



Gatwick Airport Northern Runway Project

Environmental Statement

Appendix 7.3.2: Summary of Stakeholder PEIR and Updated PEI Responses –
Historic Environment

Book 5

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1 Introduction

1.1 General

- 1.1.1 This document forms **ES Appendix 7.3.2: Summary of Stakeholder PEIR and Updated PEI Responses – Historic Environment** (Doc Ref. 5.3) of the Environmental Statement (ES) prepared on behalf of Gatwick Airport Limited (GAL) for the proposal to make best use of Gatwick Airport’s existing runways and infrastructure (referred to within this report as ‘the Project’).
- 1.1.2 This document provides the summary of stakeholder Preliminary Environmental Information Report (PEIR) and updated Preliminary Environmental Information (PEI) consultation responses for historic environment for the Project.

2 Summary of Stakeholder PEIR and Updated PEI Consultation Responses for Historic Environment

Consultee	Date	Details	How/where taken into account in ES
Responses to PEIR consultation			
Crawley Borough Council	01 December 2021	It is not accepted at this stage that there is no negative impact from the NRP on above ground heritage assets. At this point, there is a lack of clarity on the development works required as part of the project, the location, form, design of the physical works and the absence of a lighting strategy result in a premature conclusion on these impacts; these details and discrepancies must be addressed.	Further evidence on the nature and appearance of the physical works is presented within the ES. Construction lighting is addressed in ES Appendix 5.3.2: Code of Construction Practice (Doc Ref. 5.3), whilst operational lighting is addressed in ES Appendix 5.2.2: Operational Lighting Framework (Doc Ref. 5.3). The assessment of impacts on above ground heritage assets undertaken within Section 7.9 of ES Chapter 7: Historic Environment (Doc Ref. 5.1) is based on that updated information.
Crawley Borough Council	01 December 2021	Further work is necessary in relation to the identified heritage assets, to fully demonstrate the impact of the works on their setting as currently there is a lack of evidence provided; cumulative impacts must also be considered.	The assessment of impacts on above ground heritage assets as a result of changes within their setting is presented within Section 7.9 of ES Chapter 7: Historic Environment (Doc Ref. 5.1). The assessment of cumulative effects on heritage assets is presented within Section 7.11 of ES Chapter 7: Historic Environment (Doc Ref. 5.1).
Crawley Borough Council	01 December 2021	Mitigation and enhancement measures should not just be limited to on site assets but opportunities considered for those heritage assets which are located beyond the development boundary where their setting could be improved by physical works or landscaping within the NRP boundary. Further consideration should be given to the NRP design and layout to further reduce impacts on heritage assets.	The overall Project design and the environmental mitigation measures presented within ES Chapter 5: Project Description (Doc Ref. 5.1) have been developed with due consideration for opportunities to avoid or reduce impacts on heritage assets.
Crawley Borough Council	01 December 2021	Appropriate Noise assessment needs to be undertaken and, where required, bespoke mitigation undertaken.	The assessment of the impacts on noise on heritage assets is presented within Section 7.9 of ES Chapter 7: Historic Environment (Doc Ref. 5.1). The methodology for the assessment of effects resulting from increased air noise is described within ES Appendix 7.6.1: Historic Environment Baseline Report (Doc Ref. 5.3) and has been agreed with Historic England. No noise mitigation specific to the historic environment is proposed, but the assessment of effects on the historic environment takes account of any noise attenuation measures included as part of the Project.

