Gatwick Airport Northern Runway Project

Planning Statement

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Introduction

Gatwick has the busiest daytime single runway in the world. It serves more destinations than any other airport in the UK and is a critical component of our national infrastructure. In 2019, the airport had seen a decade of growth to more than 46 million passengers (with 283,000 air transport movements (ATMs)), and the airport was supporting over 135,000 jobs nationally, and making a contribution of £8.3bn to the UK economy every year.

The impact of the pandemic paused the growth in aviation but recovery has been rapid and strong pent-up demand is apparent. Gatwick needs more capacity to maintain efficient operations, improve resilience and meet passenger demand. To do this, it is proposed that the existing Northern Runway will be modified so that it can be brought into routine use: a sustainable approach which maximises the use of existing infrastructure. The proposals create additional aviation capacity without the scale of impact that may be expected from a new runway. The proposals are directly in line with Government policy by meeting the need for more capacity through making best use of existing airport infrastructure.

The purpose of this Planning Statement is to consider the planning case for granting a Development Consent Order (DCO) for the Northern Runway Project. It assesses the the impacts and benefits of the Project against the relevant legislative and planning policy context and reaches a conclusion on the planning balance that the Project accords with the relevant policy tests and should be granted consent.

The Northern Runway Project

GAL is proposing to add further longer-term capacity at Gatwick. The application proposes to make best use of Gatwick Airport's existing runways and infrastructure. The proposal is called the 'Northern Runway Project' (the Project). The Project will enable dual runway operations from the existing main and northern runways – the latter being proposed for routine use whereas it is currently only used infrequently as it is currently restricted to use as a standby/emergency runway. The Project is anticipated to open in 2029 to meet demand for additional capacity that cannot be provided on the main runway. It will contribute towards meeting national demand for aviation growth, enhance the operation and resilience of the airport - and cater for more Gatwick-specific demand.

The Project proposes alterations to the northern runway and investment in a range of infrastructure and facilities, largely within the confines of the existing airport boundary, but also including major road enhancements to improve access to Gatwick and the operation of the local transport network.

The proposals include:

- alterations to the existing northern runway, including repositioning its centreline 12 metres further north to enable dual runway operations;
- reconfiguration of taxiways;
- pier and stand amendments (including a proposed new pier);
- reconfiguration of existing airfield facilities;
- extensions to the North and South Terminals;

- provision of additional hotels and commercial space;
- provision of reconfigured car parking, including new surface and multi-storey car parks;
- surface access (highway) improvements;
- reconfiguration of existing utilities, including surface water, foul drainage and power; and
- landscape/ecological planting and environmental mitigation.

It is anticipated that, by 2047, the proposals would enable Gatwick to serve 80.2 million passengers within a cap of 386,000 ATMs per annum.

The Need for Additional Airport Capacity

Government policy has consistently recognised the importance of aviation. Recent publications confirm that the Government remains committed to support and enhance the aviation sector as a key component of the UK economy in view of the critical contribution it makes.

Government policy includes a commitment to growth to respond to forecast increases in demand and to strengthen the aviation sector and the contribution it makes to a number of Government policy objectives. The need for increased capacity in the sector is well established and releasing additional capacity is long overdue.

It is widely recognised that airports in London and the South East of England are increasingly facing capacity issues. The Department for Transport forecasts show that demand will outstrip capacity in the London airports system before 2030. The assessments observe that Heathrow and Gatwick are already ‘full’. By 2030, an additional 20 million+ passengers are forecast in the London market - far in excess of today’s available capacity, indicating significant need for capacity development. Even if a third runway is opened at Heathrow in the mid-2030s, forecasts emphasise the need additionally to make best use of all airport capacity in the South East.

At Gatwick, demand demonstrably exceeds supply. Gatwick is by far the most ‘oversubscribed’ airport for applications by airlines for take-off and landing slots. Despite peak capacity constraints, Gatwick saw significant levels of growth in the recent years, prior to the Covid-19 pandemic. Over the last decade, Gatwick has grown by over 14 million passengers reaching 46.6 million in the most recent full year of operations (2019) prior to the Covid-19 pandemic. Growth at Gatwick has consistently outstripped Department for Transport forecasts. In 2013, the Department for Transport forecast that Gatwick would accommodate 34 million passengers by 2017 whereas over 40 million passengers were actually handled in that year. The Department for Transport’s updated 2017 forecast continued to underestimate passenger demand at Gatwick, suggesting 45 million passengers would be reached by 2030 – a figure which was exceeded in 2017/18.

Benefits of the Northern Runway Project

The Project will help to boost the national, regional and local economy, maintain competition within the London market, open up new connections and support a Global Britain. The Project will contribute to meeting a strong demand for more airport capacity, whilst bringing operational and resilience benefits to the existing airport. The proposals will also open up new employment opportunities, create additional jobs, invest in training and bring significant benefits to the local region.

The airport will grow sustainably, addressing environmental and community impacts whilst Gatwick's continuing investments in sustainable travel and infrastructure mean that the airport's growth can be achieved consistently with the Government's climate change targets.

The NRP is an innovative means of achieving additional runway capacity for Gatwick, for the South East and for the UK without the scale of land take and associated impacts normally associated with providing a new additional runway. It can also be provided relatively quickly, with the NRP forecast to be operational in time to meet forecast demand well ahead of any third runway at Heathrow or the more limited capacity gain proposed for the later 2030s at Luton.

The Planning Framework

The Project is classed as a Nationally Significant Infrastructure Project ("NSIP") because it comprises both "airport-related development" and "highway-related development" under Section 14 of the Planning Act 2008 (the Act) because it proposes:

- alterations to an existing airport in England, the effect of which would increase by at least 10 million per year the number of passengers for whom the airport is capable of providing air passenger transport services; and
- alterations to highways in England, where National Highways is the strategic highways company for the highway, and where the speed limit is 50 mph or greater and the works each exceed the 12.5 hectare limit that applies to that category of road.

As a result, the Applicant requires development consent under the Act to construct and operate the Project.

The Planning Act 2008 is the primary legislation which establishes the legal framework for applying for, examining and determining applications for development consent for NSIPs. Its provisions require particular attention to be paid to the terms of any relevant National Policy Statements (NPS). The Government's Airports National Policy Statement (the ANPS) and National Networks National Policy Statement (NNNPS) provide the primary planning policy frameworks for the consideration and determination of the aviation and highways elements of the application respectively, but other Government and local planning policy documents can also be important and relevant.

Mitigation

All necessary controls and mitigation measures relied upon in the Environmental Impact Assessment (EIA) to avoid, reduce and if possible offset significant impacts of the Project have been identified. The mitigation will be translated into clear and enforceable controls; either via requirements in the DCO, Section 106 obligations or other consent regimes.

The draft Development Consent Order secures the extent of the consent and what development can be carried out and grants the powers which are necessary to deliver the Project. It describes the processes which must be followed and conditions for activities being carried out or powers being used. Schedule 2 of the draft Development Consent Order sets out the requirements that are necessary to control the construction, operation and maintenance of the Project. The requirements closely reflect the mitigation set

out in the Environmental Statement (ES) and ensure that the mitigation relied upon for the conclusions of the EIA is secured. The requirements include a restriction whereby from the date of dual runway operations, the airport may not be used for more than 386,000 ATMs per annum.

It is also intended that there would be legal agreements between the relevant parties to secure the mitigation where appropriate. Engagement with the relevant local authorities is ongoing. Broadly, the legal agreements would:

- form an extension to the existing Section 106 Agreement signed in May 2022 (and which expires on 31st December 2024) to operate from 1st January 2025 until such time that the development of the Project pursuant to the DCO is commenced; and then
- a new Section 106 Agreement in respect of the Project that would replace any existing Section 106 Agreement between the parties at the point the Project is commenced.

Additionally, some mitigation will be secured through other existing regulatory regimes which need to be complied with.

Conclusions

The application accords strongly with national planning policies by contributing to meeting the identified need for increased aviation capacity in the national interest through an innovative and carefully prepared design which generates significant local and wider benefits, whilst mitigating its relatively limited effects and embracing policies for sustainable development.

1 Introduction

1.1 Background

1.1.1 This Planning Statement relates to a Development Consent Order (DCO) application that is being submitted by Gatwick Airport Limited (GAL) to the Secretary of State (SoS) for Transport under the Planning Act 2008. The application proposes to make best use of Gatwick Airport's existing runways and infrastructure. The proposal is known as the **'Northern Runway Project'** (referred to in this Statement as 'the Project').

1.1.2 The Project will enable dual runway operations from the existing main and northern runways – the latter being proposed for routine use whereas it is currently only used infrequently. It is assumed to open in 2029 to meet demand for additional capacity that cannot be provided on the main runway.

1.1.3 The Project proposes alterations to the northern runway plus investment in a range of infrastructure and facilities, largely within the confines of the existing airport boundary, but also including major road enhancements to improve access to Gatwick.

1.1.4 The purpose of this Planning Statement is to consider the planning case for granting a DCO for the Project. It assesses the impacts and benefits of the Project against the legislative and planning policy context and reaches a conclusion on the planning balance that the Project accords with the relevant policy tests and should be granted consent.

1.1.5 This Planning Statement should be read alongside information that is contained within the other application documents and plans. A list of these documents is provided in the **Navigation Document** (Doc Ref. 1.3).

1.2 The Applicant

1.2.1 Gatwick Airport Limited (GAL) is the company licensed to operate Gatwick Airport by the Civil Aviation Authority (CAA). GAL is applying for development consent for the Northern Runway Project.

1.2.2 Since April 2014, Gatwick has been regulated under an Economic Regulation Licence issued by CAA where its service levels and charges are agreed with its airline customers in a set of commitments which are then endorsed by the CAA. The commitments are a set of legally enforceable undertakings made by GAL to its airlines covering price, service, investment, financial resilience, operational resilience and dispute resolution. They determine what GAL can charge its customers for providing core services and also establish quality standards for those services, including security queue times, availability of escalators and lifts, and passenger satisfaction scores. Every month, GAL publishes a report on how it is performing against this set of standards.

1.2.3 In May 2019, a new long-term partnership was formed between VINCI Airports and Global Infrastructure Partners (GIP) with VINCI Airports purchasing a 50.01% stake in the airport. This partnership sees Gatwick integrated into the network of VINCI Airports, one of the leading private airport operators in the world, which manages the development and operation of 65 airports

across the globe. Served by around 250 airlines, VINCI Airports' network handled 210 million passengers in 2022. VINCI Airports develops, finances, builds and operates airports, drawing on its investment capability, international network and know-how to optimise performance of existing airport infrastructure, facility expansions and new-build construction projects.

1.2.4 Global Infrastructure Partners (GIP), which manages the remaining 49.99% interest in Gatwick, is an independent infrastructure investor that makes equity investments in high quality infrastructure assets in the energy, transport and water/waste sectors.

1.3 The Northern Runway Project

1.3.1 Gatwick Airport is a major international airport located to the north of the town of Crawley in the county of West Sussex. Horley is located to the north. Junction 9 of the M23 and East Grinsted are located to the east. Horsham is located to the south-west.

1.3.2 The Project proposes alterations to the northern runway plus the development of a range of infrastructure and facilities, largely within the confines of the existing airport boundary.

1.3.3 GAL has carried out work on the operational concept development, aerodrome design and safety case for the Project in close discussion with the Civil Aviation Authority (CAA). GAL is confident that there are no obvious safety-related impediments why the project should not progress and expects this to be confirmed by the CAA directly and through a Letter of No Impediment.

1.3.4 The Project seeks permission to bring the existing northern runway, which is currently restricted to use as a standby/emergency runway, into routine operation alongside continued use of the main runway.

1.3.5 The Project also includes the development of a range of infrastructure and facilities, largely within the confines of the existing airport boundary, but also including major road enhancements to improve access to Gatwick. The proposals include:

- alterations to the existing northern runway, including repositioning its centreline 12 metres further north to enable dual runway operations;
- reconfiguration of taxiways;
- pier and stand amendments (including a proposed new pier);
- reconfiguration of other existing airfield facilities;
- extensions to the North and South Terminals;
- provision of additional hotels and commercial space;
- provision of reconfigured car parking, including new surface and multi-storey car parks;
- surface access (highway) improvements;
- reconfiguration of existing utilities, including surface water, foul drainage and power; and
- landscape/ecological planting and environmental mitigation.

1.3.6 It is anticipated that by 2047, the proposals would enable Gatwick to serve 80.2 million passengers with 386,000 Air Traffic Movements (ATMs) per annum.

1.3.7 The changes being proposed would mean the following for runway operations at the airport (see Figure 1.1):

- all arriving aircraft using the existing main runway during normal operations;
- departures shared between the existing main runway and the northern runway (with mainly smaller aircraft using the northern runway); and
- controlled dependency between the two runways to enable safe operations, including crossing of the northern runway by arriving aircraft.

1.3.8 The northern runway could be used for both arrivals and departures in circumstances when the main runway is closed, for example during periods of maintenance, in line with current practice.

Figure 1.1: How the two runways will operate together

1.3.9 To accommodate the proposed increase in passenger numbers, the following surface access improvements also form part of the Project:

- **M23 Spur**: Additional eastbound lane on the M23 Spur, which may require extra construction access from the north. The M23 Spur would be re-classified as an A-road that would become known as the 'Gatwick Spur'.
- **South Terminal Roundabout**: This is the sole entry point into the South Terminal forecourt, long stay car parks and commercial premises, with most airport traffic passing through it. A new flyover is proposed to take through traffic to and from M23 Junction 9. The existing bridge over the B2036 would be replaced to accommodate the proposed M23 spur and slip roads at this location.
- **North Terminal Roundabout**: This is the entry point to the North Terminal and local access roads, including airport perimeter roads. A westbound flyover connection is proposed between Airport Way and the A23 London Road. The proposed roundabout would be slightly larger than the existing one, with changes to entry and exit routes. It would also include a connection – via a signalised junction – to the A23 London Road. This improvement will provide a direct route from North Terminal south towards Crawley.

