.6 The Parish Council expresses concern at the predicted increase of CO2 emissions by almost 50% and believes this would be inconsistent with government policy and have a material impact on the UK's ability to meet carbon reduction targets. It believes it would be unacceptable to allow these increases and associated climate and community impacts to facilitate an increase in mainly leisure travel. It points out that there are presently no proven measures to reduce aviation emission and that the current trajectory to net zero for the aviation industry is unclear.
- 1.78.7 The Parish Council believes growth at Gatwick should be conditional on it achieving a progressive, material reduction in the total climate impacts (including non-CO2 impacts) facilitated by the airport from a 2019 baseline.
- 1.78.8 It expresses concern about the potential noise increases from the northern runway and the consequences for local communities. It believes this is inconsistent with government policy that requires the aviation industry to reduce and mitigate noise as airport capacity grows. The Parish Council also believes Gatwick has made no attempt to share the benefits of future growth in aviation with local communities.
- 1.78.9 The Parish Council expresses concern about the noise envelope proposals and believes it uses

inappropriate metrics and limits, does not comply with government policy, lacks adequate enforcement arrangements and has been put forward without stakeholder discussion, in contravention of CAA guidance. At a minimum it believes that any noise envelope should contain limits on passengers and flights and on the frequency of noise events above specific sound levels using N above metrics and Leq limits. In each case, it believes, the limits should be set at levels that achieve a genuine sharing of benefits as required by government policy.

- 1.78.10 Should consent for the development be granted, the Parish Council believes it should be conditional on some additional measures including:
- A ban on all night flights for a full eight-hour period every night.
 - A noise envelope that has been agreed with local communities and that reduces and mitigates noise as capacity grows and the benefits of growth are shared.
 - Noise, measured on an agreed basis and using a range of metrics, must fall from the actual levels in 2019 and the projected levels in 2029, prior to the commencement of dual runway operations, or the actual levels at that time if that is lower.
 - A progressive and material reduction in the emissions and total climate impacts attributable to the airport, inclusive of emissions from surface transport and full flight impacts, from a 2019 baseline.
 - A legally binding commitment that there would be no further runway, terminal or associated development at Gatwick including no full new runway.
 - No increase in road traffic to the airport, combined with a requirement progressively to reduce the absolute number of passengers, staff accessing the airport by road.

1.79 Withyham Parish Council

- 1.79.1 Withyham Parish Council states that Gatwick Airport is big enough already and opposes the northern runway proposals. It believes the proposals are inconsistent with government policy for reducing CO2 emissions. It also considers that the technology for the advent of hydrogen or electric aircraft is not proven and that the case for additional capacity at Gatwick is overstated.
- 1.79.2 Concern is expressed that no account is taken of the impact of CO2 emission, such as contrails, on global warming. The Parish Council believes recent research has shown that these can have a significant effect on climate change.
- 1.79.3 The Council expresses concern that the noise contours from the airport would increase. It suggests assumptions about the beneficial effect of new aircraft are overstated as noise impact is calculated on average noise levels not noise event frequency. It adds that there is no proposal to mitigate noise by stopping night flights.

1.80 Woodland Trust

- 1.80.1 The Woodland Trust objects to the northern runway proposals due to the potential impact on two areas of ancient woodland known as Horleyland Wood and Lower Picketts Wood. The Trust says further mitigation measures need to be considered to protect these areas and suggest that in their current form, the proposals should be refused in line with the Airports National Policy Statement and the National Planning Policy Framework.

- 1.80.2 The Woodlands Trust expresses concern about the Pentagon Field parking area adjacent to Lower Pickets Wood and the proposed corridor for re-routing foul water pipelines that would be directly adjacent to Horleyland Wood Local Wildlife Site. It says that Natural England has relevant advice available for development near to ancient woodland and that Gatwick should refer to this.
- 1.80.3 The Woodland Trust notes that intensified land use near ancient woodlands makes plant and animal populations more vulnerable to the outside influences from the adjacent land. It highlights several concerns, including noise, light and dust pollution from the construction and operation of the Project; damage to the tree canopy close to the woodlands edge, and the seeping of harmful pollutants and contaminants into the woodland from hard-standing areas and water run-offs.
- 1.80.4 The Trust suggests mitigation measures including a buffer zone of at least 50 metres to Lower Pickett's Wood to avoid potential root damage and the effects of air pollution. It asks for a 15m buffer to be implemented to protect root systems of trees on the edge of Horleyland Wood Local Wildlife Site and recommends that the buffer zones should be planted before construction starts. The Trust also advises that HERA fencing fitted with acoustic and dust screening measures should be used during construction to minimise pollution.
- 1.80.5 The Woodland Trust questions Gatwick's plans for additional car parking as more cars would further contribute to carbon emissions.

1.81 Worth Parish Council

- 1.81.1 Worth Parish Council acknowledges the considerable research that has gone into the northern runway proposals at Gatwick and notes that the majority of take offs will be to the west but with some to the east which could lead to additional environmental impact on the parish. Whilst the Parish Council says it recognises the benefits of additional economic activity likely to be generated by the proposals, it expresses concern about the impact on local housing. It suggests requirements for new employees will exacerbate existing challenges in finding suitable locations for new housing and commercial developments in both Crawley Town Council and Mid Sussex District Council.
- 1.81.2 The Parish Council expresses concern about the development of the area immediately to the west of the M23 which would appear to be for car parking, and the large area of hard surfacing that could lead to both upstream and downstream flooding due to the potential for increased runoff. It believes a full flood risk assessment is required for any development in the area to look at flooding history, flooding impact and potential mitigation measures.
- 1.81.3 The Parish Council notes the proposed improvements to the road network but expresses concerns about the impact of extra traffic on the M23 and in particular through Junction 10 which is within the parish. It says it would like to see proposals to address serious congestion at Junction 10 and problems at Junction 9 caused by the traffic lights requiring southbound traffic to the airport from the M23 to stop for traffic leaving the airport.
- 1.81.4 The Parish Council believes Gatwick should commit to only pursuing growth using the existing main and northern runways, suggesting it release the safeguarded land to the south of the airport for alternative uses which should include the planting of new woodlands to counter the negative environmental impacts of the airport.

2 Summary of Section 42(1)(d) responses by theme

2.1 General comments about the Project

Support for the proposals

- 2.1.1 Some section 42(1)(d) consultees (referred to throughout as persons with an interest in land, or PILs) supported, either outright or in principle, proposals for the Project. Of those, a few have caveats to their support including the need for increased rail capacity, the desire for landing and take-off to operate in both directions and a demonstration that it would not increase pollution.
- 2.1.2 A few PILs also support the development of proposed supporting infrastructure such as car parks, hotels and any required changes to current facilities.
- 2.1.3 The need for additional capacity at Gatwick is a factor that a few PILs raise, commenting that the current runway is close to capacity and that there is a need for future proofing as air travel is likely to grow in the aftermath of the pandemic.
- 2.1.4 A few PILs praise the efficiency and limited environmental impact of using an existing runway and the perceived alignment of this with Government policy. Other reasons that a few PILs provide for their support for the proposals include:
- the cost of the Project;
 - the need for resilience in Gatwick's operations;
 - ongoing increases in sustainability through potential use of Sustainable Aviation Fuel;
 - the reduction of delays;
 - the possibility of Heathrow not constructing a third runway; and
 - support for the convenience of accessing Gatwick compared to other airports.
- 2.1.5 A few PILs say that Gatwick will carry out the Project with suitable environmental mitigation in place and will respect the local community.

Concerns about the proposals

- 2.1.6 Many PILs express opposition towards the Project. Where specific reasons were provided for opposition, these are included below.

Need

- 2.1.7 Many PILs, including those responding as part of the Gatwick Area Conservation Campaign, comment that the proposals are unnecessary as they feel that Gatwick has not demonstrated a need for further runway capacity in line with the Airports National Policy Statement. They comment that there is surplus capacity both at Gatwick and at other UK airports such as Stansted. Some PILs believe the proposals are unnecessary because of the detrimental impacts of Covid-19, Brexit and increasing awareness of climate change on demand for international travel. In addition, a small number of PILs, including those responding as part of the Gatwick Area Conservation Campaign, comment that the prospect of a third runway at Heathrow means the proposals are unnecessary.

- 2.1.8 Rather than being driven by necessity, some PILs believe the motivation for the proposals is a desire to increase profit for the owners and shareholders of Gatwick. A few PILs question not only the necessity of the proposals but also the viability of the aviation sector and of Gatwick as an airport, whilst others comment on the length of time required for construction, saying that this could render the Project redundant.
- 2.1.9 A small number of PILs comment that Gatwick previously had their bid for a second runway refused by the Government in the Airports Commission and express concerns that this is an attempt to gain a second runway by 'stealth'.
- 2.1.10 A few PILs comment on the information about the use of the emergency runway, saying that, as the emergency runway is too close to the main runway to be used safely, Gatwick has misrepresented its proposals as making best use of existing infrastructure, whereas the whole runway would actually have to be realigned.

Assessments

- 2.1.11 A few PILs express concerns about the assessments carried out as part of the Gatwick proposals as they feel there has not been an evidence based environmental assessment, that there are compliance issues within the PEIR and that there is an incorrect distance given between the proposed allocation for Gatwick Green and the DCO boundary.

Cost and funding

- 2.1.12 A few PILs query how Gatwick would manage to finance both the expansion of the airport and their commitments to sustainability as well as querying the source of funding for road upgrades and maintenance. They suggest that the proposals underestimate the cost of the project. Other concerns related to cost that these PILs express are:
- the proposal to introduce higher charges before delivery of new capacity could dissuade passengers from using Gatwick;
 - criticism that taxpayers' money has been used to put forward the proposals; and
 - potential financial impacts to taxpayers and local councils as a result of factors linked to the proposals such as a fall in property values.

Airspace congestion and delays

- 2.1.13 A few PILs express concerns that aircraft delays would worsen rather than improve as they feel that the new runway capacity would not solve the issue of airspace congestion, which would worsen as a result of increased flight numbers. Furthermore, they believe Gatwick's plans do not encourage resilience and that the Time-Based Separation system in use reduces the efficiency of departures and arrivals. Amongst these PILs, there are also suggestions that Gatwick would not be able to achieve the proposed increases in air transport movements or that the lack of certainty about the airspace modernisation programme makes it impossible to know whether the DCO can address the impact on delays accurately.

Safety

- 2.1.14 A few PILs express concerns about safety of the project, either in general terms without further explanation or for the following reasons:

- an increase in road traffic could result in a greater number of accidents;
- potential for terror attacks;
- close proximity of the runways which could lead to emergency manoeuvres;
- lack of emergency runway; and
- the possibility of increased vibration affecting the structural integrity of properties.

Customer experience

- 2.1.15 A few PILs comment that the Project would not improve customer experience at Gatwick. They raise concerns that the layout of Gatwick is confusing for passengers and that this would worsen because of the proposals.