Consultee	Date	Details	How/where taken into account in ES
Crawley Borough Council	01 December 2021	On the whole this is a decent submission, with the major caveats of not appraising the heritage / archaeological significance of either the airport or the land beneath it, and a local disagreement with the way the nationally-defined assessment methodology ends up grading the heritage assets. Would look forward to the continuation of archaeological evaluation work to better appraise and define the potential of the sites that have not been done yet – particularly within and around Museum Field, but also on Pentagon Field and Crawter’s Field, and in association with the River Mole diversion. GAL are recommended to carry out a Historic Area Appraisal of the Airport itself to address the gaps in the study, and that the borehole and geotechnical information will be a comprehensive survey, to confirm the archaeological truncation that has occurred. Absence of this data is a pretty major omission and we’d really like to see this as soon as possible, preferably prior to the grant of a DCO for the project.	The assessment methodology is described in Section 7.4 of ES Chapter 7: Historic Environment (Doc Ref. 5.1). The grading of heritage assets is based on guidance and best practice. A phased programme of archaeological investigation comprising geophysical survey and trial trenching has been undertaken in order to further inform the understanding of archaeological potential at selected locations within the Project site. This included investigations in and around Museum Field and in Pentagon Field. No investigation has been undertaken at Crawter’s Field as no works are now proposed here for the Project. No investigation has been undertaken in the area of the proposed River Mole diversion as the works proposed here for the Project are very limited and the area has been previously subject to archaeological investigation as part of the work undertaken for the Gatwick North West Zone. Available borehole and geotechnical information, and other relevant information, has been reviewed as part of an examination of potential archaeological truncation within the airport; the results are presented within ES Appendix 7.6.1: Historic Environment Baseline Report (Doc Ref. 5.3) and ES Appendix 7.6.4: Geotechnical Data Review (Doc Ref. 5.3). A request was made through the appropriate Topic Working Group (TWG) for clarity on what is meant by ‘a Historic Area Appraisal of the Airport’, but no responses were received.
Historic England	01 December 2021	Under the scheme proposal, there is the potential for harm, probably amounting to less than substantial harm, to a number of undesignated archaeological heritage assets in areas to the east of the existing airport; less than substantial harm to the significance of one grade II* listed building (the Charwood Park Farmhouse) and a small number of grade II listed buildings on the periphery of the airport estate and; and harm to the significance of a scheduled monument (Thunderfield Castle mediaeval moated site) by development in its close settings.	The assessment of impacts on above ground heritage assets as a result of changes within their setting is presented within Section 7.9 of ES Chapter 7: Historic Environment (Doc Ref. 5.1). In NPPF terms, harm to any designated heritage asset as a result of changes within its setting would be less than substantial.
Historic England	01 December 2021	In addition, there is the potential for far-reaching impacts to the setting of heritage assets as a result of changes in the noise profile and disturbance from expanded airport operations.	The assessment of the impact of air noise on heritage assets has been undertaken in accordance with the appropriate guidance as advised in the Airports National Policy Statement and is presented within Section 7.9 of ES Chapter 7: Historic Environment (Doc Ref. 5.1).
Historic England	01 December 2021	There is also the possibility of direct or indirect impacts to currently unidentified built heritage assets.	The assessment of impacts on built heritage assets is presented within Section 7.9 of ES Chapter 7: Historic Environment (Doc Ref. 5.1). The only built heritage asset other than those statutorily listed or locally listed that has been identified by the Project team or any consultee is the former airfield control tower.
Historic England	01 December 2021	Based on the work to date to characterise the archaeological potential of the land affected HE consider it likely that the harm to undesignated archaeological assets could to a large extent be mitigated by the public benefits of an enhanced understanding that could be derived from the opportunity to undertake a detailed archaeological study of this part of the Wealden landscape.	Impacts on buried archaeological remains are limited to a few small areas of land therefore it would not be proportionate to undertake a detailed archaeological study of this part of the Weald.