- **Longbridge Roundabout**: Longbridge roundabout is where the A23 London Road meets Povey Cross Road, the A217 and A23 Brighton Road. Changes are proposed to the carriageway and the pedestrian/cyclist crossings to improve safety.
- **Airport Way:** The proposal includes a third westbound lane on Airport Way. This would improve the capacity and safety of the design, and allow a better connection with a new flyover at North Terminal roundabout. This would result in the need to widen the existing bridge over the Brighton main Line railway and the embankment on the south side of Airport Way. The proposal also improves the eastbound link where traffic leaves the A23 London Road onto Airport Way, to replace the current layout.
- **A23 London Road**: The proposal is for a new signalised junction to be introduced with a new connector road to the North Terminal roundabout being provided to replace the existing slip road provision. The alignment on the approach to the new signalised junction would be modified to tie into the junction. The proposals also increase A23 westbound capacity by adding a third lane, from where the new flyover meets the A23 to Longbridge roundabout, which would include widening of the existing bridge over the River Mole.
- **A23 Brighton Road**: The proposal is to improve turning bay provision and widen the A23 Brighton Road bridge.
- **Active Travel**: The proposals include a range of improvements to existing active travel infrastructure provision as well as new connections such as the proposed path for pedestrians and cyclists between Longbridge Roundabout and North Terminal roundabout.

1.3.10 The designs and details of these improvements have been the subject of road traffic assessment and detailed engagement with highway authorities, including National Highways. As part of its ongoing business as usual operations (and independent from the Project), GAL has also worked with National Highways on a scheme to signalise both the North and South Terminal roundabouts to improve traffic flow and capacity in the period before the start of any dual runway operation.

1.3.11 A full description of the Project proposals is provided in Section 4 of this Planning Statement and in the Environmental Statement (ES) – **ES Chapter 5: Project Description** (Doc Ref. 5.1).

1.4 Current Planning Status and Control

1.4.1 Gatwick Airport lies within the administrative areas of Crawley Borough Council (CBC) and West Sussex County Council (WSCC). It is operational 24-hours a day, 365 days a year.

1.4.2 The Project is largely within the confines of the existing airport boundary which falls within CBC and WSCC's administrative areas. Elements of the Project's Order Limits fall outside the airport boundary and within Reigate and Banstead Borough Council, Tandridge District Council, Mole Valley District Council and Surrey County Council administrative areas. Collectively, these six authorities comprise the Category B and Category C authorities for the purposes of Section 43 of the Planning Act 2008 ("the Act".)

1.4.3 The statutory Development Plan for the Project comprises:

- Crawley Local Plan 2030 (adopted in December 2015);
- Reigate and Banstead Local Plan: Core Strategy (adopted in 2014, reviewed in June 2019);
- Reigate and Banstead Local Plan: Development Management Plan (September 2019);
- Saved Policies in the Mole Valley Local Plan (2000);
- Mole Valley Core Strategy (2009);
- Tandridge District Core Strategy (2008);

- Tandridge Local Plan Part 2: Detailed Policies 2014-2019 (July 2014);
- West Sussex Waste Local Plan (adopted April 2014);
- West Sussex Joint Minerals Local Plan (adopted in July 2018 with revisions adopted in March 2021);
- Surrey Local Transport Plan (December 2022); and
- Surrey Waste Local Plan 2019-2033 (adopted in 2020).

1.4.4 The Crawley Local Plan 2030 recognises the Airport's role and its importance as a key economic driver in the local and regional economy. Within the airport boundary, the principle of development which promotes the safe and efficient operation of the airport is supported.

1.4.5 The policies of CBC seek to ensure sufficient and satisfactory safeguards are in place to mitigate the impact of the operation of the airport on the environment, including considerations relating to noise, air quality, flooding, surface access, visual impact and climate change.

1.4.6 CBC has also adopted a supplementary planning document (SPD) entitled Development at Gatwick Airport (November 2008). The SPD provides guidance on the implementation of the Council's planning policies for the airport set out in the Local Plan.

1.4.7 In January 2021, CBC consulted on a review of its Local Plan, published as the draft Crawley Local Plan 2035 (Regulation 19 version). Delays to the Local Plan review have been experienced due to the Council needing to demonstrate that developments within the Sussex North water supply area do not add to impacts on protected nature conservation sites and must ensure that they are 'water neutral'. The Gatwick Airport site falls outside of the Sussex North water supply area. A new Regulation 19 public consultation was published in May 2023 for consultation.

1.4.8 The northern runway was granted planning permission in 1979 (application reference CR/125/79). Condition 3 of the planning permission provided that it could not be used simultaneously with the main runway. The simultaneous use of both runways was also ruled out by a Section 52 Agreement with WSCC. However, the agreement expired in 2019.

1.4.9 Whilst not linked to a specific planning permission, the operation of Gatwick is also subject to a Section 106 Legal Agreement which the airport originally entered into with WSCC and CBC in 2001. The agreement reflects a shared desire to see the airport grow, with measures in place to minimise as far as possible the effects of that growth. The agreement has been refreshed and extended on a regular basis with the latest extension agreed until 31st December 2024.

1.4.10 The agreement defines how Gatwick's operation, growth and environmental impacts will be managed responsibly and ensures that the Airport's wider sustainability strategy is aligned with Gatwick's local authority partners. The agreement underpins the important relationship between the airport owners and the local authorities who have responsibility for planning, environmental management and highways. The intention is that the Section 106 agreement will be extended beyond 31st December 2024; and in the event that a DCO is granted and implemented for the Project, a new legal agreement would then take effect.

1.4.11 Performance against the current Section 106 Agreement is reported in GAL's Annual Monitoring Report published on the airport's website. It is also communicated to the Gatwick Airport Consultative Committee (GATCOM) – an independent committee in which the management of Gatwick interacts with the local community, the local authorities, passenger representatives, businesses, Local Economic Partnerships and other airport users.

1.5 Legislative Framework

1.5.1 The Project is classed as a Nationally Significant Infrastructure Project ("NSIP") and falls under Sections 14(1)(i) and (h), 22(1)(b), (3) and (4)(b) and 23(1)(b), (4) and (5)(a) of the Act because it proposes:

- alterations to an existing airport in England, the effect of which would increase by at least 10 million per year the number of passengers for whom the airport is capable of providing air passenger transport services; and
- alterations to highways in England, where National Highways is the strategic highways company for the highway, and where the speed limit is 50 mph or greater and the works each exceed the 12.5 hectare limit that applies to that category of road.

1.5.2 As a result, both the airfield element of the Project and the highway works element of the Project are classed as NSIPs and fall within the definition of a project requiring development consent under the Act.

1.5.3 Consent is also sought for *'other associated development'* as defined in Schedule 1 (Authorised Development) of the **draft DCO** (Doc Ref. 3.1) which is connected with the construction and/or operation of the works defined in that schedule. Section 115(1) of the Act provides that development consent may be granted for *'(a) development for which development consent is required, or (b) associated development'*.

1.5.4 All of the works described in Schedule 1 (Authorised Development) of the draft DCO either constitute part of the relevant NSIPs or are *'associated development'* within the meaning of Section 115(2) of the Act, and so can properly be authorised by a DCO.

The Planning Act 2008

1.5.5 The Act is the primary legislation that establishes the legal framework for applying for, examining and determining applications for development consent for NSIPs.

1.5.6 Section 104 of the Act applies to decisions in cases where a National Policy Statement ("NPS") has effect in relation to the development of the description to which the application relates. This is the case with the highway works element of the Project.

1.5.7 Section 104(2) states that in deciding an application, the SoS must have regard to:

- any relevant NPSs;
- the appropriate marine policy documents (if any);
- any Local Impact Report ('LIR') submitted to the SoS;
- any matters prescribed in relation to development of the description to which the application relates; and
- any other matters which the SoS thinks are both important and relevant to their decision.

1.5.8 Section 104(3) states that the SoS must decide an application in accordance with any relevant NPS other than where certain exceptions set out in subsections (4) to (8) apply, namely, where doing so would be a breach of the United Kingdom's international obligations, or lead to the SoS breaching their duties imposed by or under any enactment, or otherwise be unlawful by virtue of any enactment, or (under subsection (7)), where the SoS considers the adverse impact of a

proposed development would outweigh its benefits, or where any condition prescribed for deciding an application otherwise than in accordance with the NPS is met.

1.5.9 Section 105 of the Act applies to decisions in relation to applications to which Section 104 does not apply (i.e. where there is no NPS which has effect). This is the case with the airfield element of the Project. There is an Airports NPS but, as explained below, it does not "have effect" for the purposes of Section 104 in this case.

The Airports National Policy Statement (ANPS)

1.5.10 On 26 June 2018, the Government designated the Airports NPS ("ANPS"). Paragraph 1.40 of the ANPS states that it only has effect in relation to the delivery of additional airport capacity through the provision of a Northwest Runway at Heathrow Airport, as well as in relation to proposals for new terminal capacity located between the new Northwest Runway and the existing Northern Runway and the reconfiguration of terminal facilities in the area between the existing runways at Heathrow Airport. Paragraph 1.41 of the ANPS makes clear that it does not have effect in relation to an application for development consent for an airport development not relating to Heathrow Airport.

1.5.11 Accordingly, the airfield element of the Project is to be determined under Section 105 of the Act.

1.5.12 Section 105 (2) of the Act states that, in determining an application for development consent, the SoS must have regard to:

- any local impact report (within the meaning given by Section 60(3)) submitted to the Commission before the deadline specified in a notice under Section 60(2);
- any matters prescribed in relation to development of the description to which the application relates; and
- any other matters which the SoS thinks are both important and relevant to the SoS's decision.

1.5.13 In this context, the ANPS is particularly important and relevant. Paragraph 1.41 of the ANPS states that the ANPS will be an important and relevant consideration in the determination of applications for new runway capacity or other airport infrastructure in London and the South East of England.

1.5.14 The ANPS, therefore, provides important policy which will be relevant to this DCO application.

1.5.15 The Applicant has been mindful of the fact, however, that the highway works element of the Project is subject to an NPS which does have effect.

The National Networks National Policy Statement (NNNPS)

1.5.16 In December 2014, the Government designated the NPS for National Networks ("NNNPS") which sets out the need for development of road, rail and strategic rail freight interchange projects on the national networks and the policy against which decisions on major road and rail projects will

be made.[1]

1.5.17 As noted above, highway improvement works are proposed as part of the Project in order to facilitate the increased passenger throughput (specifically improvements to the North Terminal and South Terminal roundabouts). As also noted above, these highway improvements meet the threshold for a highways NSIP in their own right. Consequently, the NNNPS has effect for this element of the Project, which will accordingly fall to be determined in accordance with Section 104 of the Act.

1.5.18 Notwithstanding that the different components of the Project are to be considered under different sections of the Act. The Project is not severable and the primary purpose of the highway works is to facilitate the sustainable expansion of airport operations.

1.5.19 When applying section 105 to the airport-related development, the ANPS includes policy (including policy on surface access) which applies to the overall development proposed, such that it is appropriate to consider the policy framework of the ANPS to assess the Project as a whole. This approach reflects the indivisible nature of the Project (and is consistent with the consideration of environmental information which properly addresses the Project as a single proposal). Therefore, whilst formal determination of the highways element of the proposals must take place against the requirements of Section 104, it is nevertheless appropriate to use the policy framework of the ANPS as the primary framework against which the Project as a whole should be tested.

Other policy

1.5.20 Paragraph 1.18 of the NNNPS states that the National Planning Policy Framework (NPPF) is also likely to be an important and relevant consideration in decisions on NSIPs but only to the extent relevant to that project. The NPPF itself explains that:

> *"5. The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision-making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework)."*

1.5.21 The Department for Transport (DfT) Circular 02/2013 'The Strategic Road Network and the Delivery of Sustainable Development' (September 2013)[2] remains a 'live' document and is material to projects that impact on strategic road networks.

1.5.22 Unlike for an application made for planning permission under the Town and Country Planning Acts, the local Development Plan is not the starting point for the consideration of a DCO

[1] The Department for Transport published a revised draft NNNPS for consultation on 14 March 2023. The draft NNNPS confirms in paragraph 1.16 that the existing NNNPS remains the relevant government policy and has full force and effect in relation to any applicable applications for development consent accepted for examination before designation of the updated NNNPS. The draft NNNPS further notes in paragraph 1.17 that the emerging draft NNNPS is capable of being an important and relevant consideration in the SoS's decision making process. As such, the Applicant will continue to monitor the progress of the NNNPS review process and incorporate any updates to the Project's application documentation where considered appropriate/helpful in due course.

[2] DfT Circular 02/2013 - *'The Strategic Road Network and the Delivery of Sustainable Development'* (September 2013) - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/237412/dft-circular-strategic-road.pdf

application. National considerations and, particularly, Government policies for aviation are likely to be particularly important and relevant, although local planning policies and other local considerations can also be material.

1.5.23 Sections 6, 7 and 8 of this Planning Statement consider the Project in the context of relevant national and local planning policies, and particularly within the overarching context of the ANPS and the NNNPS. Those sections demonstrate, when assessed against these relevant policies and other important and relevant considerations, that the Project benefits from strong policy support and is acceptable when considered against the tests provided.

Matters covered under separate legislative frameworks

1.5.24 Gatwick Airport is subject to several other regulatory controls, the existence of which is relevant to matters raised by, or to be controlled by a DCO. The List of other Consents and Licences (Doc Ref. 7.5) identifies a number of these controls that require GAL to obtain a further consent from a regulator (e.g. the Environment Agency) before carrying out a specific activity.

1.5.25 In addition to these further consents and licences, there is a significant amount of legislation and guidance that controls the carrying out of various construction activities and the various activities involved in operating an airport in England.