Local communities and businesses

- 2.1.16 Many PILs, including those responding as part of the Gatwick Area Conservation Campaign, express concerns about possible negative impacts of the construction and operation of the northern runway on local communities including:
- disruption;
 - harm to quality of life and wellbeing;
 - increased mental health issues;
 - lack of privacy due to overflight;
 - increased road and rail congestion;
 - changes to the rural character of local villages; and
 - pressure on local infrastructure such as housing.
- 2.1.17 Many PILs, including those responding as part of the Gatwick Area Conservation Campaign, raise specific concerns about the possibility of property devaluation and other effects on properties such as reduced saleability, increased petrol stains and the expansion of parking permit areas with their associated costs. These PILs also comment on the likelihood of direct and indirect impacts of the Project on local businesses, including farms, while a few comment on the close proximity of the Northern Runway to their properties.

Infrastructure

- 2.1.18 Some PILs say that the infrastructure around Gatwick, particularly the road and rail network, is close to capacity and could not cope with growth at the airport. These PILs also comment that they would not want further infrastructure in the local area because of potential impacts on local communities and the environment. A few PILs suggest that Gatwick lacks sufficient infrastructure within the airport to cope with increased passenger numbers such as contact stands in the North Terminal.
- 2.1.19 A few PILs express concerns about foreign ownership of major UK infrastructure.

Environment and health

- 2.1.20 Some PILs, including those responding as part of the Gatwick Area Conservation Campaign, comment that the proposals could negatively impact the local environment. They believe that Gatwick does not sufficiently address this concern and that the mitigation offered is inadequate.
- 2.1.21 Many PILs, including those responding as part of the Gatwick Area Conservation Campaign,

raise concerns about the potential for worsened air quality due to increased aircraft and road traffic movements during the construction and operation of the Northern Runway. They comment that the smell of jet fuel and the presence of dirt falling from aircraft could reduce their quality of life and that air pollution could impact the health of local residents. Particular concern is expressed about possible effects on the health of children, the elderly and those living with conditions such as chronic obstructive pulmonary disease. A few PILs note that an increase in air pollution could pose a risk to the health of their livestock, particularly those who live under flight paths.

- 2.1.22 A few PILs raise concerns that the proposals could worsen light pollution, particularly light pollution from aircraft. Others express concerns about potential impacts on listed buildings such as Hever Castle and on historical burial grounds.

Suggestions about the proposals

Improving existing assets and capacity

- 2.1.23 A few PILs suggest that rather than upgrading the emergency runway to add capacity, Gatwick should focus on recovering from the pandemic, improving efficiency and resilience of existing infrastructure and increasing capacity through improvements to the main runway. Suggestions include renovating the terminals, attracting more long-haul carriers to Gatwick and encouraging airlines to use larger aircraft to reduce the number of trips. Some PILs provide the following suggestions for alternatives to the proposals:
- focus on increasing the number of environmentally friendly aircraft rather than increasing capacity for all aircraft;
 - expand or build alternative airports, particularly those outside of the South East region;
 - reduce air travel, for example by raising the cost, to help tackle carbon emissions;
 - reduce the size of Gatwick or re-purpose it for sustainable projects; and
 - expand the runway towards the west where there are more rural areas rather than to the east which is more populated.

Assessments and delaying expansion

- 2.1.24 A few PILs, including those responding as part of the Gatwick Area Conservation Campaign, request that Gatwick does not expand until it is possible to demonstrate that there would be no detrimental impacts to the environment, including to noise pollution and carbon emissions. They ask for measurement of all impacts from a 2019 baseline to ensure adequate assessment of the cumulative impacts of development.
- 2.1.25 A few PILs request assessment of the impacts of the proposals in the context of cumulative impacts from other local developments to avoid underassessing mitigation. A few PILs, including those responding as part of the Gatwick Area Conservation Campaign, ask that Gatwick publish independent demand forecasts that address a range of scenarios with analysis explaining the assumptions made.

Associated infrastructure and additional capacity

- 2.1.26 A legally binding commitment to not build a third runway and associated development is a suggestion that a few PILs, including those responding as part of the Gatwick Area Conservation

Campaign, put forward.

2.1.27 A few PILs request improved access including safe walking routes and public transport to the airport and station.

2.1.28 A few PILs request that Gatwick incorporate adequate spare capacity to make it easier to recover operations after disruptive events.

2.2 Economic benefits: jobs and skills

Support for the proposals

2.2.1 A small number of PILs respond 'no' to the question of whether Gatwick could do anything more or differently in relation to its economic proposals.

2.2.2 A few PILs express support for the proposals on the grounds that they would lead to job creation as a result of greater economic demand and business growth, with particular reference to increased employment for the local community and the need for post-pandemic recovery. A few PILs also comment favourably on the proposals for training and up-skilling the local workforce, without expanding further.

Concerns about the proposals

2.2.3 A few PILs simply respond 'yes' when asked whether Gatwick could do anything more or differently regarding its proposals.

Misleading information and lack of detail

2.2.4 Some PILs raise doubts about the information included in the consultation documents, stating that the information could be inaccurate or misleading. Some respond through the Gatwick Area Conservation Campaign, stating that Gatwick has failed to show that the Project would have net economic benefits, and a few other respondents say that jobs would be displaced from other regions rather than there being net job creation as a result of the Project. Other comments, from a few respondents each, include:

- an airport's promises to increase jobs are not always realised following a development's approval;
- the documents suggest that Gatwick Green is further away from the DCO boundary than would actually be the case;
- the documents describe potential negative community impacts as being positive impacts;
- job creation estimates may be based on out-of-date information; and
- the positive information included may hide potential negative environmental impacts.

2.2.5 A few PILs claim that there is a lack of detail in the proposals, including on the:

- airport's wider expansion plan;
- potential mitigation outlined in the Outline Employment, Skills and Business Support Strategy;
- nature of jobs to be created; and
- extent of planning for any increased demand for housing.

Need for the Project

2.2.6 A few PILs raise doubts over the necessity of the Project, on the grounds that a reduction in air travel as a result of the pandemic means that there may not be the need for increased jobs and that local communities generally do not require the proposals. Some PILs state that there are already high employment rates both locally and nationally, which would make it difficult to find new workers for the airport. These PILs say that there are existing unfilled posts at the airport, and that the proposals would not bring any benefit to the area.

2.2.7 A similar number of PILs state that the impacts of the Project would outweigh its proposed benefits, on the grounds that increased employment would not outweigh the impact of increased flights and the potential disruption that the Project could have.

Employment

2.2.8 A few PILs express concern about the rise of automation in the aviation industry, on the grounds that Gatwick's use of machine technology for baggage handling and air control would reduce the potential for job creation.

2.2.9 A similar number of PILs raise doubts over the nature of the jobs that the proposals would create, stating that the majority of jobs would be low-skilled, would be insecure in the event of future consumer behaviour changes due to environmental or pandemic-related reasons, or would be short-term construction jobs.

2.2.10 A few PILs express concern about the treatment of airport staff, claiming that Gatwick does not have a positive track record regarding treatment of staff and small businesses, and that Gatwick would be more likely to increase the workload of existing staff than hire new staff, in order to increase profits.

2.2.11 A similar number of PILs raise doubts over the viability of Gatwick's job creation proposals, on the grounds that:

- Gatwick is over-reliant on EasyJet, which could make Gatwick, and therefore the local economy, vulnerable if EasyJet decreases its presence;
- many people laid off by the airport during the pandemic would have found jobs elsewhere, and thus would not be available for re-hire;
- the additional land necessary to meet Gatwick's proposed increase in jobs is not available;
- many workers would come from outside the local area, and therefore there would be minimal benefits to the local economy; and
- local businesses are already struggling to fill low-skilled jobs, raising doubts over the airport's ability to hire its expected number of workers.

2.2.12 Finally, a few PILs raise concerns that the Project would encourage the local economy to be reliant on Gatwick as its single employer, which they say is a flawed approach if the airport is shut down due to another pandemic, oil crisis, or growing awareness of climate change.

Local communities and services

2.2.13 Some PILs comment on the potential negative impact that the Project would have on local infrastructure and services, on the grounds that:

- the road network is already over-crowded, even without an increase in workers;
- there is insufficient housing, educational, and healthcare infrastructure for an increasing

workforce due to existing services being at capacity, and that the housing created would be too expensive for new airport workers;

- an increase in workers would lead to more traffic, causing greater pollution and wearing down the road infrastructure; and
- attempting to meet this increased demand would impact negatively on the environment by building on green spaces and creating extra pressure on water resources.

2.2.14 A small number of PILs express concern about the impact that the Project may have on employment in other areas, with responses through the Gatwick Area Conservation Campaign stating that the jobs created would likely be displaced from other regions, undermining the Government's 'Levelling Up' agenda. Other concerns include that expansion at Gatwick would take away from existing local business; that high-paid, low-skill jobs would undermine other industries with lower wages; and that job creation would take skilled employees away from employers who need workers.

2.2.15 Concerns raised by a few other respondents include:

- increases in employment would not outweigh the potential negative impacts of increased traffic and congestion in the area;
- increases in employment would not outweigh potential negative impacts on health from an increase in flights in the area;
- the Project would negatively impact local communities, including their quality of life; and
- the encouragement of more workers to the area would create a higher population density, leading to overcrowding and housing shortages.

Environment

2.2.16 A few PILs express concern about the potential impact that the Project's economic proposals could have on the environment, including that:

- workers commuting from outside the local area would lead to an increase in air pollution;
- minimal economic benefits are outweighed by the potential negative impacts of the Project on the climate, as well as increased noise pollution;
- the local area should be encouraging more green businesses instead; and
- the required additional housing would be built on green-belt land, leading to urban sprawl.

Suggestions about the proposals

Green industries

2.2.17 A few PILs suggest that jobs in green industries should be prioritised over airport expansion. This includes comments that:

- the green sector has greater potential for secure, long-term employment, instead of the low-skilled jobs created by Gatwick's expansion;
- green industries would be better to invest in than those causing environmental damage, including the aviation industry;
- apprenticeships in green industries should be promoted to help achieve net zero;
- a reduction in air travel and focus on green initiatives would better protect the planet and ensure it remains inhabitable;

- Gatwick should follow other global airports focusing on green issues, prioritising these before considering expansion; and
- Gatwick could work with the UK's wider ground transport system and re-train those laid-off in the pandemic in green jobs to become a world leader in sustainability.