Consultee	Date	Details	How/where taken into account in ES
			Strategies for further archaeological investigations and historic building recording are set out in ES Appendix 8.6.1: Written Scheme of Investigation for Post-consent Archaeological Investigations – Surrey (Doc Ref. 5.3) and ES Appendix 8.6.2: Written Scheme of Investigation for Post-consent Archaeological Investigations and Historic Building Recording – West Sussex (Doc Ref. 5.3).
Historic England	01 December 2021	One scheduled monument (the Thunderfield Castle) to the north-east of the airport may be directly affected by the proposals to improve access roads connecting to the strategic road network, and HE would welcome the opportunity to discuss how best to understand what the impacts might be and what works might be appropriate to mitigate for any residual harm once more detailed design has been possible.	Changes to the local road network would not result in any harm to the significance of Thunderfield Castle. This issue has been discussed with Historic England and it is agreed that no mitigation is required.
Historic England	01 December 2021	It would appear that no listed buildings would be lost (ie through demolition) but that the Grade II* former Charlwood Park Farmhouse and a number of grade II listed buildings would be subject to direct or indirect impacts that may compromise their significance. In the context of the NPPF policies, any harm will require clear and convincing justification. Furthermore, where harm is unavoidable Historic England would wish to be involved, along with local authority partners and owners, in developing a mitigation strategy to both minimise and offset as far as practicable, the loss of significance to designated heritage assets.	The assessment of impacts on above ground heritage assets as a result of changes within their setting is presented within Section 7.9 of ES Chapter 7: Historic Environment (Doc Ref. 5.1). The Project team welcomes Historic England's offer of assistance in developing appropriate mitigation strategies.
Historic England	01 December 2021	We note that the issue of air noise and its effect on tranquility that may form part of the way in which the setting of designated assets are experienced requires further assessment and discussion, and we would be pleased to continue the discussions we have had to date on the appropriate methodology for measuring this.	The assessment of the impact of air noise on heritage assets has been undertaken in accordance with the appropriate guidance as advised in the Airports National Policy Statement and is presented within Section 7.9 of ES Chapter 7: Historic Environment (Doc Ref. 5.1).
Historic England	01 December 2021	We note your conclusions to date that the revised noise regime that arises from the changes in aircraft movements and intensity of flights, which is based on assumed aircraft movements as they take off and land and on assumptions about the height at which aircraft noise affects tranquility will have negligible or minimal effects on some heritage assets (and may benefit others). We suggest, however, that this interim conclusion may require further testing.	The assessment of the impact of air noise on heritage assets has been undertaken in accordance with the appropriate guidance as advised in the Airports National Policy Statement and is presented within Section 7.9 of ES Chapter 7: Historic Environment (Doc Ref. 5.1).
Horsham District Council	01 December 2021	Noise is likely to be the largest impact on the historic environment and HDC seek clarity from GAL regarding any intentions to bring the WIZAD route into more routine use and reserve the right to make further comments on this issue as appropriate.	Information regarding the use of the WIZAD route is presented within ES Chapter 5: Project Design (Doc Ref. 5.1). The use of this route has been allowed for in the air noise modelling used for the assessment presented within Section 7.9 of ES Chapter 7: Historic Environment (Doc Ref. 5.1).
Mole Valley District Council	01 December 2021	The increase in the frequency of flights resulting from the proposal is considered by Mole Valley to be material ie 21% (assuming passenger numbers relate to flights). The noise envelope is narrowly drawn because it is based on relatively high noise thresholds, but Mole Valley's Historic Environment Officer (HEO) considers that, in practice, both noise and visual movement of aircraft has a much wider impact on the landscape surrounding the airport, and corresponding impact on the setting of the historic environment within this landscape.	The assessment of the impact of air noise on heritage assets has been undertaken in accordance with the appropriate guidance as advised in the Airports National Policy Statement. The methodology for the assessment of effects resulting from increased air noise is described within ES Appendix 7.6.1: Historic Environment Baseline Report (Doc Ref. 5.3). The applicant is not aware of any studies which demonstrate that visual impacts arising from movement of aircraft in the sky can cause

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			harm to the significance of heritage assets, or any methodologies that seek to assess the level of any such harm.
Mole Valley District Council	01 December 2021	The Planning Inspectorate in their scoping report did not agree with only scoping a 3km study area for impacts to heritage assets. The Inspectorate thought it seemed to conflict with the proposed 5km study area in the landscaping assessment. There are many heritage assets in Mole Valley that are located between the 3 and 5km boundaries. No recognition of the wider geographical impacts of the increase in flight numbers appears to have been made in the consultation. Mole Valley's HEO considers that aircraft and aircraft noise are alien features within the historic environment and, given this sensitivity, any increase in noise or visual impacts should be properly recognised.	<p>There is no requirement for the study area for the assessment of landscape and visual effects to be the same as the study area for the assessment of effects on heritage assets as these are separate topics using different assessment methodologies.</p> <p>The assessment of air noise on heritage assets has been undertaken in accordance with the appropriate guidance as advised in the Airports National Policy Statement. The study area for this assessment is not based on any specific distance from the Project site boundary (eg 3 km or 5 km) but is actually based on the predicted noise change footprint, as prescribed in the methodology presented within the appropriate guidance and described within ES Appendix 7.6.1: Historic Environment Baseline Report (Doc Ref. 5.3).</p> <p>The assessment presented within Section 7.9 of ES Chapter 7: Historic Environment (Doc Ref. 5.1) identifies very little impact on the significance of heritage assets within 3 km of the Project site boundary - extending the study area to 5 km is very unlikely to result in the identification of additional impacts.</p>
Mole Valley District Council	01 December 2021	It is welcomed that a Noise Insulation Scheme is proposed to properties that are most affected by noise; however, in terms of the historic environment and specifically heritage assets, it must be assessed and recognised that it will not always be possible, due to their historic nature, to carry out many of the alterations which are proposed to be offered under this scheme. Examples being: acoustic ventilators, replacement doors and acoustically upgraded bedroom ceilings. In these cases, it is felt that the increase in noise from additional aircraft could not be considered to have 'no significant impact' on the historic environment. It is considered important that the impact from the proposals on these other heritage assets, many of which are under the flight path of the Emergency runway, is recognised and assessed in the ES.	<p>The assessment of the impact of air noise on heritage assets has been undertaken in accordance with the appropriate guidance as advised in the Airports National Policy Statement and is presented within Section 7.9 of ES Chapter 7: Historic Environment (Doc Ref. 5.1).</p> <p>Where the assessment identifies any impacts on heritage assets, this has been done without any consideration of potential mitigation measures that require alterations to the asset.</p> <p>In respect of any listed buildings that fall within the zone where the Noise Insulation Scheme is available to owners/occupiers, it is acknowledged that Listed Building Consent may be required for certain types of noise attenuation, including the installation of acoustic glazing. There are specialist designs of secondary glazing that are designed to minimise impact on listed buildings and have been found acceptable. Similarly acoustic ventilators can be designed and located to minimise impact.</p>
Mole Valley District Council	01 December 2021	It has not been demonstrated that Option 1 for the replacement CARE facility will not have an impact on the historic environment. Option 2 is proposed to be approximately 200m from Grade II* Charlwood Park Farmhouse (not within the District, but only accessible from MVDC). The 50m flue of the CARE facility is likely to be visible from Charlwood Park Farmhouse and in views from heritage asserts within MVDC, including Listed Buildings and possibly Charlwood Conservation Area. In the absence of elevations or more details and varied views and	CARE Option 1 has been selected as the most appropriate option to take forward into the application. This was the preferred option identified by those consultees that stated a preference. This facility will have a narrow flue up to 48 metres high. Information is presented within the ES which demonstrates that the flue would not be visible in