1.5.26 GAL will ensure compliance with all applicable laws at all stages of the Project. Following any amendments to applicable legislation or new relevant legislation, GAL will carry out a review and make any changes necessary to ensure compliance.

1.5.27 The separate legislative and regulatory frameworks particularly relevant to the operation of an airport in England include, but are not limited to, the following:

- **Airport regulation and economic licensing** – Gatwick is licensed to operate by the Civil Aviation Authority (CAA) under the Civil Aviation Act 2012. At airports, the CAA regulates airspace policy, safety, security and consumer protection and economics, such as service levels and charges to Gatwick's airline customers.

- **Noise Regulation** - By virtue of the Civil Aviation (Designation of Aerodromes) Order 1981, Gatwick Airport is a designated aerodrome for the purposes of Section 78 of the Civil Aviation Act 1982 ("CAA Act 1982"). Section 78 of the CAA Act 1982 provides for the regulation of noise and vibration from aircraft. For designated aerodromes, the Government considers it appropriate for it to take decisions on the balance between noise controls and economic benefits, reconciling the local and national strategic interests[3].

1.5.28 The provisions within Section 78 are wide ranging and include allowing the SoS for Transport to publish notices 'being requirements appearing to the SoS to be appropriate for the purpose of limiting or of mitigating the effect of noise and vibration connected with the taking off or landing of aircraft at the aerodrome'.

[3] See the Aviation Policy Framework (Cm 8584, March 2013) - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/153776/aviation-policy-framework.pdf

1.5.29 The controls at Gatwick are promulgated in the UK Aeronautical Information Publication[4] and include:

- noise abatement procedures for take-off and landing, including use of departure noise preferential routings, use of continuous descent and low power, low drag operating procedures for landing, and general prohibitions on certain areas not to be overflown;
- departure noise limits; and
- the imposition of further operating restrictions, movement limits and quota limits for aircraft operating within the night period.

1.5.30 Under the Environmental Noise (England) Regulations 2006, Gatwick is also required to provide Strategic Noise Mapping and Noise Action Plans every five years, in 2024, 2029, 2034, 2039, 2044, 2049 etc., and whenever a major development occurs affecting the existing noise situation. The Noise Action Plan process includes for consultation on the draft Noise Action Plan ahead of submission to DEFRA for approval.

- **Night Flights** - Gatwick is allowed to operate at night (defined as hours between 2300 and 0700 hours) but there are restrictions on the level of night-time noise that is allowed and the number of planes that can fly at night during the night quota period (NQP) (2330 to 0600). The Secretary for State has responsibility for setting night flight restrictions at Gatwick. This is set out in the in Government's 2017 Night Flight Restrictions for Heathrow, Gatwick and Stansted which cover the period to 2022 and has recently been extended to 2025 following consultation[5].
- **Modernising of airspace** – Whilst the Project does not require an airspace change, Future Airspace Strategy Implementation South (FASI-South) is a major review proposing to re-design airspace over London and the South-East to improve services and to reduce delays and the effects of noise. This work is being undertaken by National Air Traffic Services (NATS) in partnership with the Department for Transport (DfT) and the CAA and will be subject to its own consultation and consenting requirements under the Transport Act 2000 and the Civil Aviation Authority (Air Navigation) Directions 2023.
- **Climate Change** – Under the Climate Change Act 2008, the Government has powers to require the operators of critical national infrastructure to produce reports explaining how that infrastructure is adapted to be resilient to the effects of climate change. These provisions apply to Gatwick airport.
- **Green House Gas** - The amended Section 1 of the Climate Change Act 2008 sets a legally binding Green House Gas emissions reduction target for the UK of at least 100 per cent by 2050, compared to a 1990 baseline (the 'net zero' target). This revised target was introduced in 2019 as a change from the previous 80 per cent reduction target. To meet its commitment, the Government sets five-yearly carbon budgets and the Sixth Carbon Budget formally includes emissions from international aviation.

[4] See the UK Aeronautical Information Publication, London Gatwick entry, EGKK Section AD 2.21 Noise Abatement Procedures -

[5] The Government are currently consulting on night flight restrictions at Heathrow, Gatwick and Stansted airports beyond 2024 plus its future national night flight policy at designated airports - https://www.gov.uk/government/consultations/night-flights-restrictions-at-heathrow-gatwick-and-stansted-airports-beyond-2024-plus-national-night-flight-policy

1.5.31 The adoption of the legally binding net zero target in the UK under the Climate Change Act 2008 has recently been reflected for the transport and aviation sectors in the publication of the Transport Decarbonisation Plan (DfT, 2021a) and the Jet Zero Strategy (DfT, 2022) which sets out the UK Government's framework and plan for achieving net zero aviation in the UK by 2050. The Jet Zero Strategy sets out the Government's commitment to take any necessary action to ensure its carbon reduction commitments are met, including in relation to airport operations.

Overview of the Consultation Process

1.5.32 Pre-application consultation has substantially informed and enhanced the application. GAL has carried out pre-application consultation in accordance with the Planning Act 2008; Guidance on the Pre-application Process for Major Infrastructure Projects published by the former Department for Communities and Local Government (DCLG) (March 2015) and other relevant guidance.

1.5.33 The **Consultation Report** (Doc Ref. 6.1) explains how GAL has carried out statutory and non-statutory pre-application consultation. It sets out the issues that have been raised throughout the consultation process and how GAL has responded, including how the comments have influenced the final scheme that is proposed in the DCO application.

1.5.34 Consultation on GAL's long-term future proposals to grow the airport in line with Government policy of making best use of existing airport infrastructure began with publication of GAL's draft Master Plan in October 2018. The document explained how GAL believed the airport could meet the growing demand for air travel and presented three growth scenarios:

- **Scenario One**: Gatwick remains a single-runway operation using the existing main runway more intensively;
- **Scenario Two**: The existing northern runway is brought into routine use together with the main runway; and
- **Scenario Three**: Gatwick continues to safeguard land for an additional runway to the south.

1.5.35 Over 5,000 consultation responses were received on the draft Master Plan. The consultation feedback was carefully considered alongside current and emerging national aviation policies and GAL published its final Master Plan in July 2019[6].

1.5.36 Of the three scenarios, Scenario Two was progressed. After publishing the decision in the final Master Plan, GAL began work to evaluate the technical requirements of the proposals using an appraisal process (called Stage Two). Stage Two included an options appraisal for the design and layout of the various main components of the proposals. This considered the feasibility and potential impacts of each of the component parts. The process aimed to assess each option for suitability, operational viability, cost and environmental effects based on a number of criteria. After the appraisal process, the options identified as performing best against the criteria were taken forward to form the Project.

1.5.37 There has been one main statutory pre-application consultation. In Autumn 2021 (12 weeks from September to December 2021) GAL presented the Project proposals, the need for and benefits of the Project and preliminary information regarding the Project's likely environmental impacts and

[6] h[redacted]

how they could be mitigated. Feedback from the consultation guided GAL and helped GAL refine and revise the proposals and strategies for the Project. Thereafter, a hybrid statutory/non-statutory consultation was carried out which ran for six weeks from 14 June to 27 July 2022. A targeted, statutory consultation considered changes to the proposed highway improvement works. This involved amendments to the development boundary and included updated preliminary environmental information to identify the extent of any new or materially different significant environmental effects resulting from the changes to the highway improvement proposals. The non-statutory Project update that formed part of the consultation included proposed changes to other aspects of the proposals, namely car parking, the airfield, hotels and offices, and the strategies relating to water management, carbon, noise, as well as other Project updates (which were not considered to lead to any new or materially different significant environmental effects from those reported in the Preliminary Environmental Information Report (PEIR) provided with the Autumn 2021 Consultation).

1.6 Navigating the Application

1.6.1 The **Navigation Document** (Doc Ref.1.3) sets out which documents make up the DCO application and how they have been split into seven books as follows:

- **Book 1** – Application Information
- **Book 2** – Draft Development Consent Order
- **Book 3** – Compulsory Acquisition
- **Book 4** – Plans & Drawings
- **Book 5** – Environmental Information
- **Book 6** – Consultation Report
- **Book 7** – Other Reports

1.7 Structure of the Planning Statement

1.7.1 This **Planning Statement** is structured as follows:

- **Section Two: Gatwick Today** – provides an overview of the Project site and the surrounding area plus details of Gatwick's current operations and airport capacity.
- **Section Three**: **The Need for the Northern Runway Project –** provides a summary of the Need case for the NRP and explains why additional airport capacity is required at Gatwick Airport with reference to demand forecasts. This section also considers the operational and economic benefits of the Project.
- **Section Four: The Northern Runway Project Proposals** – provides a summary of the Project Description, including the surface access proposals plus details of the temporary construction infrastructure required and the indicative phasing for the construction works.
- **Section Five: The Development Consent Order Application** - provides an overview of the draft DCO and summarises the consents and powers which would be provided plus the means of securing mitigation through requirements and the Section 106 agreement.
- **Section Six: Policy Context** – sets out the relevant policy against which a decision on the DCO will be made.
- **Section Seven: Assessment Principles** – considers the Project against the general assessment requirements set out in the ANPS and NNNPS..
- **Section Eight: Planning Balance and Conclusions** – assesses the Project against the relevant topic specific aviation, networks and planning policies.

- **Section Nine: Planning Balance and Conclusions** – considers the acceptability of the proposed development by weighing in the balance its benefits against any adverse impacts once measures to avoid, reduce or compensate for such impacts have been accounted for.

2 Gatwick Today

2.1 Introduction

2.1.1 This section describes the area that will be required for the Project and provides information about how Gatwick operates plus the airport's existing infrastructure and facilities. **ES Chapter 4: Existing Site and Operation** (Doc Ref. 5.1) provides full information about the existing site and operations at Gatwick. This section also describes how GAL expects growth at the airport to continue post-COVID but without the Project.

2.1.2 Gatwick Airport is located between the towns of Crawley to the south and Horley to the north and approximately 25 miles south of central London.

2.1.3 The application site lies largely within the administrative area of Crawley Borough Council (CBC), however small parts of it lie within Mole Valley District (in the north-west), Reigate and Banstead Borough (to the north) and Tandridge District (to the north-east). The majority of the site is within West Sussex County, with small parts in the north being located in Surrey County.

2.1.4 Gatwick is within proximity to several other local authorities:

- Horsham District to the south-west;
- Mid Sussex District to the south;
- Wealden District to the south-east;
- Sevenoaks district to the east/north-east;
- The London Boroughs of Bromley, Croydon, Sutton, Royal Borough of Kingston upon Thames, as well as Epsom and Ewell District and Elmbridge District to the north; and
- Guildford District and Waverley District to the west/north-west.

2.1.5 A plan showing the location of the Project and the airport boundary in relation to the relevant administrative boundaries is provided as **Figure 1.2.2 in ES Chapter 1: Introduction** (Doc Ref. 5.2). With the exception of elements of the highway works, the Project lies within Crawley Borough.

2.1.6 The Order Limits for the DCO (the limits within which the Project is to be constructed and operated) are shown on the **Location Plan** (Doc Ref. 4.1). The land subject to the application for development consent extends to approximately 735 hectares.

2.1.7 Gatwick is located in the Coast to Capital Local Enterprise Partnership (LEP) area. The Coast to Capital LEP area has a total population of over 2 million people, covering an area of over 312,000 hectares. The LEP describes itself as being an area which *"boasts a strong economy worth £50.7 billion gross value added (GVA), making us the seventh largest local economy in England (in 2016)".* The LEP area is supported by the Coast to Capital Strategic Economic Plan 2018-2030, which is titled 'Strategic Economic Plan, Gatwick 360°'.[7]

[7] [redacted]

2.2 The Main Airport Site

2.2.1 London Gatwick Airport became an aerodrome in the 1930s and was formally opened as a passenger airport in 1958. Since that time, passenger numbers have grown to over 46 million passengers per year. In 2019 (the most recent full year of operation prior to the Covid pandemic), Gatwick served more destinations than any other UK airport and was the busiest daytime, single runway airport in the world.

2.2.2 The operation at Gatwick Airport is served by a single main runway and two terminals: North Terminal and South Terminal. When the main runway is unavailable, for example when it is undergoing maintenance work, the existing northern (standby) runway is used. The northern runway was used for 2,842 ATMs in 2019.

2.2.3 Gatwick is a major economic driver and pre-Covid supported over 135,000 jobs nationally in 2019, making a contribution of £8.3bn to the UK economy every year.

2.2.4 The airport boundary mostly includes land which is owned by GAL. It also includes some additional parcels of land which are not GAL owned (or are GAL owned but subject to long-term lease agreements) but these are still surrounded by or adjacent to GAL owned land.

2.2.5 Gatwick has excellent surface transport links. The airport's two passenger terminals are directly served by the M23 motorway spur off the M23, which runs approximately 1.7 km to the east of the airport. The A23 (London Road) also serves the airport.

2.2.6 Gatwick has its own dedicated railway station on the London to Brighton mainline railway. Gatwick has the largest rail catchment of any UK airport. Serving over 20 million rail journeys a year, it connects to more stations than any other European airport and is the busiest railway station in the South-East, outside central London's main terminals. Nearly 15 million people – more than a quarter of the population of England - can access Gatwick by road or rail within 60 minutes. 42% of passengers use the train for their trips to and from Gatwick. Gatwick has the highest percentage of passengers travelling by train of any major UK airport.

2.2.7 Gatwick's railway station is located at the South Terminal, where there is also a direct transit link from the railway station to the North Terminal via an automatic inter-terminal tracked transit system (ITTS). Both terminals provide access to local and regional bus and coach services.

2.2.8 Gatwick's airfield extends over an area approaching one third of the total land within the airport boundary, comprising the main and northern runways, numerous taxiways providing the ability for aircraft to move around the airfield, navigational and landing aids, and with extensive grass areas surrounding these facilities.

2.2.9 Gatwick's apron area comprises:

- aircraft parking stands;
- taxiways;
- fuel farm;
- piers; and
- support facilities (fire station, control tower, etc).