Employment and skills

- 2.2.18 A few PILs state that employment growth should be prioritised in alternative locations to the airport, on the grounds that regions other than the South East are in greater need of improved employment and skills opportunities, and that the Project goes against the Government's 'Levelling Up' agenda.
- 2.2.19 Suggestions regarding training and upskilling programmes are made by a few PILs. Comments include that:
- local workers employed in construction should be re-skilled for jobs in the operation and management phase;
 - appropriate skills training is made available to employ a diverse range of people;
 - those initially unsuited to airport employment should be trained;
 - flexible further education models should be offered to promote accessibility;
 - training in sustainable services required by the airport should be offered; and
 - such opportunities should be made available to communities in the area and in the wider region.
- 2.2.20 Specific comments about provision of more apprenticeships, training, and work placements are made by a similar number of PILs. These PILs say that any construction company delivering the Project should have to commit to such provision, that work experience should be offered to airport staff to learn more about airport operations, and that a skills and recruitment strategy should be introduced to ensure access to indirect job opportunities created by the Project.
- 2.2.21 A few PILs make specific suggestions regarding the nature of airport employment, including that flexibility in work should be introduced, as early shifts are not accessible for everyone and suggest that this would enable local residents with families to access employment opportunities or create opportunities for car sharing. A few others suggest that Gatwick focus on creating long-term job opportunities, rather than the majority of those created being during the construction phase. PILs also say that improvements to employment opportunities could be improved through partnership with the long-distanced scheduled coach sector.
- 2.2.22 Diversification of the local economy is also suggested by a few PILs, on the grounds that the local area is already too dependent on the airport and therefore focus should instead be on having a range of employers locally, rather than having a continued reliance on Gatwick.
- 2.2.23 A few PILs suggest that Gatwick employ specific groups or demographics, with particular reference to the involvement of small businesses, voluntary, and charitable organisations, on the grounds that these would bring social value to the local economy. A few others suggest that Gatwick prioritise employment of local people, both for fixed-term employment and permanent roles during the operational and management phase.
- 2.2.24 Finally, a similar number state that Gatwick should more strongly assess the skills that will be

needed for the Project and how it will access them, particularly in light of Brexit and the reduction of lower-skilled workers seeking employment.

2.2.25 Other suggestions by a few PILs each include comments that:

- Gatwick should focus on hiring those currently not employed, by maintaining current job levels and reducing the number that are automated;
- Gatwick should focus on post-pandemic recovery and returning the airport to its previous capacity, rather than expanding, including re-employing staff furloughed during the pandemic;
- following construction, workers should be taught the skills to support sustainability and a transition to a low-emission airport;
- employment should be prioritised in industries other than travel, with particular reference to training people to work in the NHS and care homes;
- funds for the Project should instead be used to reopen the South Terminal and improve its existing facilities, on the grounds that jobs could be created through front of house staff, shopping facilities, and other new amenities;
- additional land would be required to accommodate the new jobs created by the airport, such as for offices and warehouses, and therefore Gatwick should identify suitable land and how it will be allocated as soon as possible, such as L&G's land to the north; and
- Gatwick and its supply chain should introduce a diversity initiative to ensure those traditionally excluded from work can have access to employment, which in turn will improve diversity and cultural inclusion across the local economy.

Local communities

2.2.26 A few PILs make suggestions about benefits to the local community, including that:

- the airport working environment should be improved;
- there should be a greater focus on supporting local residents impacted by the Project, whether through compensation or compulsory purchase orders;
- sustainable housing should be introduced instead of using local greenbelt land; and
- local residents should be employed, on the grounds that the pandemic has negatively impacted the local area.

Further information

2.2.27 A few PILs request further information about the Project, including on how projected employment figures would be achieved, the proportion of jobs created that would be low-skilled, and the extent of new workers' access to community services such as housing, education, and healthcare. A few PILs say that greater clarity is needed as to whether new housing developments would be required or if new workers would be expected to live further from, and travel greater distances to, Gatwick.

2.3 Economic benefits: business and the economy

Support for the proposals

2.3.1 A small number of PILs say that Gatwick could not do anything more, or differently, regarding its proposals, while a few PILs express general support for the proposals, without expanding further.

Post-pandemic economic recovery

2.3.2 A few PILs comment favourably on the potential for the proposals to contribute to a post-pandemic economic recovery on a local, regional, and national level. These PILs state that increasing the airport's capacity would ensure that Gatwick itself is profitable, as well as encouraging business growth, bringing greater economic resilience and stability.

Local, regional, and national economic benefits

2.3.3 A few PILs say that the proposals would:

- offer supply chain opportunities to local businesses;
- encourage greater industrial and commercial growth in the Gatwick Diamond Area;
- enhance tourism, encouraging greater retail and leisure expenditure; and
- encourage economic stability.

2.3.4 References to potential regional economic benefits are also made by a few PILs. These PILs say that the Project could:

- promote inter-regional connectivity in line with the Government's 'Levelling Up' agenda;
- support future growth in low-emissions aviation;
- encourage greater tourism through increased capacity; and
- support economic stability across the South East region.

2.3.5 A similar number of PILs discuss the more general economic benefits that the Project could bring. These PILs state that the increased capacity of the airport could bring local, regional, and national economic benefits, through improved international connectivity, encouragement of tourism, and greater employment and inward investment.

Support with caveats

2.3.6 Finally, a few PILs support the Project with caveats, in particular saying that expansion is welcomed as long as it remains within the airport's existing perimeter.

Concerns about the proposals

2.3.7 A few PILs state in simple terms that Gatwick could do something more, or differently, regarding its proposals, without providing any further comment.

Misleading or inaccurate information

2.3.8 A small number of PILs, including PILs who responded via the Gatwick Area Conservation Campaign, are concerned about potentially misleading or inaccurate information contained in the assessments, stating that the proposals are based on out-of-date information. These respondents say that this undermines the credibility of the cost-benefit analysis, that Gatwick has incorrectly assumed that the pandemic will not have a long-term impact on passenger demand, and that it has not successfully demonstrated that the Project would have economic benefits.

2.3.9 Other PILs responding independently of the campaign comment that:

- the proposals may contain incorrect information regarding the proposed economic gains of the Project;
- the proposals have not considered whether developments in virtual technology will reduce

- the need for business travel;
- increasing concerns about fossil fuel use may lead to a reduction in their use, which would in turn reduce the likely economic contribution of the airport; and
- the distance between the Development Consent Order (DCO) boundary and the proposed Gatwick Green development has been incorrectly calculated, with the latter not fully considered in the proposals.

Local economy

2.3.10 Concerns over potential impacts on businesses and the economy are expressed by a few PILs, on the grounds that the proposals may benefit larger corporations rather than local businesses and would reduce ease of transport through the local area, which would further undermine local businesses. Concerns are also voiced over the potential for the Project to be undertaken at the expense of other commercial projects that may lead to greater growth and economic resilience, and that the Project would take skilled employees away from existing industries that cannot afford to pay its workers as much, such as the care sector. PILs also say that the expanded airport would:

- affect nearby offices and work environments;
- have a negative impact on the proposed Gatwick Green development by undermining its surrounding environment;
- increase outbound tourism at the expense of the UK economy;
- undermine wider economic recovery by encouraging financial reliance on the airport; and
- undermine the aviation sector by not allowing smaller airlines to access the airport and expecting existing airlines to cope with the increased passenger demand.

2.3.11 A few PILs raise concerns that the Project may be motivated by economic considerations, on the grounds that the proposals would only benefit Gatwick or those who are already wealthy.

2.3.12 A few PILs express concerns over the effectiveness of the proposals, on the grounds that the aviation industry can be volatile and that the proposed economic benefits may not therefore be guaranteed, that passengers may be more likely to use local airports regardless of Gatwick's expansion, and that businesses would not benefit from the proposals.

2.3.13 A few PILs express concern that Gatwick's economic proposals are dependent on approval of the Northern Runway Project, and therefore would not be implemented if the Project is not approved.

Need

2.3.14 A similar number of PILs express doubt about the necessity of the proposals, on the grounds that:

- Gatwick is already at an appropriate size;
- there are already sufficient businesses in proximity to the airport, meaning that the Project is locally and regionally unnecessary; and
- business travel may decrease significantly due to increasing awareness of climate change.

Environment

2.3.15 A few PILs raise general concerns over the impact that the proposals would have on the environment, including through an associated increase in greenhouse gas emissions. These PILs state that economic gain should not occur at the expense of the local and global environment,

adding that if climate change is not addressed, there will be no economy to benefit from the proposals.

Local communities

- 2.3.16 A few PILs raise concerns over the potential impact that the proposals would have on the local community. They state that the proposed economic benefits would not outweigh the potential noise and pollution resulting from an increase in traffic, and that this in turn would undermine local residents' quality of life and local property prices. Others say that the economic benefits would not trickle down to the local community, that Gatwick does not have a proven history of supporting local communities and amenities, and that local authorities currently lack plans to capitalise on proposed economic benefits.
- 2.3.17 Concerns over noise pollution are expressed by a few PILs, on the grounds that the proposed economic benefits would not offset the effect on local communities of any increase in noise. Finally, a few PILs state that there would be limited to no economic benefit for local communities as a result of the Project. They comment that a return to pre-pandemic levels would not benefit the local community and that local businesses would not benefit from the scheme.

Suggestions about the proposals

General

- 2.3.18 A few PILs suggest that Gatwick undertake additional assessments to improve its proposals. They recommend the use of online tools in the airport supply chain to better assess the material impact of Gatwick's spending, as this would facilitate evaluation of its current legacy and impact during construction and operational phases. A few others suggest the use of social value calculators to analyse the social impact of Gatwick's operations, and that Gatwick should set objectives, measures, and targets to ensure that its investment in local communities reflects both its own needs and that of the Project.

Alternative approaches

- 2.3.19 A few PILs suggest that Gatwick use the funds for the Project on green initiatives instead. They say that reaching net zero should be the airport's priority, and that this can be achieved by employing a large team to identify and implement changes to the existing business to make it more sustainable before any expansion is considered. A few PILs also suggest greater incentives to 'go greener' including working with airlines to ensure that no plane takes off until it is loaded sufficiently, to reduce the number of aircraft in the sky and the need for additional runway capacity.
- 2.3.20 A focus on economic improvements in alternative locations is suggested by a few PILs. Comments include generally spreading economic benefits across the UK rather than solely in the South East region, expanding air travel in other regional airports, or building an airport off the south coast. A few other PILs suggest opening an airport in an alternative location that has the infrastructure to accommodate the traffic and pollution associated with the Project.
- 2.3.21 A similar number of PILs suggest prioritising non-airport employment instead, including jobs outside of the aviation industry; green, sustainable jobs and apprenticeships; and employment in industries supporting a reduction in global warming.

2.3.22 Finally, a few PILs suggest that the number of flights must be reduced and not increased. They state that a decrease in air travel would benefit society, business, and the economy, and that air travel should not be continued as a mode of affordable travel or as a means of transporting freight.

Local and national economy

2.3.23 A few PILs suggest that the local economy must be diversified to prevent over-reliance on Gatwick. They say that greater employment and business options should be introduced, and that Gatwick's dominance in the local economy undermines local economic resilience and possible opportunities for other local businesses to thrive.

2.3.24 A similar number of PILs recommend that Gatwick prioritise the use of local businesses and provide procurement opportunities beyond statements in the consultation documents. They also say that it should consult with local businesses to better meet their needs, and that local businesses may have innovative suggestions to improve the proposals.

2.3.25 The airport's fees and contributions to taxation are commented on by a few PILs. They say that Gatwick should:

- increase landing fees to ensure that the airport benefits everyone;
- fund the expansion by share capital and then put taxes back into the UK economy; and
- recognise that prices for travel must increase, but that this can ensure good quality travel and create more employment opportunities.

2.3.26 A few other PILs say that there must be no increase, or a reduction, in airport charges, as airlines are struggling as a result of the pandemic.