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		viewpoints, it has not been adequately demonstrated that this facility would not have a significant impact upon the historic environment.	views from or across the Grade II* listed Charlwood Park Farmhouse, or in views from any listed building or other location within the Conservation Area at Charlwood. This is discussed in paragraphs 7.9.67 – 7.9.68 of ES Chapter 7: Historic Environment (Doc Ref. 5.1) and evidenced in ES Figures 8.9.89 and 8.9.17 (Doc Ref 5.2).
Mole Valley District Council	01 December 2021	Several of MVDC's heritage assets have been assessed for aircraft noise. The example given within the PEIR is Church of St John the Baptist at Capel. It is said this Listed Building would see a reduction in air noise due in part to aircraft fleet mix changes and would see a drop even with a 'do nothing scenario'. However, there is an assumption made for the impact on the Grade II listed Quaker Meeting House at Capel, as being the same as that at the St John Baptist church, which is 300m away. As the Quaker Meeting House is closer to Gatwick and the end of the runway, it is unclear why only an assumption is made. A full assessment of air noise on this and other Listed Buildings in Mole Valley, none of which are mentioned in the assessment, should be carried out.	At a distance of around 7.5 km from the end of the main and northern runways it is reasonable to assume that the noise change will be the same for both of these places of worship. The noise levels predicted at St John the Baptist Church and the Quaker Meeting House in Capel are within 1 decibel, ie not noticeably different, so can be assessed together. The assessment of the impact of air noise on heritage assets has been undertaken in accordance with the appropriate guidance as advised in the Airports National Policy Statement and is presented within Section 7.9 of ES Chapter 7: Historic Environment (Doc Ref. 5.1).
Reigate and Banstead Borough Council	30 November 2021	The Desk Based Assessment Historic Environment Baseline Report is set out in Appendix 7.6.1: Historic Environment Baseline Report. It would benefit from a widening of the research including the use of parish maps, such as the 1602 Map of Horley and the Horley enclosure maps which are noticeably absent from the report, relying instead on the wider Ordnance Survey base maps.	All of the historic maps referenced by Reigate and Banstead Borough Council have been examined and relevant information is presented within ES Appendix 7.6.1: Historic Environment Baseline Report (Doc Ref. 5.3).
Reigate and Banstead Borough Council	30 November 2021	The maps also consider a Zone of Theoretical Visibility (ZTV) for changes to the settings of heritage assets and the ZTV has been established for the Landscape, Townscape and Visual Assessment. The inclusion of a separate plan showing all heritage assets within the areas of the maps or within 3 km would be useful for context.	ES Figure 7.6.2 (Doc Ref. 5.2) shows the location of all designated heritage assets within 3 km of the Project site boundary, whilst ES Figure 7.6.3 (Doc Ref. 5.2) shows the location of the designated heritage assets within 3 km of the Project site boundary and also within the ZTV.
Reigate and Banstead Borough Council	30 November 2021	Changes to the Longbridge roundabout will result in a loss of mature planting which acts as a visual and acoustic barrier to the roads in this location. Whilst this may overall appear to have a minor visual impact, we would want to see further details as to how this could impact on the Church Road Conservation Area.	The assessment of impacts on above ground heritage assets, including the Church Road (Horley) Conservation Area, as a result of changes within their setting is presented within Section 7.9 of ES Chapter 7: Historic Environment (Doc Ref. 5.1).
Reigate and Banstead Borough Council	30 November 2021	The second pond option adjacent to Longbridge Roundabout is further north in Church Meadows. This is in an Area of High Archaeological Potential. The site is currently open and there are likely to be impacts on local ecology. Should both proposed locations be found inappropriate it is unclear what further options could be brought forward and how they would be scrutinized as part of the DCO process prior to submission to the Planning Inspectorate.	This second attenuation lagoon within Church Meadows is no longer proposed as part of the Project.
Reigate and Banstead Borough Council	30 November 2021	At present our principal concerns relate to the final location of the flood alleviation pond, the footpath route changes and whether they are fit for purpose. In terms of a flood alleviation pond in Church Meadows it would need to be carefully designed, relevant archaeological surveys undertaken, and details of the biodiversity enhancement measures proposed.	This attenuation lagoon within Church Meadows is no longer proposed as part of the Project.
Sevenoaks District Council	01 November 2021	SDC are concerned for the impact on our historic landscapes from an increase of over-flight and increased road traffic. The noise from additional aircrafts may be intrusive resulting in a negative impact on the enjoyment of	The assessment of the impact of air noise on heritage assets has been undertaken in accordance with the appropriate guidance as advised in the Airports National Policy Statement and is presented