2.2.10 Gatwick's two passenger terminals offer the main passenger services such as check-in, security and baggage facilities, gates, immigration as well as offices, shops, restaurants, and welfare facilities.

2.2.11 The two terminals are served by six piers from which passengers embark and disembark aircraft (Piers 1, 2 and 3 at South Terminal and Piers 4, 5 and 6 at North Terminal).

2.2.12 Gatwick's Cargo Centre covers approximately 10ha and comprises cargo sheds, office accommodation, areas for HGV loading, unloading and parking, and open equipment parking areas. The cargo sheds are owned by a third party with a long-term ground lease.

2.2.13 There are four aircraft maintenance hangars - a British Airways operated hangar to the south of the runway, and three hangars to the north of the runway, including Hangar 7 and those operated by EasyJet and Boeing.

2.2.14 The airport includes many ancillary buildings and facilities which accommodate services needed to support the airport operation. These include:

- air traffic control tower
- vehicle and equipment engineering, storage and maintenance facilities;
- a number of hotels and offices;
- waste management facility;
- passenger and staff car parks;
- contractors' compounds;
- filling stations; and
- a police station.

Figure 2.1: Gatwick Airport Aerial View

2.3 Planning History

2.3.1 Gatwick was licensed as a public aerodrome in 1934[8] and was formally opened as a passenger airport in 1958. The site has an extensive planning history, with approximately 1,300 planning records listed on the CBC public planning register.

2.3.2 Recent planning applications determined within or near the Order Limits are listed in **Appendix A** to this statement. The list does not contain smaller applications that are not considered to be relevant to the proposals. The northern runway was granted planning permission in 1979 (application reference CR/125/79). Condition 3 of the planning permission provided that it could not be used simultaneously with the main runway. The simultaneous use of both runways was also precluded by a Section 52 Agreement with West Sussex County Council. However, the agreement expired in 2019.

2.4 Current Operations

Passenger Numbers, Air Traffic Movements and Recent Growth

2.4.1 More detailed information of the recent growth at Gatwick Airport is provided in Section 6 of the **ES Appendix 4.3.1** : **Forecast Data Book** (Doc Ref. 5.3).

2.4.2 Despite operating with a high degree of slot constraint, Gatwick still experienced significant levels of growth in the years leading up to the COVID-19 pandemic.

2.4.3 In the decade prior to the COVID-19 pandemic, Gatwick grew by over 14 million passengers, reaching 46.6 million in 2019. This 44% growth in passengers resulted in a 15% growth in commercial air traffic movements (ATMs)[9], reflecting the larger and fuller aircraft now in operation.

2.4.4 Whilst the COVID-19 pandemic led to a significant decline in passenger air traffic in 2020 and 2021, air traffic levels have shown a strong recovery.

2.4.5 In 2022, Gatwick's air traffic consistently reached over 80% of 2019's passenger volumes through the summer months. Recovery would have been even stronger had it not been for supply side challenges which limited airline and airport capacity during this typically peak period.

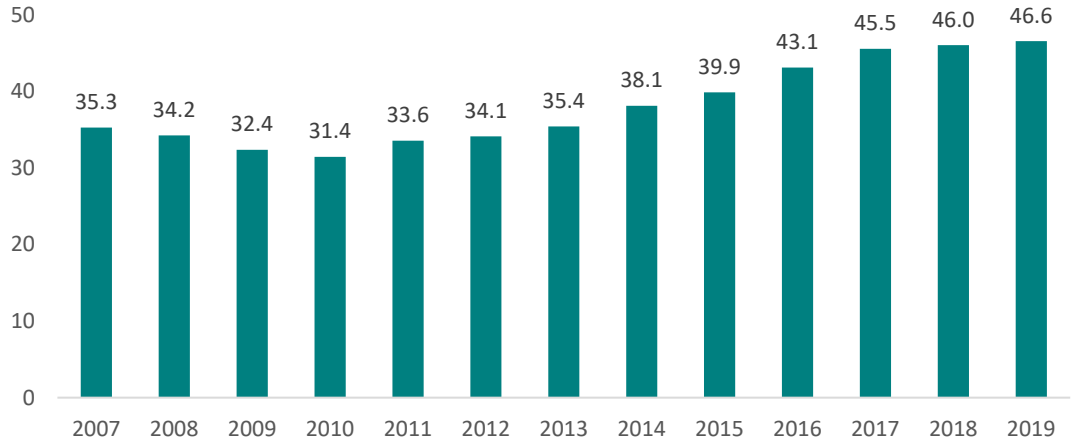
2.4.6 GAL expects traffic to recover further as the effects of the pandemic decline and is forecasting passenger levels to reach pre-pandemic levels in around 2025.

2.4.7 Growth in passenger and ATMs is shown in the graphs below (Figures 2.2 and 2.3):

[8] Gatwick Airport, Our History, Access 02/08/2019 [redacted]

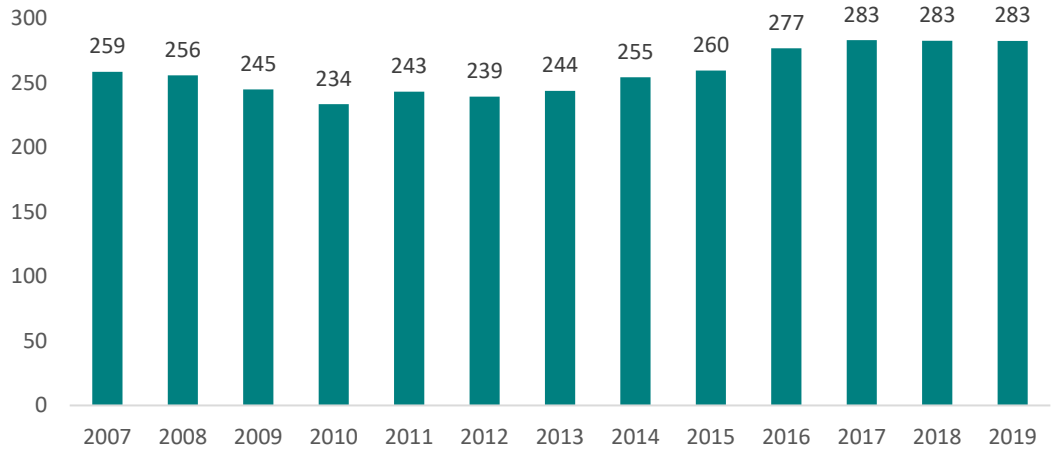
[9] Commercial air traffic movements (ATMs), or passenger ATMs, exclude non-commercial flights such as positioning flights and business aviation. In 2019, non-commercial flights accounted for approximately 1% of Gatwick's movements and are forecast to remain at about this level.

Figure 2.2 – Gatwick Airport Passengers (millions)



Source: CAA Statistics

Figure 2.3 – Gatwick Airport Air Traffic Movements (ATMs) (thousands)



Source: CAA Statistics

2.4.8 There have been three main characteristics of growth over the decade leading up to 2019:

1. **More passengers per flight:** Average passengers per aircraft movement grew from 132 in 2009 to 165 in 2019. This was driven by higher load factors (the percentage of seats filled), and an increase in the average size (and therefore number of seats) of aircraft used.

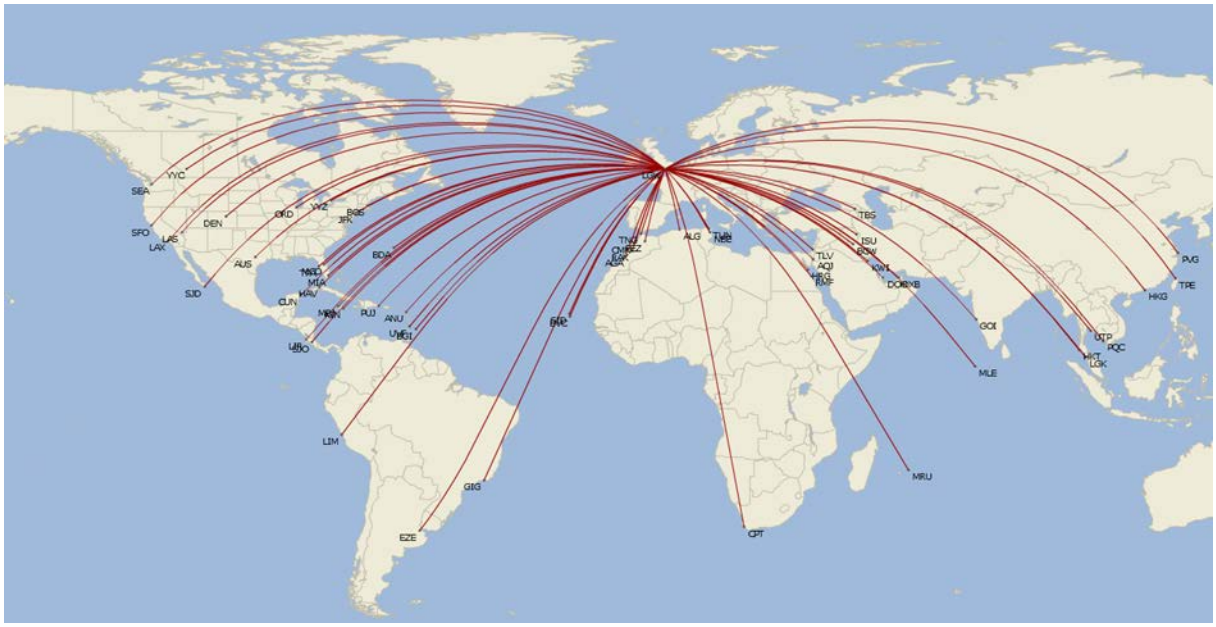
2. **Peak spreading:** There has been a change in the profile of flights over the year, with a higher level of growth in the traditionally quieter periods of the year. This 'peak spreading' makes use of spare capacity on the runway outside of peak months and leads to a higher level of annual utilisation of the existing assets on the airport. Gatwick is still busier in the summer months than the winter months and there is therefore further potential for peak spreading trends to continue.

3. **Growth in peak runway capacity:** The maximum number of scheduled aircraft movements that can be accommodated on the runway has grown from 53 an hour in 2012 to 55 an hour in 2019. This increase has been made possible due to improvements in operating procedures and air traffic management tools which improve the efficiency in the way arriving and departing aircraft use the runway.

Airlines and Destinations

2.4.9 During the period 2009-2019 domestic volumes remained relatively flat whilst over 10 million and 4 million passengers were added in the short haul and long-haul market categories respectively. The growth in short haul markets was driven by ongoing growth from low-cost carriers (LCCs)[10], which continue to account for a significant share of growth in the European aviation market. The long-haul growth has been driven by a number of new intercontinental markets being added by a range of carriers (full service and LCCs) as Gatwick continues to expand its long-haul connectivity (see Figure 2.4 below):

Figure 2.4: Gatwick Routes (outside Europe)



Source: IATA Schedules, March 2020

2.4.10 Whilst demand in the short-haul market is well distributed between London's airports, only Gatwick provides any substantial alternative to Heathrow for the long-haul market segment. Heathrow accounts for over 80% of demand, whilst Gatwick achieves a 17% share with the remaining airports accounting for the final 3%. This residual share mainly reflects 'mid-haul' markets (e.g. Israel) operated by a combination of LCCs and full-service carriers.

2.4.11 However, given that a significant share of Heathrow's long-haul traffic is for passengers connecting between flights (i.e. not London demand), Gatwick is estimated to achieve a share

[10] LCCs = Low-Cost Carriers (e.g. easyJet, Ryanair etc.)

approaching 25% for the 'local' London 'origin and destination' long haul demand (i.e. passengers with a 'true' origin or destination as London).

2.4.12 Other airports such as Luton do not have the runway capabilities to serve many long-haul markets. Although several global hub carriers such as Emirates, Qatar Airways and Cathay Pacific serve the wider London catchment by operating from a combination of airports, when airlines choose to expand their presence within the London market, Gatwick is the clear favourite (after Heathrow).

2.4.13 For example, Emirates has served Gatwick for over 25 years. With the Heathrow operations as their main base, they have also maintained a strong Gatwick presence with around 1m passengers per year carried in 2019. Qatar Airways expanded their London operations and returned to Gatwick in 2018 now accounting for 0.4m passengers per year. Cathay Pacific have also chosen Gatwick to expand their London presence with the launch of services also in 2018.

2.4.14 EasyJet is a key carrier in the London market, now accounting for over 30m passengers per year. Following their initial launch at Luton and widening their London presence to include other London airports, by 2005 their capacity was evenly spread across the likes of Gatwick, Luton and Stansted with approximately 5m passengers at each airport.

2.4.15 Between 2005 and 2015, easyJet prioritised their growth at Gatwick over the other London airports. By 2015, easyJet had added 12.3m passengers at Gatwick to reach 17m, whilst at Luton and Stansted their demand had reduced by 160,000 and 2.3m respectively.

2.4.16 Gatwick now accounts for 63% of easyJet's London operation up from 32% in 2005. Some of this growth was enabled by easyJet's purchase of the Thomas Cook slots at Gatwick following the insolvency proceedings.

2.4.17 Global air travel has been revolutionised over the last two decades by the trend towards 'low-cost' airlines. Supported by the deregulation of aviation markets within Europe and elsewhere, this trend has continued, and low-cost airlines have opened up new routes and destinations to business and leisure travellers, stimulating a long period of growth in air traffic. Initially this growth took place in short-haul markets where operating economies could easily be gained by flying aircraft more intensively on multiple routes every day. This drove up aircraft utilisation, allowing air fares to be reduced whilst still achieving profitable operations. More recently, the introduction of more fuel-efficient long-haul aircraft is allowing airlines to extend the low-cost model to a wide range of long-haul destinations.