Local community

2.3.27 A few PILs suggest that Gatwick should focus on improvements to the local community, with particular reference to investment in local infrastructure beyond Crawley to towns like Horley. A few of these PILs also say that infrastructure needs to be updated to support the influx of new workers in local towns, including through upgraded schools, roads, shops, and reliable transport links. A few other PILs recommend that local government should invest in local regeneration to encourage new workers to live locally and attract tourists to support local retail and hospitality industries. A few PILs also suggest that homeowners be compensated for any impact that the Project would have on property prices.

Airport infrastructure and land use

2.3.28 A few PILs make suggestions regarding the use of airport facilities, including that:

- Airport facilities should be used more efficiently;
- terminal buildings should be redeveloped to attract additional airlines;
- green belt land is not used for additional building work; and
- appropriate infrastructure is installed to serve the airport's needs, including water, electricity, and sewage supplies.

2.3.29 Other suggestions, made by a few PILs each, include to:

- make use of the existing emergency runway during off-peak hours, such as in the afternoon;

- improve transport infrastructure to support the airport, local businesses and residents; and
- use currently protected land for more sustainable business use.

Further information

2.3.30 A few PILs also request further information about the proposals, with particular reference to the cost associated with the Project.

2.4 Airport supporting facilities

Support for the proposals

CARE facility – Option 1

2.4.1 One PIL expresses support for this option, saying that the location of the CARE facility should be determined by which site would have the least impact on the local community.

CARE facility - Option 2

2.4.2 One PIL expresses support for this option, saying that Option 2 would have less impact on the local community, adding that Gatwick's assistance for local residents and businesses would increase local support for the proposals.

Overall comments

2.4.3 A few PILs comment positively on the proposals in general terms, arguing that the facilities are necessary for airport expansion, or noting that infrastructure within the existing airport boundary should not affect local residents.

Concern about the proposals

2.4.4 A small number of PILs oppose the proposals, either because development to the northwest of the airport would impact on their property, or because they oppose the Project.

2.4.5 Some PILs express concern about the proposals, with a small number commenting specifically on the potential impacts that the CARE facility might have on the environment and local community, including heritage buildings and the transport network. These respondents say that noise, air quality and greenhouse gas emissions are areas of particular concern, and that improving the current CARE facility would be better for the environment than moving the facility to a new site.

2.4.6 A few PILs say that the proposals lack detail, including as to the level of recycling that Gatwick undertakes, as well as the potential impacts of the CARE facility on the locality. Other comments include that:

- Gatwick is not being honest about the impact of the proposed works;
- the public does not have an opinion as to where the CARE facility should be located;
- the airport is spreading unnecessarily beyond its current boundary;
- Gatwick has never been a cargo hub, and should not seek to become one; or
- to move the CARE facility would mean that facilities near its current location would not benefit by way of waste disposal and heating, which respondents say was intended to happen.

Suggestions about the proposals

- A few PILS offer suggestions about the proposals, including that:
- Gatwick should assess how the proposals would affect airport operations;
- security considerations should be prioritised in making a decision on the location of the CARE facility;
- a materials management strategy should be put in place, based on principles of a circular economy;
- it would be more environmentally friendly to improve the existing facility as opposed to relocating it;
- the CARE facility should be moved to the south of the airport, as this would mean it would be close to fewer houses;
- the CARE facility could be integrated with local recycling; and
- the CARE facility should be moved closer to the airport boundary to allow appropriate technologies to be used.

2.4.7 A few PILs request information, including:

- how much of an increase there would be in use of the CARE facility as passenger numbers increase, and what the impact on air quality would be; and
- whether recycled materials are processed on-site or shipped elsewhere, and, if the materials are shipped, whether a local facility is used.

2.5 [Landscape and ecology](#)

Support for the proposals

2.5.1 A small number of PILs support the proposals for landscape and ecology, most of whom do so in general terms, saying for example that the proposals are 'reasonable' or 'good'. A few PILs include additional comments, saying that the proposals will balance ecological needs against development, and that it is reasonable to believe that the development of Pentagon Field would not change the wider character area, as it is adjacent to the proposed Gatwick Green development. A few support the PEIR's conclusion that the land around the airport is of regional importance and that the land to the north and west is of national significance.

Concerns about the proposals

2.5.2 A few PILs express general opposition to the proposals on the grounds that they oppose the Project.

[Local ecology and biodiversity](#)

2.5.3 Some PILs express concern about the potential impact of the Project on local ecology and biodiversity, due to land take and the removal of green space at Gatwick, as well as land take at sites elsewhere where bio-fuels may be grown. These PILs say that ancient woodland and veteran trees would be lost, and that local habitat connectivity would be severed. They refer to the possible impact of the Project on:

- peregrine falcons, skylarks, reed warblers, swifts, house martins, swallows, and migrating birds generally;

- bats, including rare species;
- badgers;
- nocturnal animals; and
- moths and other insects.

2.5.4 Places that PILs say would be affected include:

- habitat along the River Mole to the northwest of the airport;
- ancient semi-natural woodland within or adjacent to the airport, including Rowley Wood, Huntsgreen Wood, Horleyland Wood, Allen's Wood, Black Corner Wood, Lower Picketts Wood and the unnamed wood at TQ2955640750; and
- wooded areas and a conservation area in the ward of Charlwood.

2.5.5 A few PILs also express concerns in relation to the PEIR more specifically, including its lack of detail on bat surveys undertaken in 2019 and their significant findings, that proposals to create a new artificial badger sett do not provide details on its location or design, and that the PEIR fails to recognise the significant impact that the closure of a sett would have on the badger social group.

Air quality

2.5.6 A similar number of PILs express specific concern about a possible deterioration in air quality as a result of the Project, with reference to how this might affect local residents, habitats and wildlife.

Landscape and visual impacts

2.5.7 Regarding potential landscape and visual impact, some PILs say that the rural character of the area would be affected by the removal of open space and vegetation, and the increased development of the airport, including the CARE facility. Other related concerns include: that there would be an increase in fly-tipping, and that there would be an increase in house-building in the area as a result of the Project.

Mitigation

2.5.8 Some PILs say that the proposals would not be effective in mitigating any environmental and visual impacts on the area. These PILs argue that the impacts of the Project would outweigh any benefits. They believe that Gatwick's mitigation proposals would not be implemented or say that mitigation of an airport's impacts is not possible, sometimes saying that Gatwick is 'greenwashing' its proposals.

Flooding

2.5.9 A small number of PILs say that the proposals, including the increase in hard-standing areas, could affect water run-off, leading to a greater flood risk in the area. These PILs say that:

- flooding is already a problem in the area, including on the River Mole and Gatwick Stream;
- water run-off could lead to the introduction of pollutants into the woodland; and
- Gatwick has admitted that major flood defences would be required, including diverting the River Mole and disposing of water.

Noise

2.5.10 Regarding potential noise impact, a small number of PILs say that local people and habitats will be subject to increased noise from the construction and operational phases of the Project, often

expressing scepticism about the effectiveness of any mitigation that would be put in place.

Property and amenities

2.5.11 A few PILs say that local communities would be affected by the Project, in terms of loss of amenities, as well as a potential reduction in property prices. Places that PILs say would be affected include:

- Horley, particularly the loss of green space at Church Meadows;
- southern villages in Dorking Rural County Electoral District, including heritage assets in Charlwood Ward;
- Riverside Garden Park;
- Lingfield; and
- public open space and footpaths generally.

Assessments undertaken

2.5.12 Comments on the assessments undertaken include that:

- the badger survey did not include any camera monitoring of setts, and the classification of setts only used field signs;
- an incorrect distance has been shown between the proposed development boundary and the proposed Gatwick Green development;
- the EIA has not included Gatwick Green as a cumulative scheme, which means that impacts not may not have been fully assessed, and that sufficient mitigation measures may not have been proposed; and
- it is not clear what it means to 'improve' the landscape, or what the impacts of the Project may be.

Other issues

2.5.13 Other issues raised by a few PILs include that the Project would:

- give rise to increased light pollution;
- give rise to increased greenhouse gas emissions;
- disturb AONBs and sites within them, such as Hever Castle;
- create dangerous conditions for walkers, cyclists and horse-riders, including children; and
- lead to the reduction of canopy in cases where trees at the wood edge overhang public space and need to be cut back or felled.

Suggestions about the proposals

2.5.14 Some PILs provide suggestions about the proposals, with a few saying that open spaces should be retained or created, the environment protected, and restoration undertaken. Specific ecological suggestions include to:

- put in place buffer zones and other measures to mitigate potential environmental damage;
- make use of environmental expertise and heed guidance from stakeholders such as Natural England;
- put in place ecological projects such as living walls to assist in air quality and temperature management, as well as alleviate the visual impact of the Project;

- redevelop Riverside Garden Park;
- sponsor open spaces elsewhere in the country; and
- put in place these proposals without expanding the airport.

2.5.15 Other suggestions include keeping footpaths maintained and allowing fishing in the proposed water retention ponds.

2.5.16 A few PILs request information about the proposals, including:

- whether Gatwick will communicate with local residents about air quality;
- whether any entity would oversee the implementation of the proposals, and what penalties might be put in place for non-compliance; and
- whether more detail can be provided about how the proposals might affect the River Mole, in terms of its rerouting and flood alleviation.

2.5.17 A few PILs make specific suggestions regarding the PEIR, including publishing Ecology Consultancy reports to provide transparency.

2.6 Land use

Support for the proposals

2.6.1 A small number of PILs express support for the proposals, with a few doing so in general terms. A few PILs express support for the proposed use of land, and a similar number of PILs claim that nearby developments, such as Gatwick Green, could support the recovery of Gatwick Airport. Similarly, a smaller number of PILs feel that the development would create growth, which they say would in turn benefit the local community. A few PILs speak positively about the plans to restore land to its previous use.

2.6.2 A few PILs state their conditional support for the proposals, saying that they support the land use plans but feel that the proposed recycling and energy infrastructure could be improved. A similar number of PILs support the proposals only if trees are not cut down.

Concerns about the proposals

Opposition

2.6.3 A small number of PILs object to the proposed use of land, expressing their objection in general terms, while a few PILs object specifically to the temporary use of land.

Land take

2.6.4 Some PILs express concerns about the proposed land take, with a small number doing so in general terms. A few of these PILs say that the land take would cause disruption to local residents, would prevent land being used for other purposes, and could have environmental impacts, including increased flooding.

2.6.5 A few PILs voice concerns about the inefficient use of land and claim that the proposals might inhibit flexibility in responding to growth in the area, for example by undertaking further development. These PILs raise concerns about the inclusion of land for commercial purposes in the proposals for land use, which they say could prevent land being used more efficiently. A similar number raise concerns about the effect of land take on the wider development of the local

area, including Gatwick Green and Horley Business Park. A few PILs feel that the scope of the commercial uses fall outside of what is appropriate for inclusion in a DCO application.