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		Sevenoaks District's historic landscapes. These are integral to the historic character of the district and to Kent in addition to being tourism attractions.	within Section 7.9 of ES Chapter 7: Historic Environment (Doc Ref. 5.1).
Surrey County Council	01 December 2021	<p>The following comments on this topic can be summarised in four key points:</p> <ol style="list-style-type: none"> 1. We strongly recommend further appraisal of the heritage/archaeological significance of the airport itself and areas of the operational airport (and car parks) assumed to have low archaeological potential and appraisal of the potential of sites not yet examined – particularly Longbridge roundabout and Reigate Field. 2. Ground investigation surveys should be completed at the earliest opportunity. 3. Further technical work in relation to viewpoints, visualisations, landscape character and green infrastructure is required to inform the Landscape and Visual Impact Assessment (LVIA). 4. Detailed design is required in order to fully consider surface water flood risk and sustainable drainage impact. 	<p>Available borehole and geotechnical information, and other relevant information, has been reviewed as part of an examination of potential archaeological truncation within the airport; the results are presented within ES Appendix 7.6.1: Historic Environment Baseline Report (Doc Ref. 5.3) and Appendix 7.6.4: Geotechnical Data Review (Doc Ref. 5.3).</p> <p>Additional archaeological investigations have been undertaken at Longbridge Roundabout and Reigate Field. The results of that work are summarised within ES Appendix 7.6.1: Historic Environment Baseline Report (Doc Ref. 5.3), and the detailed report is presented as ES Appendix 7.6.3: Archaeological Evaluation Report: Land Associated with the Gatwick Airport Northern Runway Scheme (Phase 2: Longbridge Roundabout and Reigate Field) (Doc Ref. 5.3).</p>
Surrey County Council	01 December 2021	However, areas within the operational airport and other areas such as car parks have been identified as having 'low archaeological potential' due to previous development impacts. In most cases this assumption needs to be further explored, and low potential should not automatically equal no potential.	Available borehole and geotechnical information, and other relevant information, has been reviewed as part of an examination of potential archaeological truncation within the airport; the results are presented within ES Appendix 7.6.1: Historic Environment Baseline Report (Doc Ref. 5.3) and ES Appendix 7.6.4: Geotechnical Data Review (Doc Ref. 5.3).
Surrey County Council	01 December 2021	Use of the Airports NPS (table 7.2.1) whilst obviously acceptable as the national methodology, leads to what we consider to be an inappropriately downgraded assessment system for heritage assets. Locally significant sites are rated as low, meaning that we disagree with some of the "significance" assessments in the baseline study and therefore feel that there is a potential lack of appreciation of potentially significant local and regionally important archaeology.	The assessment methodology is described in Section 7.4 of ES Chapter 7: Historic Environment (Doc Ref. 5.1). The grading of heritage assets is based on guidance and best practice. The attribution of levels of 'significance' within ES Appendix 7.6.1: Historic Environment Baseline Report (Doc Ref. 5.3) are based on the experience and judgement of the authors of that document. Some level of disagreement is anticipated given the absence of substantive guidance on this issue; however it is considered that any adjustments to the levels of 'significance' would not result in changes to the assessed impacts and effects presented within Section 7.9 of ES Chapter 7: Historic Environment (Doc Ref. 5.1).
Surrey County Council	01 December 2021	Within the PEIR, operational impacts on archaeology have been 'scoped out'. However, we would like to highlight a couple of potential operational impacts which should be considered. This includes areas highlighted as having the potential for palaeochannels, where if waterlogged, could experience potential impacts post-construction and therefore, will require ongoing monitoring. The impacts of environmental mitigation such as tree planting will also likely have archaeological effects during the operation stage, and these also will need to be addressed.	No monitoring is proposed with regard to palaeochannels. Depending on the nature of the works proposed for the Project at any specific location it may be necessary to remove all waterlogged material from a palaeochannel (in order to prevent future subsidence). Future monitoring of such locations would not be helpful as there would be no way of adjusting any changes that may occur over time. ES Appendix 7.8.2: A Written Scheme of Investigation for Post-consent Archaeological Investigations and Historic