2.4.18 Gatwick has been at the forefront of this low-cost revolution. In the past ten years, it has seen passengers on low-cost airlines grow from less than 30% of the total throughput to 62% today. The increasing number of airlines serving this market is undoubtedly a big factor driving growth at Gatwick, and it has also stimulated the wider London market with lower fares and greater choice.

2.4.19 Gatwick is playing a key role in the emergence of low-cost, long-haul services, supporting an expanding network of such routes and new entrant airlines. Several of the largest European airline groups have also established low-cost brands, such as Eurowings by Lufthansa group.

2.4.20 In addition, demand remains for full-service airlines and these airlines also have growth plans. Recent applicants for slots at Gatwick include existing airlines seeking to grow both short-haul (Wizz Air, Ryanair, easyJet, Vueling) and long-haul (China Eastern, WestJet) plus new airlines

seeking to enter the Gatwick short-haul market (SunExpress, SAS, Alitalia) and long-haul (China Southern to China, Vistara to India and JetBlue to USA).

2.4.21 Gatwick continues to support and invest in the growth of both low-cost and full-service airline groups, operating across short-haul and long-haul routes. This is seen as key to its future ambition and continued success.

London Market

2.4.22 London is the biggest aviation market in the world in terms of passenger numbers. In 2018, the five main London airports handled 176 million passengers. This is more than New York, Tokyo, and Shanghai, the next three largest markets, and a large part of this stems from the size of London itself as well as the leading role it plays in global commerce, tourism and international connectivity. Since being sold by BAA, Gatwick has increased its share of passengers travelling to and from London airports, successfully competing to attract new airlines, and new routes to the UK's key trading partners as well as leisure destinations. In 2019, Gatwick had a 26% share of the London aviation market.

2.4.23 Gatwick Airport is unique amongst London's airports as it accommodates significant numbers of full-service, low-cost, charter and regional airlines. This diverse range of carriers help support a large route network, and GAL has successfully added new long-haul destinations such as Buenos Aires, Shanghai and Singapore to that network, contributing to the 1 in 5 long haul passengers that Gatwick flies. Gatwick has the largest base for easyJet in Europe, who accounted for 19m passengers at Gatwick in 2019 and 41% of flights.

Night Flights

2.4.24 Whilst Gatwick is allowed to operate at night (defined as hours between 2300 and 0700 hours), there are restrictions on the level of night-time noise that is allowed and the number of planes that can fly at night during the night quota period (NQP) (2330 to 0600). This is set out in the in Government's 2017 Night Flight Restrictions for Heathrow, Gatwick and Stansted which cover the period to 2022 and has recently been extended to 2025 following consultation[11].

2.4.25 On average, Gatwick has 45-50 flights during the NQP in the summer, and 18-20 during the NQP in the winter.

2.4.26 Night flights play an important part of Gatwick's airlines' operating models. They allow routes to be flown which would not otherwise be viable, for example by allowing aircraft to make several rotations every day – a vital way of ensuring the economic viability of the airlines' operations, particularly for low-cost operators.

Passenger Catchment

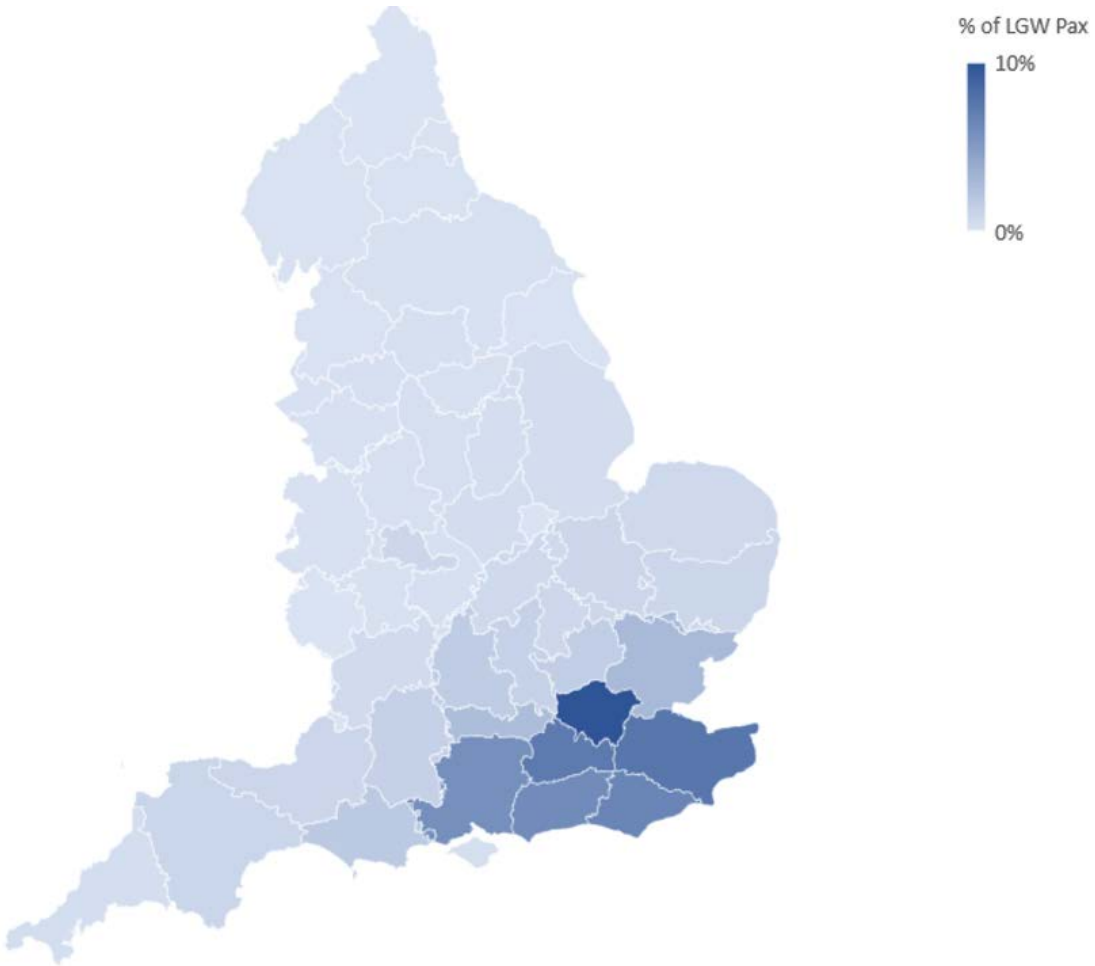
2.4.27 Gatwick's proximity to London and surface access links to the wider South East (and beyond)

[11] The Government are currently consulting on night flight restrictions at Heathrow, Gatwick and Stansted airports beyond 2024 plus its future national night flight policy at designated airports - https://www.gov.uk/government/consultations/night-flights-restrictions-at-heathrow-gatwick-and-stansted-airports-beyond-2024-plus-national-night-flight-policy

provide a wide catchment area. Recent analysis by Gatwick estimates a population of 17m people within 90 minutes of the airport. According to CAA Survey data[12], 81% of Gatwick's terminating passengers (i.e. excluding transfer passengers) were travelling to/from destinations in London or the South East. Greater London is the largest source market (42%), but the nearby counties Kent, Surrey and Sussex account for a further 27%. Of the 19% of passengers travelling to/from destinations outside of the South East, the majority were travelling to the East or South West of England.

2.4.28 Gatwick's core catchment area (Figures 2.5 and 2.6) includes the surrounding counties and south London boroughs where Gatwick attracts the highest share of inbound and outbound passengers. In 2019, Gatwick achieved a 53% share in these areas compared to 29% for Heathrow, 10% for Stansted and 5% for Luton. Higher market shares (>60%) were achieved for the short haul market segment and Gatwick is the number one London airport for local short haul traffic (i.e. excluding transfers). Figure 2.7 shows travel times to the airport based on car and public transport.

Figure 2.5 Gatwick's Catchment (a)



[12] CAA Survey statistics from 2018 were used

Figure 2.6: Gatwick's Catchment (b)

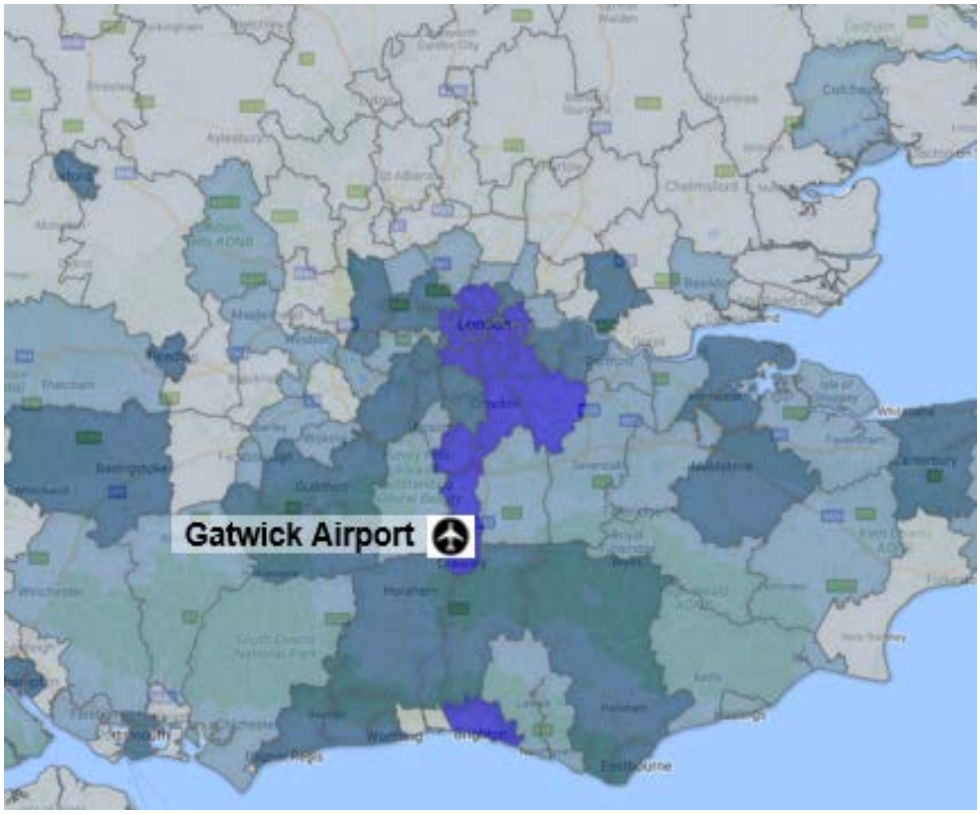
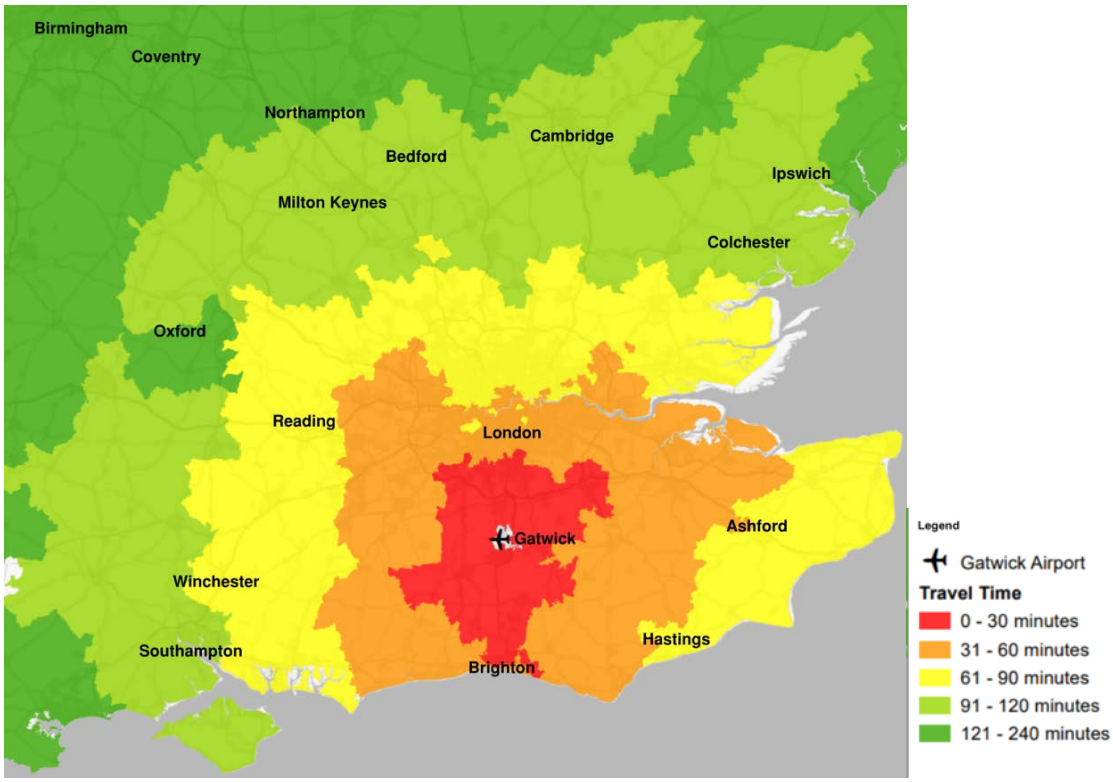


Figure 2.7 – Travel Times to Gatwick Airport (Car and Public Transport)



2.4.29 Geographically, Gatwick serves a more distinct catchment area when compared to Stansted, Luton and Southend and, when compared to these airports, Gatwick has faster transport links to central London destinations.

Air Cargo

2.4.30 The supply side dynamics of the routes and carriers play a pivotal role in Gatwick's cargo performance with long-haul widebody movements to markets such as Asia and the Middle East providing significant opportunity.

2.4.31 Gatwick's cargo performance has been increasing in recent years reflecting the growth in the number of long-haul markets and carriers and the greater hold capacity of long-haul aircraft. In 2019/20 Gatwick airlines carried 150,000 tonnes.