- 2.6.6 Responding mostly via the Gatwick Area Conservation Campaign, a few PILs feel that the balancing pond would be unnecessary if an increase in road traffic could be avoided through the development of public transportation infrastructure. A few PILs also feel that the land take for car parking from Crawley Local Plan's Gatwick Green site could be unnecessary if public transport was better utilised.
- 2.6.7 A few PILs also raise concerns about the effect of land take on local landowners, particularly those whose land provides employment for local residents. A similar number raise concerns about the reduction of green buffers and how close the new boundary would be to residents.
- 2.6.8 A few PILs express concern about the potential impact of the Project on historic sites, such as St Bartholomew's Church and Ye Olde Six Bells pub. A similar number raise concerns about land take associated with the M23 spur road east of Junction 9a, particularly from land forming part of Dovenby Hall. A few PILs feel that insufficient information has been provided about land take in this area, including the rationale for requiring this land.

Effect on people and communities

- 2.6.9 A small number of PILs raise concerns about the possible impact of the proposals on local people and communities, with a few doing so in general terms. A few PILs raise specific concerns about traffic disruption and increased congestion, both during construction and operational phases. Similarly, a few PILs note that the proposal could increase demand on local public transport and on-street parking. Additionally, a few PILs raise concerns about noise pollution and the effect this would have on local communities. A few other PILs say that it would be difficult to minimise disruption to local communities.

Environment

- 2.6.10 A small number of PILs are concerned about how the proposals might impact on the environment, including in terms of noise and air quality. These PILs claim that noise and air pollution are already too high in the area. A few PILs say that residents might be subject to an increased risk of flooding as a result of the Project and other developments in the area, such as the widening of the M23 and the construction of additional housing. A few PILs feel that the proposal would have a detrimental ecological effect, and a similar number are concerned that land restoration would be difficult or impossible.

Design

- 2.6.11 A few PILs raise concerns about the design of the proposals. A few, responding via the Gatwick Area Conservation Campaign, raise concerns that the plans for the development of hotel and office space are unnecessary and do not justify the loss of car parking space. A few of these say that there is existing unused office space that could be utilised instead. A few PILs are concerned that the current proposals do not include plans for additional infrastructure to support any increase in workforce, including housing and schools. A similar number express concerns about the use of a bus shuttle to access Pier 7, arguing that this will lead to a poor customer experience.

Lack of detail

- 2.6.12 A few PILs say that the proposals are lacking in detail or are missing information. These PILs say that it is not clear which areas of land are proposed for temporary use or permanent use. A few PILs feel that there is inadequate justification for the inclusion of associated development. Similarly, a few PILs feel that it is not always clear why land has been included in the land take for the Project. A few other PILs feel that more information about the boundary or the land being used could be provided.
- 2.6.13 A few PILs claim that the Project has been misrepresented, and that the proposals represent a more significant development than initially implied. A few of these PILs object to the description of the Project as 'minor'.

Suggestions about the proposals

Environment

- 2.6.14 A small number of PILs make suggestions relating to the environmental impacts of the development. A few of these PILs suggest that use of public transport by passengers could reduce the amount of additional hardstanding required and so reduce the risk of flooding. A few PILs specifically request the completion of an Environmental Impact Assessment. A few other PILs say that insights from climate change modelling should be incorporated into the planned use of land. A similar number of PILs suggest using land restoration to improve the environment, while also ensuring that contaminated waste soil is not used to restore land.

Land use

- 2.6.15 A few PILs suggest reviewing the proposed land use to ensure that only the minimum required land is being used, particularly in relation to the M23 spur at Junction 9a. Conversely, other PILs suggest increasing the land take to ensure that the full benefits of the proposed development are realised. A few of these PILs suggest working with landowners to acquire more land for future use.

Involving stakeholders

- 2.6.16 A few PILs make suggestions about listening to or working with stakeholders more closely. This includes developing ongoing, collaborative working relationships with a range of authorities to facilitate the ongoing development of land to support employment growth in the area.

Design and land use

- 2.6.17 A few PILs make suggestions that relate to the design of the development, including suggesting that safeguarded land that is not required for the proposed development should be developed for other purposes to benefit the local community, including land east of Balcombe Road, for example. A few PILs suggest that Gatwick should give additional thought to the development of cycling routes to the airport.

Further information

- 2.6.18 A few PILs request additional information, including about the Project boundary and the rationale behind land take. A similar number of PILs request more precise information about timescales, projected increases in traffic, and what land might be needed to accommodate future growth.

2.7 Getting to and from the airport

Support for the proposals

- 2.7.1 A few PILs stated that they did not feel there were any improvements that could be made to the proposals.
- 2.7.2 More detailed support for the proposals is expressed by a few PILs on the grounds that the plans would improve general access to the airport. A few PILs comment that the scheme would improve public transport access and would therefore also make the Project more sustainable by reducing carbon emissions.

Concerns about the proposals

General

- 2.7.3 A few PILs express concern that the proposals lack detail, including in relation to the Gatwick Mode Choice Model, the transport strategy, the question of how improvements would be achieved, and any justifications for an increase in car parking spaces.
- 2.7.4 Concerns that the potential impacts of the Project would outweigh proposed benefits are expressed by a few PILs, on the grounds that the proposed increase in flights would cause more harm than could be mitigated by the sustainable transport proposals, and that these proposals would therefore not represent improvements, so much as mitigation of further harm.

Assessments and information

- 2.7.5 A similar number of respondents query whether the proposals would be implemented, without expanding further. A few other PILs express concern that the PEIR's transport strategy attempts to 'predict and provide' necessary transport infrastructure rather than deciding on specific targets for sustainable transport provision and making decisions on capacity requirements based on this.
- 2.7.6 A few PILs express concern that the consultation documents contain potentially misleading or inaccurate information, on the grounds that:
- measures to encourage sustainable transport would be outweighed by improvements to the transport network and parking spaces;
 - it is unlikely that 50% of Gatwick passengers already use sustainable transport modes to access the airport;
 - the proposals would not contribute to the local economy, due to restrictions against local residents using the station for commuting;
 - the proposals appear to amount to 'greenwashing'; and
 - the PEIR's assessments of potential traffic impacts are based on outdated data, rely on off-site network improvements that cannot be guaranteed, and under-report potential negative impacts.

Public transport

- 2.7.7 A small number of PILs raise points related to accessing the airport by rail. A few of these PILs express concern on the grounds that the proposals would increase passenger congestion on trains that are already at capacity, in particular on the Brighton Main Line and London lines, and that this would be exacerbated by a lack of funds to improve train capacity through East Croydon

Station and the Balcombe Tunnel. A few PILs also state that Gatwick sits on a single railway line, making it difficult to access from more rural areas that are not well connected. A similar number comment on the charge for station pick-up and a lack of access for those using the station to commute, as well as high ticket prices deterring customers and staff from travelling to the airport by rail.

2.7.8 A few PILs express concern about the general impact that the proposals would have on public transport infrastructure more widely, on the grounds that the infrastructure could not handle an increase in passenger volumes.

2.7.9 A similar number of PILs express the following concerns regarding public transport proposals:

- access to the airport by public transport would be difficult for staff and customers, due to a lack of east-west rail links and to areas outside of London;
- access to the airport by bus or coach would be difficult, due to insufficient links to local rural areas, inadequate signage to bus stops, and a lack of proposed infrastructure upgrades necessary to meet increased demand; and
- the airport may not be promoting improved sustainable transport for staff to the same extent as it is for passengers.

Cars/taxis

2.7.10 Many PILs express concern about the proposals in relation to car and taxi use. A small number of these state that the proposals may increase congestion around the airport and cause speeding on local roads, saying that insufficient mitigation measures have been proposed for these possible impacts.

2.7.11 A few PILs comment that the proposals appear to encourage car use to the airport, citing an increase in car usage of 40% by 2047, compared to 2019 levels.

2.7.12 A similar number of PILs query proposals to increase car parking spaces, on the grounds that this could undermine proposals to encourage public transport use by encouraging travel to the airport by car, as well as having a negative impact on the environment through increased land take and carbon emissions. A similar number of PILs express concern that increased staff parking spaces would benefit senior members of staff, and that there are limited options for Gatwick staff to park at the rail station.

2.7.13 A few PILs express concern about the current road network, on the grounds that:

- local and central government is unlikely to fund improvements due to financial constraints;
- current speed limits make it unsafe to walk to the airport;
- traffic often uses narrow country roads with many bends and at a fast speed, leading to safety risks for local pedestrians and farm vehicles;
- local roads would be spoilt by the installation of junctions or additional lanes; and
- the road network, including the M23 and M25, could not cope with an increase in demand or a smart motorway design; and that construction vehicles would lead to blockages on the roads.

2.7.14 A few other PILs raise concerns about:

- proposals to encourage car-pooling, saying that shift times may not accommodate this and

- that proposed car-pooling to schools has rarely been successful;
- the forecourt fee, on the grounds that it encourages drop-off and pick-up points at more inconvenient locations to avoid the fee, applies even to those using the rail network, and has served to alienate customers; and
- encouraging car and taxi use, as this may increase anti-social behaviour such as defecating, littering and illegal or unauthorised parking, including on local roads.

Active travel

- 2.7.15 A small number of PILs express concern about proposals to increase active travel to the airport. A few PILs say that current cycle paths are insufficient, that the airport is inaccessible by bike, and that current cycle parking and storage spaces are not easily located. A similar number also raise doubts over the feasibility of staff and passengers with luggage cycling to the airport.
- 2.7.16 A similar number voice their concerns over footpaths, claiming that there is inadequate signage to find them, that the paths to Horley are dangerous, as they are overgrown and have poor lighting, and that footpaths around Charlwood have been severed.

Assessments

- 2.7.17 A few PILs express concerns about the assessments that have been undertaken as part of the consultation process. These include that:
- modelling has relied on the Croydon Area Remodelling Scheme and Lower Thames Crossing improvements, but these are not guaranteed and thus are unsuitable for inclusion in baselines;
 - proposals may not have modelled off-peak rail capacity, which is likely to increase in the future;
 - the plans may have omitted key strategic transport documents by the Department for Transport and local councils, such as the Draft Crawley Borough Local Plan;
 - the PEIR may not have considered development proposals in the area, including Gatwick Green and the Horley Business Park, and the impact that such development would have on traffic; and
 - there may not have been sensitivity analysis of potential behavioural changes in staff use of modes of transport in light of the pandemic.

Environment

- 2.7.18 A few PILs express concern about the potential negative impact that these proposals would have on the environment. Comments include that the expected increase in traffic would lead to air, noise, and light pollution, as well as increasing carbon emissions. A few of these PILs say that even electric buses would use diesel generators, and therefore continue to contribute to air pollution. Other PILs express concern that the proposals would require extensive land take.

Other concerns

- 2.7.19 Other concerns raised by PILs regarding the proposals include that:
- the proposed upgrades to the road and public transport networks to improve access for the projected increase in passengers would be ineffective;
 - local infrastructure could not handle an increase in passengers;

- the proposed targets for increased sustainable transport and decreased travel by car are unlikely to be achieved; and
- Gatwick already has sufficient options for accessing the airport, meaning that further proposed upgrades are not required.