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			<p>Building Recording - West Sussex (Doc Ref. 5.3) includes arrangements for the investigation of palaeochannels.</p> <p>Land proposed for environmental mitigation has been subject to archaeological investigation as appropriate. Strategies for further archaeological investigations and historic building recording are set out in ES Appendix 8.6.1: Written Scheme of Investigation for Post-consent Archaeological Investigations – Surrey (Doc Ref. 5.3) and ES Appendix 8.6.2: Written Scheme of Investigation for Post-consent Archaeological Investigations and Historic Building Recording – West Sussex (Doc Ref. 5.3).</p>
Surrey County Council	01 December 2021	On next steps, we look forward to the continuation of archaeological evaluation work to better appraise and define the potential of sites not yet examined – particularly Longbridge roundabout and Reigate Field. We trust that borehole and geotechnical information promised will take the form of a comprehensive survey.	<p>Additional archaeological investigations have been undertaken at Longbridge Roundabout and Reigate Field. The results of that work are summarised within ES Appendix 7.6.1: Historic Environment Baseline Report (Doc Ref. 5.3), and the detailed report is presented as ES Appendix 7.6.3: Archaeological Evaluation Report: Land Associated with the Gatwick Airport Northern Runway Scheme (Phase 2: Longbridge Roundabout and Reigate Field) (Doc Ref. 5.3).</p> <p>Available borehole and geotechnical information, and other relevant information, has been reviewed as part of an examination of potential archaeological truncation within the airport; the results are presented within ES Appendix 7.6.1: Historic Environment Baseline Report (Doc Ref. 5.3) and ES Appendix 7.6.4: Geotechnical Data Review (Doc Ref. 5.3).</p>
Surrey County Council	01 December 2021	Where potential impacts are identified, further evaluation work is proposed to support the EIA which is appropriate. While the proposed mitigation measures may well be appropriate, the key risk is in the discovery of nationally important remains where preservation in situ would be the preferred option. Where mitigation is required, there will need to be the assurance that the necessary timescales and resources are available in order to fully complete this work.	Strategies for further archaeological investigations and historic building recording are set out in ES Appendix 8.6.1: Written Scheme of Investigation for Post-consent Archaeological Investigations – Surrey (Doc Ref. 5.3) and ES Appendix 8.6.2: Written Scheme of Investigation for Post-consent Archaeological Investigations and Historic Building Recording – West Sussex (Doc Ref. 5.3).
Surrey County Council	01 December 2021	[PEIR inaccuracies or deficiencies] Table 7.2.1 sets out that “no situations have been identified in which a visualisation has been considered necessary”. However table 7.7.1 identifies sites listed as being harmed visually. Despite PINs request in the scoping report, no visualisations have been provided.	The assessment of impacts and effects presented within Section 7.9 of ES Chapter 7: Historic Environment (Doc Ref. 5.1) includes references to visualisations when this is appropriate and helpful.
Surrey County Council	01 December 2021	[PEIR inaccuracies or deficiencies] The PEIR provides what appears to be a good catalogue of what is likely to be in the ZTV, but without visualisations, it is difficult to assess. Again we note suggestions from PINs that these be included.	The assessment of impacts and effects presented within Section 7.9 of ES Chapter 7: Historic Environment (Doc Ref. 5.1) includes references to visualisations when this is appropriate and helpful.
Surrey County Council	01 December 2021	[PEIR inaccuracies or deficiencies] Paragraph 7.9.111 indicates that no future monitoring is proposed with regard to the historic environment. Please note our comment on palaeochannels and potential waterlogged sites. Future monitoring may be necessary	No monitoring is proposed with regard to palaeochannels. Depending on the nature of the works proposed for the Project at any specific location it may be necessary to remove all waterlogged material from a palaeochannel (in order to prevent future