2.5 Current Airport Capacity

2.5.1 The airport is not currently controlled by a 'limit' on the total number of passengers, or the number of ATMs that are permitted each year.

2.5.2 Today, Gatwick can handle 55 scheduled aircraft movements an hour on its main runway. This has grown from 53 an hour in 2012. This increase has allowed more flights, including during the busy summer period. In peak summer months (July, August, September) Gatwick is already operating with little or no spare capacity.

2.5.3 Demand for landing and take-off slots, especially in the peak summer period is heavily oversubscribed and an active secondary slot market has now emerged. This means that additional capacity that is made available is rapidly taken up by airlines.

2.5.4 When permission was granted for the North Terminal in 1978, restrictions were placed on the use of the northern runway (referred to as the 'emergency runway') by a legal agreement and a planning condition. These prevented operation of both runways at the same time. The legal agreement expired in August 2019 but the operating restriction is still in place because the planning condition still remains. The DCO application proposes to remove this condition.

Growth without the Northern Runway Project

2.5.5 Even without the Northern Runway Project (referred to as the 'Baseline Case'), Gatwick will continue to experience growth in passengers and ATMs. The Baseline Case represents the airport as it is expected to develop and operate if development consent is not granted for the Project. In this case, some further growth in airport passengers and air traffic movements would still occur on the existing runway in the years ahead, but not as much growth as would occur under the Northern Runway Case (see Section 8.2 in **ES Appendix 4.3.1: Forecast Data Book** (Doc Ref. 5.3). In the Baseline Case, it is estimated that the airport will be able to handle approximately 326,000 commercial ATMs in 2047, reflecting an increase of around 10% compared to the 2019 throughput.

2.5.6 Growth will come from demand across Gatwick's core and wider catchment which is forecast to

grow in line with wider UK aviation projections of around 1.7% in the long term 2018-2050[13]). Ongoing supply side trends, including larger and fuller aircraft and growing runway utilisation in off-peak periods will continue to deliver increased annual throughput.

Currently Consented Projects and Projects under Construction

2.5.7 The following developments are currently consented or under construction and would proceed in the absence of the Project;

- a western extension to Pier 6, increasing the number of pier-served stands from 9 to 17. As part of these works, limited changes to existing stands and alterations to Taxiway Quebec are required where these are located in the area of the proposed pier extension;
- provision of an additional rapid exit taxiway from the main runway, which will improve resilience of operations;
- two new multi storey car parks – a 820-space car park at South Terminal Hilton Hotel and a 3,250-space car park at North Terminal (MSCP7);
- use of robotic technology within existing South Terminal long-stay parking areas to increase capacity, resulting in an additional 2,500 spaces;
- an electric vehicle charging forecourt is currently under construction on a site to the west of the Marriott Hotel at the South Terminal;
- proposed highway improvements include local widening on the junction entry/exit lanes for both the North Terminal and South Terminal roundabouts, together with signalisation of the roundabouts and provision of enhanced signage. These works are expected to be undertaken in collaboration with National Highways and are currently expected to be completed by 2029; and
- improvements being undertaken by Network Rail to the Gatwick Railway Station which will almost double the size of the station concourse, provide additional lifts and escalators and improve access to the platforms. This project is underway and scheduled to complete in late 2023.

2.5.8 In addition, normal or planned maintenance of existing facilities, including resurfacing of the main and northern runways and replacement of ILS navigational equipment, will continue.

2.6 Growing Sustainably

2.6.1 Sustainability has been a key part of Gatwick's transformation since 2009. GAL continues to work towards being the UK's most sustainable airport.

2.6.2 GAL's overarching vision for Gatwick is for it to be the airport of the future and a model for sustainable growth. GAL launched its first ten year 'Decade of Change' Sustainability Strategy in 2010[14]. It set out GAL's commitment to operate and develop Gatwick in a sustainable way, combining responsible environmental management with strong community programmes. GAL monitors and reports on its performance every year and publishes annual reports on its website.

[13] 2018 has been chosen to remain consistent with the Jet Zero presentation of +70% demand growth vs a 2018 baseline.
[14] [redacted]

2.6.3 There were ten action plans[15] which contained GAL's goals and the actions being taken or projected at the time to deliver the obligations in the existing Section 106 Agreement and GAL's 2010 Decade of Change Sustainability Policy. The action plans covered: air quality, biodiversity, carbon, community, energy, local economy, noise, surface access, waste, and water quality and consumption.

2.6.4 GAL published its second Decade of Change Sustainability Policy in June 2021[16]. This runs to 2030 and builds on the success of the first Decade of Change Strategy.

2.6.5 The approach to a sustainable Gatwick remains focused on:

- **People and Communities** - Support our people and invest in our local communities.
- **Net Zero Emissions** - Continue our transition to Net Zero and improve air quality.
- **Local Environment** - Reduce our impact on the local environment and waste.

2.6.6 In addition to addressing local environmental impacts, GAL also recognises fully the urgency of tackling global climate change and reducing global greenhouse gas emissions, to which aviation is a major contributor.

2.6.7 GAL strongly supports the UK Government in taking a lead by becoming the first country in the world to set a legally binding net zero commitment for greenhouse gas emissions in 2050, which includes the UK's share of international aviation emissions.

2.6.8 GAL is committed to low-carbon growth. Its first Decade of Change policy set a commitment to achieve 50% reduction on 1990 Scope 1 and 2 emissions by 2020 - a target GAL achieved two years ahead of schedule. In 2017, Gatwick also became the first of the London airports to achieve carbon neutrality through use of 100% renewable electricity and Gold Standard carbon credits to offset ground fuel emissions. The Second Decade of Change Sustainability Policy took these commitments further, including to achieve 80% reduction on 1990 Scope 1 and 2 emissions by 2030[17] with a longer-term goal to achieve 'net zero' before 2040.

2.6.9 The **Carbon Action Plan** submitted as part of the DCO application in **ES Appendix 5.3.6** (Doc Ref 5.3) sets out the further actions that GAL is committing to take to fully play its part in supporting and accelerating the reduction in carbon emissions as part of both current operations and with the proposed Project, committing to the following outcomes insofar as this relates to Airport Buildings and Ground Operations (ABAGO):

- Gatwick will achieve Net Zero for GHG emissions under its control (GAL Scope 1 and 2) by 2030.
- Gatwick will achieve zero emissions for GAL Scope 1 and 2 GHG emissions by 2040, contributing to the UK Government's Jet Zero ambition "*for all airport operations in England to be zero emissions by 2040*". GAL will update this commitment when the policy for "airport operations" in the Jet Zero strategy is finalised and published by UK Government.
- GAL will actively support the reduction of Scope 3 emissions arising from ABAGO.

[15] [redacted]

[17] Power and energy used on site and in our operational vehicle fleets and equipment.

2.7 Gatwick in the Community

2.7.1 As part of its approach to sustainable growth, GAL has developed a strong programme of community investment and plays a vital role in the regional economy, while working to address the social and environmental issues that matter to local people. In growing the airport, GAL wants to continue to invest in its community through continued funding so that communities can benefit fully from the effects of the growth proposals. Some of the key initiatives that GAL currently deploys are:

- **Gatwick Airport Community Trust** - Gatwick Airport Community Trust (GACT) is an independent charity set up by the Section 106 agreement between West Sussex County Council, Crawley Borough Council and Gatwick Airport.

  The Trust is dedicated to supporting local communities through the funding of projects within those communities most affected by the airport and our operations. Currently, each year, GAL makes an annual donation to the Trust in excess of £200,000. Between 2016 and 2021, £1.326m was donated (£2.266m between 2011 and 2021). Local community groups and charities can apply for grants for specific projects. In 2020, £228,651 was awarded in grants to different projects.

  The majority of grants ranged from £1,000 to £5,000 and beneficiaries ranged from scout groups and village halls to sports clubs, choirs, theatre groups, pre-schools, the elderly and people with disabilities.

  The aim is to merge this fund and the Gatwick Foundation Fund (see below) to create one, new, single Gatwick Community Fund which will be secured through the new NRP Section 106 Agreement as part of the DCO consent (see more information is Sections 5 and 8 of this document).

- **Gatwick Foundation Fund** – funding grants are awarded to local projects and community groups. Grants are split equally between Surrey, Sussex and Kent. 236 organisations and 105,000 local people have benefitted from this fund since its launch in 2016. Through the Foundation Fund, over £1m has been awarded to local projects and community groups since 2016. The fund is managed in partnership with the Community Foundations for Kent, Surrey and Sussex. The projects supported by the Gatwick Foundation Fund are focused around four main areas:

  1) Employment, training and skills - helping people to gain confidence through training and development of new skills.

  2) Families - supporting families and children in need and projects which combat social isolation and disadvantage.

  3) Widening horizons - supporting projects which provide young people with opportunities that they would not otherwise have and to help them to widen their experiences and aspirations.

  4) Elderly people - improving access to facilities and reducing isolation for the older generation.

The aim is to merge this fund and the Gatwick Community Trust (see above) to create one, new, single Gatwick Community Fund which will be secured through the new NRP Section 106 as part of the DCO consent (see more information is Sections 5 and 8 of this document).

- **Gatwick Greenspace Partnership** – GAL works closely with Gatwick Greenspace, which benefits people, wildlife and the countryside. Gatwick Greenspace is one of the Sussex Wildlife Trust's Living Landscape projects and works across 200 square kilometres of countryside between Horsham, Crawley, Horley, Reigate and Dorking.

  Its aim is to inform, educate and involve a diverse range of people and work with local landowners including the Forestry Commission, the Wildlife Trusts and the Woodland Trust, plus local authorities to support them in managing their land more sustainably and in partnership with others.

  GAL has supported the Gatwick Greenspace Partnership with the introduction of an Assistant People and Wildlife Officer overseeing habitat management and coordinating volunteers who help maintain and improve the 75 hectares of woodland, grassland and wetland around the airport.

  As part of this Project, it is proposed to continue to support this initiative via the new NRP Section 106 Agreement (see more information is Sections 5 and 8 of this document).

- **Sustainable Transport Fund –** the existing Section 106 Agreement (2022) requires GAL to set aside funds to be used for initiatives that promote travel by staff and passengers to the airport by modes transport other than the private car (known as the 'Sustainable Transport Fund'.) The existing fund promotes initiatives that encourage the use by passengers and staff travelling overland to and from the airport of modes of transport other than the private car and, with regard to staff travel, the encouragement and promotion of car sharing. Funds are currently based on the sum of a monthly charge for each pass validated for entry to a staff car park operated by or on behalf of the airport and a levy on the total supply of spaces in public car parks operated or available for operation by or on behalf of the airport plus a percentage of the total fees collected each year from the drivers of vehicles using the terminal forecourt passenger drop-off zones and 100% of the funds generated through fines for red route contraventions. Funds raised from staff and public car park spaces in 2017/18 were £1.527m.
  As part of this Project, it is proposed to continue to support this initiative via the new NRP Section 106 Agreement (see more information is Sections 5 and 8 of this document).

- **Community Engagement –** GAL currently engages in a variety of ways to find out about what matters to people; and keep them up to date about airport issues. GAL also works with community groups and industry bodies on a range of issues of interest and concern.

  One of the ways that GAL is able to participate in community debate is through the Gatwick Airport Consultative Committee (GATCOM), the airport's formal consultative body. GATCOM has 32 committee members from groups across the region, representing a wide range of interests, including civil aviation, passenger service, business development, tourism and environmental issues. GATCOM meets quarterly.

GAL also hosts regular engagement events for local community representatives, providing an opportunity to meet members of the Gatwick team to discuss the issues that are most important to local people. It also keeps the community up to date with a newsletter.

GAL engages with three other key groups on airspace and noise matters, this includes the Noise and Track Monitoring Advisory Group (NaTMAG) and its subgroup the Gatwick Noise Monitoring Group (GNMG) along with the Noise Management Board (NMB).

GAL will continue to regularly engage with GATCOM, the NMB, the GNMG and the NaTMAG if the DCO for the Project is consented. This will be secured as part of the new NRP Section 106 Agreement (see more information is Section 5 of this document).

3 The Need for the Northern Runway Project

3.1 Introduction

3.1.1 The application is supported by a separate **Needs Case** (Doc Ref. 7.2). In addition, a detailed **Forecast Data Book** is provided as **ES Appendix 4.3.1** (Doc Ref. 5.3). The **Needs Case** sets out the need for the Project under six principal headings:

- Policy context
- Recent growth and current operations
- Need for growth at Gatwick in response to passenger demand
- Future Demand Forecasts
- Resilience and Operations benefits
- Economic benefits

3.1.2 Aspects of these matters are covered elsewhere in this Planning Statement and it would not be appropriate to replicate the full Needs Case here. Instead, a summary is set out below and signposting provided to where more detailed information can be found in the application documents.