Suggestions about the proposals

General

- 2.7.20 A few PILs suggest that assessments should not include the Lower Thames Crossing and Croydon Area Remodelling schemes, as these have yet to be guaranteed, which could impact modal share targets.
- 2.7.21 A few PILs make requests for further information, including on the Gatwick Mode Choice Model and future plans for the Gatwick Express and coach services. There is also a suggestion that Gatwick matches Heathrow's commitment to a zero increase in passengers accessing the airport by road.

Cars

- 2.7.22 A few PILs suggest that Gatwick should discourage car use, in particular that expansion should be made dependent on a reduction in road transport, and that this should be subject to strict enforcement.
- 2.7.23 A few PILs suggest reductions in parking fees, including for short-term stay, and pick-up and drop-off. A few other PILs make more specific suggestions to remove the forecourt fee, on the grounds that it creates safety risks as cars drive quickly to evade the fee. Some suggest that local residents and businesses be exempt, especially when accessing the rail station.
- 2.7.24 Other suggestions offered by a few PILs each include:
- improved street lighting on the road approaching Gatwick;
 - the introduction of car-pooling schemes for staff;
 - incentives to encourage the use of electric or hybrid taxis, such as lower parking or drop-off fees, and the introduction of taxi charging points; and
 - that drop-off and collection points should be moved away from the front of the terminal.

Public transport

- 2.7.25 A few PILs make general suggestions to encourage public transport, especially for surface transport journeys, as this would reduce physical road expansions, potential flood risks, the airport's carbon footprint, and local land take. Specific improvements suggested include: greater public transport access from east and west of the airport, and the introduction of tunnels, without further clarification.
- 2.7.26 Improvements to bus access from local areas is suggested by a similar number of PILs, including more bus stops and park and ride facilities to encourage both passenger and staff use. A few suggest encouraging coach modal share in particular, on the grounds that this would be more accessible, affordable, and flexible for passengers.
- 2.7.27 A few PILs suggest: increased rail access:, including
- facilities for passenger access to the station separate from the drop-off area;

- general improvements to bring the Gatwick Express up to the perceived standard of its Heathrow counterpart;
- more frequent trains for commuters into London;
- more connections between Gatwick and other airports; and
- dedicated trains between Gatwick and London to prevent congestion on commuter trains.

Active travel

- 2.7.28 A few PILs suggest bicycle purchase schemes for staff, to encourage greater sustainable transport.
- 2.7.29 A few PILs suggest improved cycling facilities, including:
- bike storage and parking;
 - improved routes to local towns and villages, including those to the east of the airport;
 - greener routes to improve cyclist health;
 - connections between cycle routes and bus pick-up areas;
 - improved cycle lane quality, such as lanes that are covered and separate from cars;
 - bicycle rental schemes, where passengers could rent bikes from car parks and have their luggage transferred for them; and
 - bicycles for construction staff moving around the airport.
- 2.7.30 A few PILs suggest upgrades to footpaths for staff and public access to the airport.
- 2.7.31 A few PILs say that active travel users should be given priority when they encounter motor vehicle routes, such as at traffic signals, and that active travel infrastructure should be improved prior to the completion of the Project. These PILs also suggest that active travel be given stronger support to become a modal choice for those within active travel catchment areas, with a target of 90% staff walking to the airport, and 40% cycling.

2.8 Road improvements

Support for the proposals

- 2.8.1 A few PILs voice their support for the proposals, often in general terms. In some cases, these PILs believe that the changes would be necessary to meet future demand or say that they particularly support the proposed South Terminal flyover.
- 2.8.2 In a few cases, PILs attach particular conditions or other comments to their support, saying that:
- the local community will be disrupted;
 - trees should not be cut down;
 - the proposals must deliver on their promise; or
 - safety measures would be required, such as speed limits and a hard shoulder.

Concerns about the proposals

- 2.8.3 A small number of PILs voice their opposition to the proposals in general terms, without providing further detail.

Traffic flow

- 2.8.4 A small number of PILs claim that the construction and operational phases of the Project could

lead to increased congestion on local roads and in residential areas such as Charlwood. PILs feel that traffic could be disrupted for years, and that the upgrades would not resolve congestion issues on the M23.

- 2.8.5 A few PILs are concerned about the safety of smart motorways, adding that M23 upgrades would restrict connectivity in the area.

Design

- 2.8.6 A small number of respondents express the following concerns about the overall design of the proposals:

- access to local roads, agricultural land, construction compounds and settlements such as Charlwood, could become hindered due to a lack of capacity on roads;
- there would be a lack of provision of pedestrian routes on Balcombe Road;
- the scheme appears to be of benefit only to Gatwick and not to local people;
- the effectiveness of the design and mitigation measures proposed might not be sufficient, given the potential future demand; and
- there would need to be funding available for the maintenance of the road alterations.

- 2.8.7 A few other respondents make comments about the design of the proposed roundabout upgrades, including that there may be no need for the South Terminal upgrade, and that Longbridge roundabout could be ineffective.

Environment

- 2.8.8 A small number of PILs express concern about the air, noise, and light pollution increases that the proposals might have, particularly with regards to Charlwood.

- 2.8.9 Other issues raised by PILs include that:

- carbon emissions would increase;
- the proposals might impact on Dovenby Hall;
- too many trees, plants, and habitats would be lost as a result of the proposals, particularly around the River Mole; and
- the land take could increase beyond initial proposals.

Lack of need

- 2.8.10 A small number of PILs claim that the proposals would not be needed as the existing road capacity is adequate.

Assessments and lack of detail

- 2.8.11 A small number of PILs also claim that the consultation documents lack detail and that up-to-date impact assessments have not been provided.

Suggestions about the proposals

Design and Construction

- 2.8.12 A small number of PILs state that the A22, A264, and local roads around Horley should be upgraded as part of the scheme. They also believe that the design could be improved with tunnels, embedded energy recovery technology, underpasses, and a direct link to Balcombe

Road. A few other PILs claim that green materials should be used for construction, and that working hours could be made to fit in with periods of off-peak road demand.

Traffic Flow

2.8.13 A few PILs suggest that road use by private vehicles should be discouraged, and that bus and cycle routes should be provided as part of the proposals.

Further information

2.8.14 A few PILs request further information about access to agricultural land holdings, and about traffic assessments.

2.9 Public and sustainable transport

Support for the proposals

2.9.1 A few PILs express support for the scheme in general terms, while a few others state that they support Gatwick's sustainable transport targets, and the prospect of improved access to transport modes such as rail.

2.9.2 A few PILs support the PEIR's transport proposals in principle, with specific mention of increasing rail journeys at weekends, early in the morning, and late in the evening.

Concerns about the proposals

Assessments

2.9.3 A few PILs raise doubts over the assessments mentioned in the PEIR, including that the PLANET model does not model at individual train level; future baseline predictions fail to recognise that the number of passengers standing on trains at peak times would be unlikely to change given a lack of funding for southern rail improvements; off-peak train capacity has not been modelled, meaning Gatwick's assumption of increased leisure travel does not recognise a lack of capacity to deal with this.

Effectiveness

2.9.4 Some PILs state that the targets set by Gatwick for increasing sustainable transport are unrealistic and overly ambitious. They claim that the proposals constitute 'greenwashing', since the expansion of the runway would increase the number of flights. A few other PILs believe that the target of 60% sustainable travel to the airport should be higher.

2.9.5 Some PILs express other concerns, including that:

- cars would remain the most convenient form of transport;
- carpooling would not be popular;
- the proposals could increase congestion; and
- car park expansion could encourage private vehicle use.

Active and public transport

2.9.6 A small number of PILs feel that active travel would not be feasible for elderly passengers and those who live far away. These PILs say that active travel users would be put at risk during periods of adverse weather, and in places where active travel routes meet busy roads.

- 2.9.7 According to a few other PILs, the accessibility of rail travel would be reduced for users living far away. These PILs say that existing trains may already be at full capacity. A similar number of PILs express concern that public transport may be generally more unreliable and more expensive to use than private vehicles.
- 2.9.8 A few PILs express concerns regarding the PEIR's discussion of increased rail capacity, on the grounds that Gatwick does not plan to help raise rail capacity, but instead relies on improvements to the Brighton Main Line and Croydon Area Remodelling Scheme, which may be unlikely to receive funding in the foreseeable future. Other concerns include that: proposals for earlier, later, and weekend services would undermine access to the rail tracks for routine maintenance; the Gatwick Express does not carry many passengers, and therefore may not be feasible; that Gatwick incorrectly assumes the business of the Brighton-London line shows its resilience to increased capacity, instead of the fact it could not handle more passengers; and that improvements to the highways without corresponding upgrades to the rail network would only serve to encourage more car use.

Suggestions about the proposals

Public Transport

- 2.9.9 A small number of PILs feel that bus services to and from Gatwick should run more frequently, with better connectivity to local residential areas and comfortable bus stops should. These respondents also feel that private car use should be discouraged whilst electric vehicle use should be incentivised through parking subsidies and provision of sufficient charging points.
- 2.9.10 A small number of PILs say that Gatwick should fund rail improvements, while a similar number say that Gatwick should provide electric vehicles to its staff.
- 2.9.11 A small number of PILs make suggestions for how to improve luggage transit for public transport users, for example use of courier services.
- 2.9.12 A few PILs believe that the availability of trains to and from Gatwick should be increased, and that stations such as East Croydon, Crawley and Horley should be upgraded. A similar number of PILs state that fares for public transport should be subsidised.
- 2.9.13 A few PILs make suggestions regarding the PEIR's chapter on traffic and transport. Recommendations regarding the rail network include improving rail infrastructure, such as a new railway between London and the South Coast, new underground station for improved connectivity, connecting the Gatwick Express to the wider train service, such as stopping at Clapham Junction, to improve its passenger loads, and additional infrastructure to prevent delays due to maintenance. These PILs also suggest that Gatwick help fund schemes such as the Croydon Area Remodelling Scheme and Brighton Mainline Upgrade Programme, and that without this funding, these projects are not guaranteed and should not be included in future baseline calculations. The same PILs also suggest working with experts who understand rail capacity issues and more general improvements to public transport, including extending bus infrastructure across local areas that lack railway access.

Active travel

- 2.9.14 According to a few PILs, cycle storage for staff and passengers should be provided. They

suggest that non-motorised routes should receive lighting improvements and ask that safe routes and crossing points could be included in the proposals.

Information and decision-making

2.9.15 A small number of PILs suggest that the scope of the consultation could be improved with further assessments, and PILs should be consulted further and included within the decision-making process.

2.10 Construction: managing impacts

Support for the proposals

2.10.1 A few PILs support the proposals for managing construction impacts, including proposals to avoid or minimise adverse effects on local communities and highway users. Additional comments include the welcoming of management measures to ensure that impacts to air quality receptors are minimised, with specifically reference to the development and implementation of a Dust Management Plan and Stakeholder Communications Plan. These respondents also welcome plans for community engagement before works commence on site.