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			subsidence). Future monitoring of such locations would not be helpful as there would be no way of adjusting any changes that may occur over time. ES Appendix 7.8.2: A Written Scheme of Investigation for Post-consent Archaeological Investigations and Historic Building Recording - West Sussex (Doc Ref. 5.3) includes arrangements for the investigation of palaeochannels.
Surrey County Council	01 December 2021	[PEIR inaccuracies or deficiencies] Table 7.15.1 mistakenly names a CSAI as a “County Site of Archaeological Interest”, rather than “Importance”.	Text now amended.
Surrey County Council	01 December 2021	[PEIR inaccuracies or deficiencies] Paragraph 6.3.117 – “Crawley AHAP”. It is actually a Surrey one (site 498).	Text now amended.
West Sussex County Council	01 November 2021	The impact on surviving archaeology within the site of the current airport has not been included within the impact assessment. Further assessment is required within the airport boundary itself.	Available borehole and geotechnical information, and other relevant information, has been reviewed as part of an examination of potential archaeological truncation within the airport; the results are presented within ES Appendix 7.6.1: Historic Environment Baseline Report (Doc Ref. 5.3) and ES Appendix 7.6.4: Geotechnical Data Review (Doc Ref. 5.3). The assessment of impacts on buried archaeological remains, including those potentially present within the operational airport, is presented within Section 7.9 of ES Chapter 7: Historic Environment (Doc Ref. 5.1).
West Sussex County Council	01 November 2021	WSSCC disagree with some of the ‘significance’ assessments in the Baseline Study, and most of the sites are more important to regional/local commentators, than the assessment process has concluded.	The attribution of levels of ‘significance’ within ES Appendix 7.6.1: Historic Environment Baseline Report (Doc Ref. 5.3) are based on the experience and judgement of the authors of that document. Some level of disagreement is anticipated given the absence of substantive guidance on this issue, however it is considered that any adjustments to the levels of ‘significance’ would not result in changes to the assessed impacts and effects presented within Section 7.9 of ES Chapter 7: Historic Environment (Doc Ref. 5.1).
West Sussex County Council	01 November 2021	WSSCC expects to see an Historic Area Appraisal of the airport itself to address the gaps in the baseline study. It is hoped the borehole and geotechnical information that GAL intend to review will be a comprehensive survey; if not, further ground truthing will be required to confirm the archaeological truncation that has been stated has occurred. Absence of this data is a major omission and further consultation on these matters will be required with relevant stakeholders prior to DCO application.	Available borehole and geotechnical information, and other relevant information, has been reviewed as part of an examination of potential archaeological truncation within the airport; the results are presented within ES Appendix 7.6.1: Historic Environment Baseline Report (Doc Ref. 5.3) and ES Appendix 7.6.4: Geotechnical Data Review (Doc Ref. 5.3). A request was made through the appropriate TWG for clarity on what is meant by ‘an Historic Area Appraisal of the airport itself’, but no responses were received.
Responses to updated PEI consultation			

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Historic England	25 July 2022	We feel that the introduction of a flyover at South Terminal Roundabout may result in more visual and aural intrusion into the setting of nearby heritage assets than would be the case with the earlier scheme. It is likely to remain less than substantial harm as defined in the NPPF, given the distance of separation and intervening built development in some cases, but a thorough assessment of the effects of these new elements of the proposals will be required to ascertain the level of harm.	The assessment of impacts on above ground heritage assets as a result of changes within their setting is presented within Section 7.9 of ES Chapter 7: Historic Environment (Doc Ref. 5.1).
Historic England	25 July 2022	At Longbridge Roundabout there is the potential for harm to the setting of the Church Road Horley Conservation Area from the proposed widening of the A23 bridge over the River Mole, but this is unlikely to be significant. Other aspects of the updated scheme (ie the M23 Spur, Airport Way, and North Terminal Roundabout, A23 London Road) are unlikely to result in more harm (or a significant reduction thereto) than the previous scheme proposals, and we maintain our position in this respect as set out in our earlier letter.	The assessment of impacts on above ground heritage assets as a result of changes within their setting is presented within Section 7.9 of ES Chapter 7: Historic Environment (Doc Ref. 5.1).
Reigate and Banstead Borough Council	26 July 2022	In archaeological terms the area may be significant in terms of river settlements in the Horley area have indicating considerable activity from the Iron Age and Roman period onwards, iron working from river alluvial deposits and in this case there will now be buried streams associated with supplying the moat with water as well as the moat itself and associated archaeology.	Archaeological investigation of the land west of the River Mole has found no evidence for the presence of archaeological sites or features, including palaeochannels.
Reigate and Banstead Borough Council	26 July 2022	The archaeological investigations could throw up further issues. In terms of the new bridge over the River Mole, we have no objection to the principle, but good and effective design will be critical.	Archaeological investigation of the land west of the River Mole has found no evidence for the presence of archaeological sites or features, including palaeochannels.
Reigate and Banstead Borough Council	26 July 2022	Table 3.1.1 Historic Environment – you may want to revisit the statement given our response above on the impact on the historic environment to Figure 3.6 Church Meadows.	This refers to the Council’s comments in the two rows above regarding the archaeological potential of the land at Church Meadows. Archaeological investigation of the land west of the River Mole has found no evidence for the presence of archaeological sites or features, including palaeochannels. Note that the Project no longer includes a proposal for an attenuation lagoon east of the River Mole in this area.
Surrey County Council	27 July 2022	The landscape and ecology section provides integrated concept mitigation designs for Car Park B, Church Meadows and Museum Field. The first of these is an Area of High Archaeological Potential and the second is adjacent to two AHAPs. We advise again of the need to consider archaeology when designing ecological mitigation.	Archaeology has been considered at all times within the design of the environmental mitigation areas. A programme of archaeological investigation has been undertaken on the west side of the River Mole at Longbridge Roundabout and the results of this work have been utilised within the design of this environmental mitigation area. Strategies for further archaeological investigations and historic building recording are set out in ES Appendix 8.6.1: Written Scheme of Investigation for Post-consent Archaeological Investigations – Surrey (Doc Ref. 5.3) and ES Appendix 8.6.2: Written Scheme of Investigation for Post-consent Archaeological Investigations and Historic Building Recording – West Sussex (Doc Ref. 5.3). It is noted here that land within Car Park B was formerly a surface car park and was subsequently significantly altered during the construction of the M23 Spur and the A23 Airport Way before being