3.2 Policy Context

3.2.1 Government policy is clear about the critical importance of aviation to the nation's economic health and the UK's status in the world. The most up to date statement of policy is the publication *Flightpath to the Future*, which sets a medium-term strategic framework for UK aviation and explains that "*a central aspect of achieving our future ambitions will be to continue to enhance our global aviation impact. At the heart of aviation is facilitating travel internationally to connect people, goods and businesses across the globe. The UK will promote and improve its global connectivity to facilitate sustainable growth*." Consequently, "*The Government is committed to growth. We will work closely with industry to continually assess how we can best support sustainable recovery and a bright future for UK aviation*." [18]

3.2.2 However, the UK's aviation sector is capacity constrained. In 2012, aware of the severity of the issue and the damage to the UK that a lack of capacity causes, the Government appointed the Airports Commission to assess and recommend how capacity constraints could be addressed. The findings were unequivocal:

> "*Across all scenarios considered, including where the UK is meeting its climate change targets, there is significant growth in demand for aviation between now and 2050, placing additional pressure on already stressed airport infrastructure in London and the South East. The London airport system is forecast to be under very substantial pressure in 2030….problems are starting to emerge and are likely to get worse. Heathrow is effectively full. Gatwick is operating at more than 85% of its maximum capacity and is completely full at peak times. Capacity*

[18] Flightpath to the Future, May 2022 pages 18 and 19 - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1079042/flightpath-to-the-future.pdf

constraints are making it more and more difficult for airports and airlines to operate efficiently."[19]

3.2.3 However, more than a decade later, growth in demand has continued but little additional capacity has been consented. The Government's policy approach is clear:

> *"The UK now faces a significant capacity challenge. Heathrow Airport is currently the busiest two-runway airport in the world, while Gatwick Airport is the busiest single runway airport in the world. London's airports are filling up fast and will all be full by the mid-2030s if we do not take action now."* [20]

3.2.4 The same message has been consistently conveyed through a series of government policy statements, details of which are set out in Section 2 of the Needs Case (Doc Ref. 7.2). The policy statements are recent and up to date. The strength of the policy support is not diluted by other principal objectives of government policy, for example, in relation to climate change. Up to date policy for aviation and for climate change together emphasise that the additional capacity required in UK aviation can be achieved consistent with the Government's binding commitments to carbon reduction made under the Climate Change Act 2008.

3.2.5 The Government's Transport Decarbonisation Plan set out government's commitment to accelerate decarbonisation of the aviation sector at the same time as recognising that "*international connectivity is a vital part of Global Britain*".[21]

3.2.6 Policies for decarbonisation of the sector are set out in more detail in the Government's Jet Zero Strategy, which confirms that the strategy is to decarbonise in a way that preserves the benefits of aviation and that the Government remains committed to growth in the aviation sector:

> *"Our approach to sustainable growth is supported by our analysis (set out in the supporting analytical document) which shows that we can achieve Jet Zero without the Government needing to intervene directly to limit aviation growth. The analysis uses updated airport capacity assumptions consistent with the latest known expansion plans at airports in the UK. The analysis indicates that it is possible for the potential carbon emissions resulting from these expansion schemes to be accommodated within the planned trajectory for achieving net zero emissions by 2050, and consequently that our planning policy frameworks remain compatible with the UK's climate change obligations."* [22]

3.2.7 As explained further below, this analysis included the assumed growth of Gatwick (for which it

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[19] Interim report of the Airports Commission, 2013, Executive Summary - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/271231/airports-commission-interim-report.pdf

[20] Airports NPS 2018 paragraph 2.11 - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/858533/airports-nps-new-runway-capacity-and-infrastructure-at-airports-in-the-south-east-of-england-web-version.pdf

[21] Transport Decarbonisation Plan – a better, greener Britain, Department for Transport, 2021 available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1009448/decarbonising-transport-a-better-greener-britain.pdf

[22] Jet Zero Strategy – delivering net zero aviation by 2050, Department for Transport, 2022 available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1095952/jet-zero-strategy.pdf

assumes a maximum capacity of 386,000 air transport movements, which is directly consistent with Gatwick's own assessment for the NRP).[23]

3.3 Recent Growth and Current Operations

3.3.1 As set out in Section 2, despite peak capacity constraints, Gatwick has seen significant levels of growth in the recent years, prior to the Covid-19 pandemic. Over the last decade, the number of passengers served grew by over 14 million passengers, reaching 46.6 million in the most recent full year of operations (2019). This represents a 44% growth in passengers since 2009, resulting from 15% growth in commercial air transport movements combined with the use of larger and fuller aircraft.

3.3.2 Despite capacity constraints, throughput at Gatwick grew by more than at any other UK airport in the 5 years to 2019 and, whilst the pandemic seriously affected Gatwick and all other airports, recovery has been rapid with a return to more than 80% of passenger numbers by the summer of 2022. At Gatwick, demand demonstrably exceeds supply – to the extent that there is a severe shortage of take-off and landing slots, with 21 airlines allocated less than 40% of their requested demand. A secondary market has developed with slot premiums increasing and costs being passed on to passengers through increased fares, directly contrary to government objectives.

3.3.3 The maximum number of scheduled aircraft movements that can be accommodated on the runway has grown from 53 an hour in 2012 to 55 an hour in 2019. This increase has been made possible due to improvements in operating procedures and air traffic management tools which improve the efficiency in the way arriving and departing aircraft use the runway. This intensity of movement is not achieved at any other airport.

3.3.4 In the last full year of operations before the pandemic (2019) Gatwick achieved a throughput of 283,000 commercial Air Transport Movements (ATMs), serving over 46.6m passengers travelling to 219 destinations with 53 different airlines.

3.4 Need for growth at Gatwick in response to passenger demand

3.4.1 Gatwick is the 8th busiest passenger airport in Europe. Gatwick's network is the most extensive of all the London airports. In 2019 Gatwick served 219 destinations compared to 211 at Heathrow,185 at Stansted and 139 at Luton. Gatwick is the second ranked airport in the London system for long haul (non-Europe) connectivity with 62 destinations compared to 2 at Luton and 7 at Stansted. Gatwick Airport has become a key piece of national infrastructure, an economic engine for local and regional growth, and the airport of choice for millions of passengers.

3.4.2 GAL is aware of demand from passengers and airlines for an increase in flights and airport operations at Gatwick. Further below in this section, information is provided to show the urgent level of unmet demand for new slots at Gatwick today, against the background of government forecasts for the short, medium and long term growth in passenger demand.

3.4.3 In the absence of the NRP, Gatwick can continue to achieve incremental growth. Growth in the

[23] Jet Zero: Modelling Framework, Annex D. March 2022.avaialble at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1061972/jet-zero-modelling-framework.pdf

Baseline Case from the current 46.6 mppa to the future forecast of 67.2 mppa in 2047 in the absence of the Project is anticipated to come from underlying demand and a continuation of the factors which have enabled growth in recent years:

- **Growth in capacity at off-peak times:** in the summer months (July, August and September), Gatwick is often already operating at, or close to, its peak capacity. In the Baseline Case, GAL is anticipating only modest growth during this period as daily commercial ATMs are forecast to increase by 6% from an average of around 900 in 2019 to 946 in 2047. For the total summer season (April-October), daily commercial ATMs are forecast to increase 9% from an average of 851 in 2019 to 927 in 2047. In contrast, the less utilised winter period is forecast to increase from an average of 666 in 2019 to 842 by 2047. By 2047, this represents an increase of 27% versus 2019. For context, Gatwick's winter utilisation has increased by 15% in just the 5 years to 2019 as daily commercial ATMs have grown from 579 to 666.
- **Up-gauging of the fleet over time to larger aircraft**: the second important and year-round factor that will enable passenger growth is a continuation of the trend for airlines to up-gauge their fleets with larger aircraft. Seats per ATM are expected to increase from an average of 192 in 2019 to 224 in 2047.
- **Higher average load factors**: allied to the increase in average aircraft size is a predicted increase in average seat occupancy rates across the year, also referred to as load factors. In 2019, average load factors ranged between 78-92% (averaging 86%) across the year. Over the next 20 years load factors are forecast to increase at a slower rate. By 2047 and beyond, average load factors are forecast to increase more modestly to 92%, which is comparable to Gatwick's most efficient carriers operating today.

3.4.4 Over the forecast period limited 'new' runway capacity is assumed as the current maximum throughput of 55 ATMs/hour is assumed to remain in the future. However, there is scope to improve performance and achieve these levels of throughput on a more consistent basis throughout the day. In the busiest days it is therefore expected that the number of hours where the runway will be scheduled to handle 55 movements will increase from 2 hours per day in 2019 to 6 hours per day in 2038 and 2047.

3.4.5 As a result of these increments in capacity, in the absence of the Project, the 2019 passenger throughput of 46mppa is forecast to grow with the resulting annual passenger volumes passing pre Covid levels in 2025 when they reach 48mppa before growing to 62m in 2038 and 67m in 2047. That growth would increase pressure on existing airport operations and there would be an increase in forecast delays at the airport and a continuing lack of resilience. Without the NRP these issues will not be addressed and Gatwick will fail to meet its inherent demand and fail to significantly contribute to the acute lack of capacity in the South-East.

3.5 Future demand and forecasts

3.5.1 Compared to Luton and Stansted, Gatwick is by far the most 'oversubscribed' airport for applications by airlines for take-off and landing slots (see Figure 3.1 below).

3.5.2 Whilst Luton is applying for increased capacity, Luton's slot requests currently fit within its available capacity, and Stansted's fit with a few exceptions during the peak hours. However,

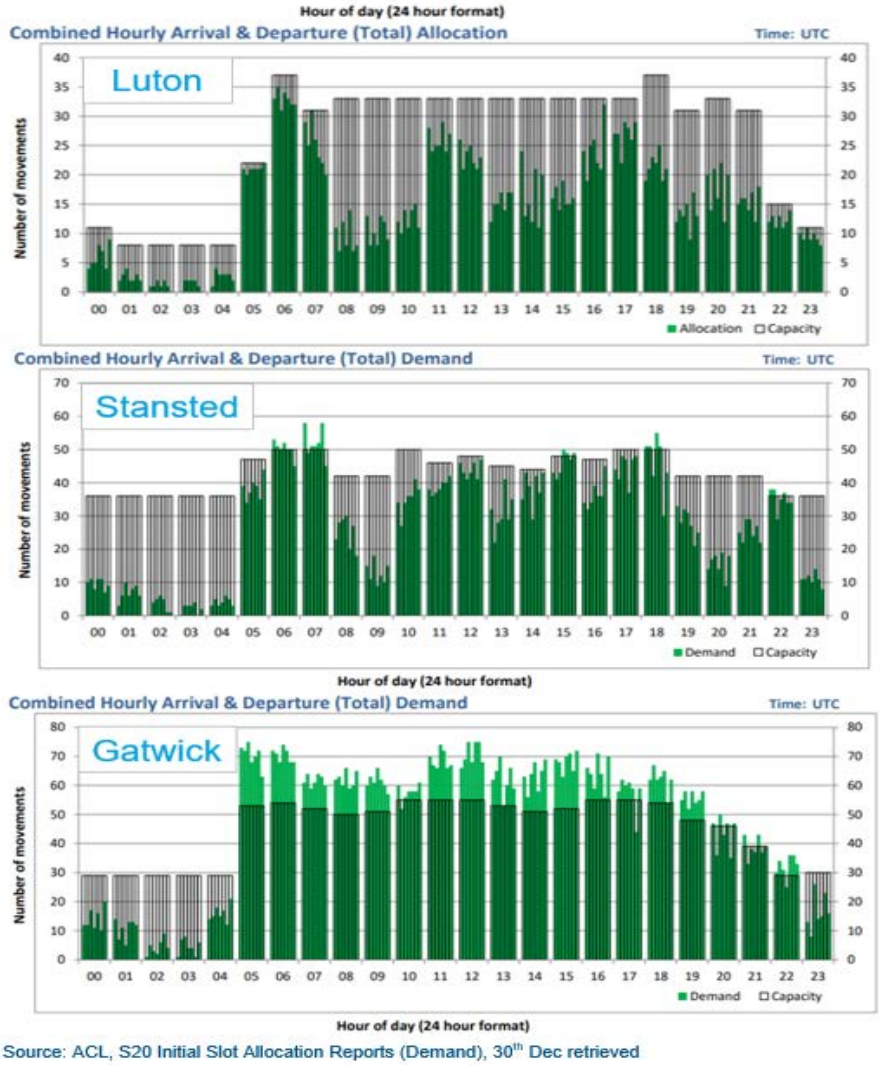
Gatwick's slot requests exceed the capacity in virtually all hours of the day. This limits growth such that, in recent years, growth has mainly only been able to occur through peak spreading and larger/fuller aircraft.

3.5.3 Historically, it is only Heathrow that has had an established secondary market for slots but, as Gatwick has become ever more constrained, a secondary market has started to emerge. The first significant 'trade' occurred when Flybe sold most of their Gatwick slot portfolio to easyJet in 2012. 25 slot pairs were exchanged for an average of £0.8m per pair. In the last few years, the values attached to Gatwick slots have increased significantly and, in 2019, slots were valued at around £3m per pair based on a portfolio of slots.

3.5.4 For the recently available Thomas Cook slots at Gatwick, competition increased with interest from EasyJet, Wizz Air, IAG, TUI and other reported bidders.

3.5.5 The graphs below compare recent slot demand against declared slot capacity at Gatwick, Luton and Stansted (Figure 3.1).

Figure 3.1 : Slot Application Summary (Summer 2020)



Source: ACL, S20 Initial Slot Allocation Reports (Demand), 30th Dec retrieved

Note: Green bars represent demand by airlines for slots (by day of the week Mon-Sun) requested at the annual slot conferences. Grey bars show the available capacity in the summer season.

3.5.6 The need for additional capacity is already apparent and the extra capacity overdue. However, the need is forecast to intensify significantly.

3.5.7 The national forecasts published with the Jet Zero Strategy predict a growth of 70% in passenger demand between 2018 pre-pandemic levels and 2050.[24]

3.5.8 Demand forecasts prepared by the Department for Transport (DfT) provide long term forecasts of UK air passenger demand. The DfT's 2017 forecasts predicted continued growth in demand of around 1.8% per annum in the long term (2016-2050) to 356 million by 2030, 421 million by 2040 and 494 million in 2050 in its central case projection[25]. These forecasts have now been updated by the more recent UK Jet Zero forecasts from 2022, published as part of the Government's Jet Zero Strategy. [26]

3.5.9 The Jet Zero forecasts continue to use the same model/approach as the 2017 forecasts but have been updated with more recent market data as well as updated segmentation. They take account of a range of factors, including the likely increase in the impact of carbon values.