Concerns about the proposals

Noise, air and light pollution

2.10.2 Some PILs express general concern about the potential negative impact of the Project on quality of life for local communities, with regard to the possibility of noise, air and light pollution during construction. Some PILs express particular concern about the length of the construction period; works occurring during the night; and the volume of construction traffic. A few PILs express concern that the Consultation Summary Document states that construction plans have not yet been developed. They request that the impact of both construction and changes to surface access be fully modelled and all mitigation measures made publicly available.

2.10.3 A few PILs express specific concern about construction traffic, including HGVs, using small lanes in the area, with specific reference to Povey Cross Road.

Disruption

2.10.4 A few PILs express concern about the potential disruption to existing operations for businesses located both within and near the airport. They request more communication and dialogue with local businesses and residents, including in Charlwood, about the proposed works.

2.10.5 A few PILs express concern about whether local infrastructure can support increased traffic levels due to both construction and operation of the Project. The same PILs specifically mention the impact of the Project on the M23, on smaller local roads, and on the capacity of the local train network to cope with increased levels of commuting. A few PILs suggest that the impacts of construction traffic and road closures on local roads have not been fully assessed. A few PILs note the need to assess the cumulative impacts of construction traffic alongside other proposed developments in the area such as Gatwick Green. A similar number of PILs further note the lack of detail in the Consultation Summary Document about where construction workers would live during construction and how they would access the temporary construction sites. One PIL suggests use of enclosed smoking areas for workers, to minimise impact on local residents.

- 2.10.6 A few PILs express concern about disruption to local amenities, specifically requesting clarification on how members of the Horley Piscatorial Society would access the north bank of the river as it flows south through Church Meadow. A few further concerns are expressed about the direct and indirect impacts on Dovenby Hall, noting that the PEIR does not identify whether land in this area would be used to accommodate permanent or temporary infrastructure.
- 2.10.7 A few PILs express concern about the potential negative impact of dust from construction on residential homes situated to the north of the airport. One PIL suggests locating works to the south where they claim that fewer residential properties would be affected.

Environment

- 2.10.8 A few PILs express concern about the environmental impact of construction, in general terms, while a similar number of PILs express specific concern about greenhouse gas emissions during construction, requesting provision of a full carbon impact assessment.

Suggestions about the proposals

Environment and sustainability

- 2.10.9 Many PILs suggest modelling, monitoring and mitigation of noise, air pollution, climate and local transport impacts. PILs state that there should be no short-term increase in air pollution, traffic congestion and noise. A few PILs further suggest that the carbon impact of construction be fully accounted for to ensure Gatwick remains in line with overall government carbon budgets.
- 2.10.10 A few PILs express concern about the Project's sustainability, suggesting that electric construction vehicles should be prioritised, that sustainability be included as a factor in the tendering process and that materials be sourced from the UK. A few PILs suggest management of grey water use through grey water filtration and recycling installations at key areas, noting that this may be particularly important for dust suppression. A few PILs suggest that the construction plant be electrically powered to reduce high frequency noise impacts as well as improving energy efficiency.

Mitigation

- 2.10.11 A small number of PILs suggest that Gatwick engage in regular dialogues with the local community, including provision of weekly updates on plans and developments. A few PILs suggest ways for Gatwick to work with the local community, including provision of training to enable local residents to gain employment during construction.
- 2.10.12 A few PILs suggest that the deployment of construction workers be managed from the Construction Consolidation Centre via a bespoke construction service bus network to reduce traffic on the highway. A similar number of PILs suggest that HGVs and heavy construction traffic not be allowed to use local and rural roads.
- 2.10.13 A few PILs suggest that a detailed assessment be carried out prior to construction to adequately evaluate operational disruption to the airport.
- 2.10.14 Specific suggestions from a few PILs include using a rail siding and link road direct to the construction site to eliminate the need for tipper and HGV vehicles on roads, and moving all construction to the south of the airport where PILs claim that there are fewer residential houses

and no planned housing developments.

2.11 Construction: transport

Support for the proposals

- 2.11.1 A few PILs express support in general terms, saying for example that the proposals are 'acceptable' or 'good', with some noting the importance of robust management.

Concerns about the proposals

Construction traffic

- 2.11.2 Many PILs express scepticism about the possibility of mitigating negative impacts from construction traffic, stating that an increase in traffic is inevitable with large-scale developments. Respondents express concern about construction traffic going through local villages, noting that this would cause disruption, increase noise and air pollution, negatively impact health and wellbeing and significantly increase safety risks for local residents. A few PILs request clarity on proposed enforcement mechanisms of mitigation measures, such as approved routes for construction traffic.
- 2.11.3 Some PILs express concern about increased volume of traffic affecting residents and businesses, noting that some local areas already experience severe congestion, particularly when there are incidents on the M23. Specific locations mentioned include Longbridge roundabout, Reigate and Charlwood. These PILs express further concern about the increased use of small, local roads unsuitable for high volumes of traffic.
- 2.11.4 A few PILs express scepticism about the proposal to encourage the construction workforce to use public transport, saying that the itinerant and shift-based workforce are likely to need to rely on their own transport. A few PILs express concern about use of the railway line for freight, noting that the line lacks sufficient capacity.

Lack of detail

- 2.11.5 A few PILs express concern about a lack of detail within the proposals, noting that while Gatwick states that the construction phase will follow the guidelines of the Code of Construction Practice, the details are not known until negotiated with local authorities. Further concerns include lack of clarity about whether there will be access to the construction compound north of Junction 9a from Balcombe Road, and whether the potential for further facilities, outside the current Gatwick footprint, but servicing the proposed expansion, have been considered in proposals.

Suggestions about the proposals

- A few PILs express concern about traffic disruption and safety, suggesting:
- that all construction traffic be restricted to using the main Strategic Road Network only, suggesting this be limited to the M23 and A23;
- provision of further information on travel arrangements for the construction workforce;
- working with all key stakeholders, including local businesses, to develop the Construction Traffic Management and ensure early publication to enable public consultation; Legal and General Pensions Limited specifically request inclusion in this consultation;
- close consultation with National Highways to manage any potential disruption to the Strategic Road Network, specifically to minimise potential delays to public transport and

coach services;

- expansion of the rail network to increase freight capacity;
- reservation of lanes for construction traffic on the spur road at specific times;
- high quality road construction to ensure longevity of any new roads;
- mandatory routing for construction traffic and good signage; and
- introduction of a speed limit on the road from the mini roundabout at Lowfield Heath, along the Charlwood Road to Bonnetts Lane to prevent HGVs travelling at high speed.

2.11.6 One PIL requests clarity on access arrangements for the construction compound north of Junction 9a on the M23 spur road, specifically as to whether this includes potential access off Balcombe Road that may affect accesses to Dovenby Hall and associated farmland.

2.12 Managing and mitigating effects: climate change and carbon

Support for the proposals

2.12.1 A few PILs express support for the proposed mitigation strategies and speak positively about plans to develop the Carbon and Climate Change Action Plan.

Concerns about the proposals

Environment

2.12.2 Many PILs, often replying via Gatwick Area Conservation Campaign, express concern about increased emissions associated with the proposals despite mitigation efforts. These respondents mention increases in flight numbers, passenger travel to the airport, and the role of leisure travel and frequent flyers in increasing emissions. These respondents also reference COP26 and the impact of construction on local carbon sinks. Some PILs state that the proposals would be detrimental to achieving national and international climate targets, including net zero by 2050. A few PILs also mention the potential health effects of increased pollution.

2.12.3 A small number of PILs, often replying via the Campaign Against Gatwick Noise Emissions, express scepticism about the proposals' reliance on projected advances in technology to reduce the impact of aviation on the climate. A similar number of PILs question the extent to which the impact of aviation can be mitigated, including through carbon offsetting. Similarly, a small number of PILs state that carbon offsetting is the wrong approach to take, claiming that it would be ineffective.

2.12.4 A few PILs voice opposition to the Project, saying that Gatwick would be unable to mitigate the impact of increased emissions. A few PILs express scepticism that any mitigation will be undertaken if the proposed development is approved. A similar number feel that the timelines for implementing mitigation are not ambitious enough.

2.12.5 A few PILs feel that the mitigation strategies to reduce emissions are unnecessary.

Lack of detail

2.12.6 A small number of PILs state that the consultation documents lack detail, including on:

- how Gatwick will work towards net zero;
- the viability of alternative fuels and their storage; and

- the models used, which they say exclude the effects of non-CO2 emissions and the radiative effects of contrails.

2.12.7 A few PILs also believe that the consultation documents are misleading and that the Project has been 'greenwashed'.

Suggestions about the proposals

2.12.8 A few PILs make suggestions for how to mitigate the environmental impact of aviation, including:

- implementing the proposed mitigation strategies without going ahead with the proposed development;
- focusing on reducing the number of flights;
- introducing a levy on the use of older, inefficient aeroplanes;
- using green construction methods;
- using green energy and products across the airport;
- encourage companies to use green aeroplanes;
- build infrastructure to support the use of alternative fuels;
- encourage passengers to use green transport to and from the airport;
- working with stakeholders; and
- implementing enforceable monitoring that includes penalties if mitigation targets are missed.

2.12.9 A few PILs, most of whom responded via the Gatwick Area Conservation Campaign, suggest that approval for the proposed development should be conditional on Gatwick demonstrating a commitment to a progressive reduction in emissions against a 2019 baseline.

2.13 Managing and mitigating effects: noise envelope

Support for the proposals

2.13.1 A few PILs voice support for the proposed noise envelope, saying that aircraft have become progressively quieter as technology has progressed. A similar number of PILs hope to work closely with Gatwick as the Project progresses.

Concerns about the proposals

2.13.2 A few PILs state their objection to the proposals and do so without elaboration.

Effectiveness and extent

2.13.3 Some PILs express concern about the effectiveness of the noise envelope. These respondents feel that the proposed noise envelope does not extend far enough and would be ineffective in reducing noise. These respondents, who often reply via the Gatwick Area Conservation Campaign, state that the proposed noise envelope does not align with WHO's Environmental Noise Guidelines; CAA guidance, including discussion with stakeholders; or government policy.

Numbers of flights and flight paths

2.13.4 A small number of PILs raise concerns about increased flight numbers associated with the Project increasing the level of noise. A similar number complain about the number of night-time flights at Gatwick, particularly during the summer months when people may want to open their windows to remain cool while sleeping.

- 2.13.5 A few PILs, who often respond via the Campaign Against Gatwick Noise Emissions, raise concerns about the effects of new or changing flight paths on noise levels, including whether noise would increase both in areas currently affected or unaffected by noise pollution. These PILs also state that planes often do not comply with the recommended flight paths, and pilots often choose to fly in a way that increases noise. A similar number of PILs argue that many currently affected by noise would not benefit from the proposals.

Commitment to noise reduction, monitoring and enforcement

- 2.13.6 A small number of PILs express scepticism about the proposals. These PILs argue that if Gatwick was serious about reducing noise, the noise envelope or similar mitigation methods would already be in place. These PILs also question the monitoring arrangements, which they argue should be conducted by an independent, external body. A few PILs question the lack of enforcement measures. A similar number of PILs also feel that the insulation scheme is ineffective, and that triple glazing does not reduce noise sufficiently.