Consultee	Date	Details	How/where taken into account in ES
			reinstated as a surface car park. An electricity substation has also been constructed here.
West Sussex County Council	27 July 2022	A23 Brighton Road – the proposed additional land take here may have the potential for impacts on as-yet unidentified heritage assets of archaeological interest.	Strategies for further archaeological investigations and historic building recording are set out in ES Appendix 8.6.1: Written Scheme of Investigation for Post-consent Archaeological Investigations – Surrey (Doc Ref. 5.3) and ES Appendix 8.6.2: Written Scheme of Investigation for Post-consent Archaeological Investigations and Historic Building Recording – West Sussex (Doc Ref. 5.3).
West Sussex County Council	27 July 2022	The additional areas of land take proposed are, for the most part, located within the existing carriageway or verges, or within areas that have been previously developed. However, there are also some areas of proposed additional land take that would be located within undeveloped land. The archaeological potential of these areas has not been assessed and there is, therefore, some potential for harm to as-yet unidentified heritage assets of archaeological interest. Given the limited size of these areas, even in the event that they do contain additional archaeological features, the likelihood that this might increase the significance of effects already identified at PEIR stage is considered low. It is anticipated that any additional archaeological features located within these areas of proposed new land take could be dealt with via standard archaeological mitigation methodologies, according to industry best practice. The proximity of the additional areas of land take to existing carriageway or development should not be taken to automatically imply that these areas have low or no archaeological potential. Assessment of archaeological potential should be assessed on a case-by-case basis.	Strategies for further archaeological investigations and historic building recording are set out in ES Appendix 8.6.1: Written Scheme of Investigation for Post-consent Archaeological Investigations – Surrey (Doc Ref. 5.3) and ES Appendix 8.6.2: Written Scheme of Investigation for Post-consent Archaeological Investigations and Historic Building Recording – West Sussex (Doc Ref. 5.3).
West Sussex County Council	27 July 2022	The impact of the proposed noise barriers on designated heritage assets (which might arise through changes in their setting) has not been assessed. With regards to changes to the settings of heritage assets within the study area, the consultation has not clearly demonstrated or evidenced that (a) no additional heritage assets would be subject to harm and (b) no additional harm to any receptors (ie, that the significance of effect is demonstrably no greater than that assessed at PEIR stage). The consultation document (Appendix 4) states ‘ <i>There would be no new or materially different significant effects as a result of this change compared to those reported in the PEIR</i> ’. However, this statement has not been evidenced and the potential for additional significant effects and/or increased severity of already identified effects (as compared to PEIR) remains a possibility as far as WSCC is concerned.	The assessment of impacts on above ground heritage assets as a result of changes within their setting is presented within Section 7.9 of ES Chapter 7: Historic Environment (Doc Ref. 5.1). This includes impacts arising from the proposed noise barriers required for highways improvements.

3 Glossary

3.1 Glossary of terms

Table 3.1.1: Glossary of Terms

Term	Description
EIA	Environmental Impact Assessment
ES	Environmental Statement
GAL	Gatwick Airport Limited
PEI	Preliminary Environmental Information
PEIR	Preliminary Environmental Information Report
TWG	Topic Working Group
ZTV	Zone of Theoretical Visibility