Aircraft technology

- 2.13.7 A few PILs feel that the proposals demonstrate too much optimism about future improvements in technology. These PILs also state their concern about the current financial position of airline companies and ask whether there is motivation to invest in newer planes.

Assessment

- 2.13.8 A few PILs comment on the use of 2019 noise level as a baseline, with respondents indicating that they found the noise level too high in 2019. A few PILs express confusion about the baseline, and question whether the aim would be to maintain noise at the 2019 level, or to start with the 2019 level as a maximum and progressively reduce noise below this level.

Noise pollution

- 2.13.9 Some PILs, who often respond via the Campaign Against Gatwick Noise Emissions, express concern about noise pollution. Most of these PILs talk about their own experiences of noise pollution, and their concern that noise pollution is increasing. A few respondents also raise concerns about the increased traffic that would follow from an increase in passenger numbers.
- 2.13.10 A small number of PILs are concerned about the effects of noise on local residents and communities. These PILs feel that the risk of increased noise associated with the Project outweighs any economic benefits. A few PILs refer to the health effects of noise exposure, with a few talking about the effect that noise has on outdoor community recreation space. A few PILs also refer to the effect of noise on their own homes, including how it could affect the market value of their property. A few PILs feel that those affected should be able to claim compensation.

Misleading information

- 2.13.11 A small number of PILs, most of whom reply via the Campaign Against Gatwick Noise Emissions and the Gatwick Area Conservation Campaign, feel that the information provided about the noise envelope is misleading. They state that:
- the proposals mislead respondents about the potential changes to airspace and flight paths associated with their modernisation;

- the choice of metrics to inform the noise envelope are inadequate; and
- the consultation documents misrepresent the noise impact associated with the Project.

Lack of detail

2.13.12 A few PILs feel that the information provided about the noise envelope lacks detail, including about:

- how their property will be affected;
- the visualisation of the noise envelope;
- enforcement measures if targets are missed;
- how the effectiveness of the noise envelope would be reviewed;
- how changes to the noise envelope would be made if necessary;
- the health effects of noise;
- the noise targets
- the type and size of aircraft using the northern runway;
- how flight paths would be affected; and what the 2019 baseline for noise means.

Suggestions about the proposals

2.13.13 A small number of PILs, most of whom respond via Gatwick Area Conservation Campaign, make suggestions for the noise envelope, including:

- implementing the noise envelope now, rather than later on as part of the Project;
- reducing the number of flights;
- buying land from PILs affected by noise;
- consulting more closely with affected stakeholders, including Gatwick's Noise Management Board;
- setting up design groups that include community groups and local authority representatives;
- enforcing noise reduction measures and fining non-compliant airlines;
- widening the envelope;
- banning night-time and early morning flights;
- encouraging pilots to adopt flying styles that help to reduce noise; and
- using a wider range of measures to inform the noise envelope.

2.14 Managing and mitigating effects: noise mitigation

Support for the proposals

2.14.1 A small number of PILs express their support for Gatwick's commitments to mitigating noise pollution, including the provision of insulation grants and the continuation of the night flight curfew.

Concerns about the proposals

2.14.2 A few PILs voice their opposition to the proposals without providing further comment.

Local community and businesses

2.14.3 Many PILs voice their concern in general terms that noise pollution would increase as a result of the Project. A similar number of other PILs express concern about noise pollution on the northern

side of the airport, particularly during take-off and landing. These respondents also voice concern about the potential impact of noise on local communities, including on health, sleep patterns, and quality of life, and also the possible disruption that noise could cause to schools. Respondents also voice concern about the potential disruption to agriculture and tourism.

Mitigation

2.14.4 Some PILs state that the proposed insulation scheme would be ineffective, particularly for outdoor spaces, houses below flight paths, and properties that need open windows. A small number of others feel that mitigation of any noise impact would not be possible, given the frequency of flights to and from Gatwick. They also state that mitigation would lack effectiveness outside of the immediate vicinity of the airport. A few PILs believe that the compensation offered would be inadequate, particularly the insulation scheme.

2.14.5 A small number of PILs voice other concerns, including that:

- aircraft would not become quieter for a long time;
- mitigation of noise from airborne aircraft would be difficult;
- the noise envelope appears to be too small; and
- new flight paths could shift noise pollution to new areas.

Assessments

2.14.6 A small number of PILs voice the following concerns about the assessments provided, saying that:

- there appears to be a lack of information about the effectiveness of mitigation measures;
- it is misleading for Gatwick to claim that noise levels would reduce when flight numbers would increase;
- that noise modelling and the data it is based on could be misleading; and
- the noise assessments may be too narrow in geographic and temporal scope.

Suggestions about the proposals

2.14.7 Some PILs make suggestions including that:

- triple glazing should be offered, and multiple companies should be able to compete for contracts;
- modern aircraft should be used;
- planes should fly at higher altitudes;
- fewer flights should use Gatwick and that night flights should be restricted;
- Gatwick should compensate local residents for potential decreases in property value, and that the 2014 compensation suggestion by the Airport Commission should be honoured;
- noise barriers should be positioned to the east of the airport; and
- further assessments should be conducted, including Environmental Impact Assessments and flight path congestion reports.

Further information

2.14.8 A few PILs also make requests for further information on topics including the insulation and rehousing schemes, compensation, and the financial implications of the mitigation proposals.

2.15 Consultation process

Support for the proposals

General

2.15.1 A small number of PILs express support for the consultation process, saying that they are glad to have had the opportunity to contribute, that the consultation was well-run and important, and that Gatwick's approach thus far has met with their approval. A few respondents also express support for communication and promotion of the consultation. These respondents speak positively about Gatwick's intentions, saying that promotion was widely undertaken, that adequate time for feedback was provided, and that they felt that their concerns were being heard.

Information and materials

2.15.2 A few PILs express support for the accessibility of the consultation, including the consultation information and materials. These PILs say that they found the materials to be widely available, comprehensive, easy to understand, and well-presented across a range of media, including online, at the virtual exhibition and on USB sticks provided by Gatwick. A few PILs say that they found the virtual exhibition particularly helpful in helping them to make a considered judgement on the proposals.

Events

2.15.3 A few PILs refer to the conduct of Gatwick representatives at consultation events, saying that members of the team were courteous, and that the calls with noise experts were helpful.

Concerns about the proposals

Predetermination

2.15.4 A small number of PILs express concern that the outcome of the consultation has been predetermined and that the consultation is only a token gesture. These PILs say that Gatwick is only consulting because it is required by law, that the consultation assumes that the Project will be built, and that the questionnaire is biased in Gatwick's favour.

Communication and promotion

2.15.5 A similar number of PILs express concern about the promotion of the consultation, which they say has been inadequate. These PILs say that the consultation has not been well publicised in their local areas, that they found out about the consultation from friends, and that Gatwick has not publicised the consultation in all the areas that could be impacted by aircraft noise. A few of these PILs say that they believe the promotion of the consultation by Gatwick to have been deliberately poor.

2.15.6 A small number of PILs express concern about Gatwick's communication. These PILs express concern that despite being neighbours of Gatwick, no one has attempted to talk to them directly about the potential impact of the Project, including its construction, on their property. A few of these PILs also say that they are awaiting information requested from members of the Gatwick planning team.

Consultation process

- 2.15.7 A few PILs express other concerns about the consultation process, including that;
- the consultation relies too heavily on access technology, computers and the internet;
 - the scope of some of the associated development, including offices and hotels, falls outside of the remit of the DCO process;
 - the consultation was too long, or on the other hand, that there was inadequate time to respond;
 - the consultation was not fit for purpose; and
 - they do not trust Gatwick to provide reliable information.

Misleading or inaccurate information

- 2.15.8 Some PILs express concern that the consultation information and materials contain misleading and inaccurate information, with most doing so in general terms. These PILs describe the consultation as containing 'propaganda' for the Project, as well as biased information, to attempt to elicit support from readers. A few of these PILs express concern that environmental issues, such as aircraft emissions and the lack of alternative aviation fuels, are not discussed.
- 2.15.9 A few PILs comment on the assessments and forecasts, claiming that they contain outdated information. A few of these PILs say that Gatwick has exaggerated the need for the Project, using passenger assumptions based on pre-pandemic growth figures. A similar number of PILs refer to the information about airspace movements, believing that Gatwick misrepresents the availability of aircraft slots by saying it can facilitate more, when there are no corresponding slots at European airports, constraining the possibility of growth.
- 2.15.10 A few PILs refer to the consultation maps and diagrams, including those on the website. These PILs say that the maps are too small, do not clearly show the impacts on local areas, and exclude specific locations including Charlwood.

Complexity and volume of information

- 2.15.11 A few PILs are concerned about the complexity and volume of information provided for the consultation, saying that the consultation materials are too long, and contain data that is difficult to understand. A similar number of respondents express concern about the consultation questionnaire, saying that it is long-winded and repetitive. A few of these PILS say that the questionnaire was deliberately designed in a way that would deter respondents from completing it.

Lack of detail

- 2.15.12 A small number of PILs express concern about a perceived lack of detail in the consultation information and materials. Most of these PILs do so in general terms, describing the detail as being 'limited'. A few PILs express concern about the consultation newsletter, saying that it lacks detail on the potential negative environmental impacts of the proposal. Other PILs express concern that the consultation lacks detail on a range of issues including;
- the Project's possible impact on the mental health of local residents;
 - compensation for those forced to move house;
 - how local transport infrastructure would cope with increased capacity; and

- how effective the noise envelope would be.

Events

- 2.15.13 A small number of PILs express concern about the consultation events. A few of these PILs query the overall effectiveness of consultation events, saying that they were not engaging, and that limited documents and resources were available. A few of these PILs also express concern about the lack of branding on the Mobile Project Office.
- 2.15.14 A few PILs express concern about the location of events, saying that there were no events organised in villages likely to be affected by the consultation, including: Lingfield, Smallfield, Burstow and Charlwood.
- 2.15.15 A similar number of PILs say that staff at consultation events did not have adequate knowledge to answer questions. A few other PILs claim that staff did not pass on their concerns, or follow up with details of the route to submit complaints.

Suggestions about the proposals

Engagement

- 2.15.16 A small number of PILs ask to engage with Gatwick further to provide clarity about their responses or for Gatwick to address their concerns.
- 2.15.17 A few PILs suggest that Gatwick should listen to, or work with, stakeholders including local groups, residents and staff. A few of these PILs say that Gatwick should phone affected stakeholders to inform them of how the Project might affect their land.
- 2.15.18 A few other PILs suggest that Gatwick provide a summary of all comments received during the consultation; and continue to engage with local stakeholders on its proposals.

Events

- 2.15.19 A few PILs make suggestions about the location for consultation events, saying that the Mobile Project Office could have been placed in more prominent locations, including the car park behind Collingwood Batchellor in Tunbridge Wells.

Further information

- 2.15.20 A few PILs request information, including:
- what the Project would mean for their property specifically;
 - feedback on the points that they and others in the local community have raised; and
 - the impact of extra traffic loading to the village of Charlwood, including the subsequent impact on property values and residents' health.