3.5.10 The Jet Zero forecasts present a very similar trajectory to the 2017 forecasts. They predict that UK passenger demand will grow at around 1.7% p.a. in the long term (2018-2050). The Jet Zero scenario 1 forecasts ('Continuation of current trends') predict demand of 354 million by 2030, 425 million by 2040 and 493mppa in 2050, whilst its Scenarios 2, 3 and 4 forecasts (embodying different levels of high ambition for reducing emissions) predict very slightly higher demand in the shorter term and slightly lower demand over the medium / long term, with some 355 million passengers by 2030, 422 million by 2040 and 482 million by 2050[27], amounting to a 200 million passengers increase in demand across the UK's airports - approximately a 70% increase by 2050 compared to the 2018 baseline. The chart below (Table 3.1) shows the DfT 2017 forecasts alongside Jet Zero Scenario 1 - 4 forecasts.

Table 3.1 - Comparison of DfT and Jet Zero Forecasts

Source	Period	UK, 2050	CAGR
DfT, 2017	2016-50	494	1.8%
JZ Sc2-4	2018-50	482	1.7%
JZ Sc1	2018-50	493	1.7%

3.5.11 The Jet Zero Strategy explains that the Government is determined to meet the challenge (and the opportunity) posed by the forecasts and is clear that to do so is not incompatible with the

[24] Jet Zero: further technical consultation, March 2022, Department for Transport. Available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1062042/jet-zero-further-technical-consultation.pdf
[25] DfT Forecast Tables 25 & 28 (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/671706/UK-aviation-forecasts-2017-data.xlsx)
[26] Jet Zero: illustrative scenarios and sensitivities, July 2022, Department for Transport. Available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1096929/jet-zero-strategy-analytical-annex.pdf
[27] Jet Zero Dataset https://www.gov.uk/government/publications/jet-zero-modelling-framework

Government's climate change commitments, because a comprehensive set of measures is in place to secure a reduction in aviation's carbon emissions. The scale of the forecasts, however, means that best use must be made of all airport infrastructure, as well as a third runway approved at Heathrow if the demand forecasts are to be met. The Jet Zero Strategy modelling assumes the capacity offered by the Project as well as the Heathrow third runway and making best use of other South-East airport infrastructure.

3.5.12 In its background document 'Jet Zero Modelling Framework' (March 2022), the DfT set out its capacity assumptions for the UK's airports (in Annex D). The capacity assumptions are said to take account of both the third runway at Heathrow and policies to make the best use of other airports (MBU).[28] A summary of the information in Annex D is set out below (Table 3.2):

Table 3.2 – Summary of R3 and MBU capacity: Annual ATM(s) ('000s)

Airport capacities	2019	2030	2040	2050
Gatwick	291	346	383	386
Heathrow	480	505	740	740
Luton	111	151	151	151
Stansted	259	259	259	259
Other	4,054			4,500
Total	5,195			6,035

3.5.13 The table shows the capacity of Gatwick with the NRP, Heathrow with R3, the expanded Luton etc. However, the overall increase in ATM capacity of all of these growth assumptions is an increase in ATM capacity between 2019 and 2050 of just 16%; far less than the forecast increase in demand.

3.5.14 The introduction of the Project would allow both of Gatwick's runways to be used concurrently. This would allow Gatwick to handle additional aircraft movements. The northern runway would be used for departing aircraft (mostly Code C) whilst the main runway would be capable of handling all movements as it is today. This would add significant levels of capacity and accommodate some of the forecast growth in demand for aviation across the wider UK market.

3.5.15 Hourly capacity is assumed to increase from 55 movements in the Baseline Case to 69 movements per hour in peak periods under dual runway operations. This would permit Gatwick to grow both its busy day and year-round air traffic profile significantly.

[28] Jet Zero Modelling Framework, March 2022: Annex B and paragraph 3.8 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1061972/jet-zero-modelling-framework.pdf

3.5.16 With the Project, it is estimated that, by the end of the forecast period in 2047, the number of commercial ATMs could increase to approximately 386,000 compared to 326,000 in the Base case (Table 3.3).

Table 3.3 – Gatwick Commercial Air Traffic Movements and Non-Commercial Air Traffic Movements (thousands, rounded to nearest thousand)

	2019 Actual	2029		2032		2038		2047	
		Base Case	Northern Runway Case	Base Case	Northern Runway Case	Base Case	Northern Runway Case	Base Case	Northern Runway Case
Commercial ATMs	283	311	330	313	378	318	382	326	386
Non-Commercial ATMs	2	2	3	2	3	2	3	2	3
Total Annual Aircraft Movements	285	313	333	316	381	321	385	328	389

3.5.17 Passenger numbers are forecast to increase from 46.6 mppa in 2019 to 80.2 mppa in 2047 with the extra capacity created by the NRP – an increase of 13 mppa compared with the 2047 Base Case (67.2mppa) (Table 3.4):

Table 3.4 - Gatwick Passengers, Market Mix (%)

	2019 Actual	2029		2032		2038		2047	
		Base Case	Northern Runway Case	Base Case	Northern Runway Case	Base Case	Northern Runway Case	Base Case	Northern Runway Case
Domestic	7%	7%	6%	7%	5%	6%	5%	6%	5%
Short Haul	73%	70%	70%	70%	70%	69%	69%	67%	67%
Long Haul	19%	23%	23%	23%	25%	25%	26%	27%	27%
Total (millions)	46.6	57.3	61.3	59.4	72.3	62.4	75.6	67.2	80.2

3.5.18 The **Needs Case** (Doc Ref. 7.2) and the **ES Appendix 4.3.1: Forecast Data Book** (Doc Ref. 5.3) contain sensitivity tests which forecast Gatwick's growth in scenarios of lower growth, the implementation of the third runway at Heathrow and further capacity at Luton. In each scenario, forecast growth for Gatwick still exceeds its capacity.

3.5.19 Whether or not allowance should be made for other airport proposals when considering the need for a particular project was the subject of clear conclusions reached by the SoS in his most recent

decision on airport expansion proposals, at Manston Airport.[29]

> *"97. On the matter of capacity being made available at airports elsewhere, the SoS accepts that there is potential for all existing airports to expand in future to increase capacity. However, the SoS is of the view that in considering whether there is a demand for the capacity the Development aims to provide, he is not able to attach weight to applications that have yet to come forward. This is because there is no certainty that capacity from such applications will be delivered. For example, aspiration plans setting out future growth may be modified or changed, or they may not come forward at all. Where planning permission is required, both the ANPS and the MBU policies are clear that they do not prejudge the decision of the relevant planning authority responsible for decision-making on any planning applications. Such applications are subject to the relevant planning process and may not ultimately be granted consent by the decision-maker. In addition, the aviation sector in the UK is largely privatised and operates in a competitive international market, and the decision to invest in airport expansion is therefore a commercial decision to be taken by the airport operator. This means that while increase in demand (for air freight services) could potentially be met by expansion at other airports, those airport operators may not decide to invest in changes to their infrastructure to meet that demand. It is therefore not possible to say with any certainty whether indicative capacity set out in growth plans will result in actual future capacity."*

> *"102. The SoS notes that the Examining Authority [ER 5.6.45] and the Independent Assessor (IAA section 5.3) consider that there is spare capacity at other airports [ER 5.6.45]. It appears that in concluding this, the Examining Authority and the Independent Assessor are relying in part on aspirational growth plans and the potential for growth at other airports. Such capacity is not required to be taken into account by policy, and it is not in the SoS's view otherwise obviously material to the SoS's decision on this Application for the reasons set out above, principally the lack of any certainty that such potential capacity will ever come forward. To the extent that possible capacity is legally material, the SoS gives no significant weight to it for the same reasons."*

3.6 Cargo

3.6.1 Cargo forecasts have been prepared taking account of the forecast traffic mix. Future growth in cargo tonnage is linked to supply side assumptions around the carrier and market types being served.

3.6.2 In 2019/20 Gatwick airlines carried 150,000 tonnes. Under the Northern Runway scenario, cargo tonnages are forecast to increase to over 200,000 tonnes as the northern runway enters service in 2029. Beyond this, they are forecast to grow steadily to over 320,000 tonnes by 2038 primarily through increased long-haul connectivity offered by the additional runway capacity. By 2047, cargo tonnages are forecast to be approaching 350,000 tonnes per year.

[29] SoS's decision letter at Manston Airport, 18 August, 2022; found here: https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-006369-220818%20-%20Manston%20Airport%20PA08%20Decision%20Letter.pdf

3.7 Resilience and operational benefits

3.7.1 Government policy is clear on the critical importance of ensuring sufficient capacity at airports in order to ensure resilience in airport operations. The ANPS, for example, sets out at paragraphs 2.10 – 2.15 that a lack of capacity can have multiple negative impacts, all of which conflict with the objectives of national policy. Those negative impacts, which are recognised to arise from a lack of capacity, are identified in the ANPS to include:

- an adverse effect on the ability to travel conveniently;
- limits on the range of destinations served;
- negative impacts on the UK through risks of flight delays and unreliability;
- restrictions on the scope for competition and lower fares;
- declining domestic connectivity;
- erosion of the UK's hub status;
- constraining the scope of the aviation sector to deliver wider benefits;
- fares being likely to rise as demand outstrips supply; and
- the lack of available slots making it difficult for new competitors to enter the market.

3.7.2 All of those factors are apparent at Gatwick, which relies on the use of the world's busiest daytime single runway and all of those factors would be addressed at least to some extent by the extra capacity proposed in the NRP.

3.7.3 The consequences of not taking action to address these issues are recognised by the Government as damaging to the UK through a lack of opportunity for global connectivity but also for the impact capacity constraints have on the quality and efficiency of the UK's airports:

> *"Operating existing capacity at its limits means there will be little resilience to unforeseen disruptions, leading to delays. Fares are likely to rise as demand outstrips supply, and the lack of available slots makes it more difficult for new competitors to enter the market."*
>
> "*The Government believes that not increasing capacity will impose costs on passengers and on the wider economy*." [30]

3.7.4 These issues are already apparent at Gatwick, which is the world's busiest daytime single runway airport and which experiences delays and operational constraints on a day-to-day basis, whilst suffering from a lack of resilience to cope with more abnormal events.

3.7.5 Delays and the inability to recover quickly from disruption have disproportionate effects on airlines, passengers and airport staff. A lack of capacity also impacts on the local community as planes run late or adopt holding patterns for longer.

3.7.6 The NRP would bring multiple resilience benefits:

- overall runway capability increased from 55 movements per hour to 69 movements per hour;
- improved capacity and recovery for the critical first wave of daily operations and to recover from backlogs;

[30] Airports NPS paragraph 2.15 - https://www.gov.uk/government/publications/airports-national-policy-statement

- increased capability of the Northern runway in the event of a disruption which causes closure of the main runway;
- reduced utilisation of the main runway, de-stressing the main runway operation;
- improved resilience offered by the proposed Charlie Box hold and reconfigured taxiways; and
- improving the London Airports system resilience.

3.7.7 The Project would increase Gatwick's declared runway capability from 55 to 69 movements per hour. Whist it is acknowledged that over time the demand will increase to fill the additional capability created, the increased capacity will generate the benefit of meeting demand and there will be inherent resilience benefits in having two operational runways, together with enhanced taxiway and holding capacity. The 'spare' capacity in the short to medium term will make it easier to accommodate typical variations that occur during the day, such as being able to more readily accommodate aircraft that are arriving or departing later than scheduled. This contrasts to the current situations where the full utilisation of the runway means it is difficult to accommodate delayed operations without impacting on other aircraft operations.

3.7.8 The northern runway is currently used infrequently in the case of emergency events. One reason for this is because it takes at least 30 minutes to activate the switchover of operations from the main runway to the northern runway and there is a further 15 minute delay after ending use of the northern runway before operations can recommence on the main runway[31]. These necessary time penalties restrict the benefits of bringing into operation the northern runway for anticipated short duration emergencies and undermine the apparent benefit of having a second runway. In 2019 the northern runway was only used once in an unplanned 'emergency' event, and on that occasion for 2 hours. For this reason, the northern runway is most commonly only used whilst planned essential repairs and maintenance work is carried out on the main runway.

3.7.9 The inherent capacity in the current northern runway is therefore largely redundant.

3.7.10 With the Project, should either runway be closed for a short duration the other runway would remain operational, providing increased resilience with continuity of movements and an increase in the percentage of demand which can be processed. The Project would also improve resilience in the event of a long closure of the main runway. In particular, dual runway operations and enhanced capacity of the northern runway and its taxiways together with the fact that it is already operational would offer significant new resilience. Whilst that benefit would reduce over time as demand fills the capacity, the availability of two rather than one operational runway would always offer increased resilience.

3.7.11 The fact that the benefits would reduce over time is a function of the chronic lack of capacity in the South East, not a reason for not consenting additional capacity when it is proposed.

3.7.12 Under current single runway operations, Gatwick's runway is highly utilised throughout the majority of the operational day, for large parts of the year. Under dual runway operations the intensity of use of the main runway will reduce from up to 55 movements per hour to typically up to 48. This results in a reduction in the time the main runway is considered occupied and, as a result, increases the buffer available between movements, increasing the airport's resilience.

[31] The 30 minute delay in switching is based on the time it takes to clear aircraft from the Northern runway protected areas which include centrelines and taxiways. The 15 minute delay in switching back is due to changing systems and runway lighting

3.7.13 The reduced intensity of use of the main runway will reduce the risk of 'Go-arounds', which occur when an arriving aircraft aborts landing during the final stages of approach. One of the most common causes of go arounds occurs when a departing aircraft or preceding arriving aircraft has not fully vacated the runway ahead of the landing aircraft. The number of go-arounds has increased in recent years as the runway has approached full capacity, with obvious environmental and community impacts.

3.7.14 Significant improvements are proposed as part of the NRP in the airport's taxiways and in runway hold capacity, which will greatly enhance the ability to efficiently sequence aircraft departures, adding substantially to the capacity and resilience of the airport.

3.7.15 The Project offers a range of benefits that will improve the resilience of Gatwick and the London system. There are inherent resilience benefits in having two operational runways. Together with enhanced airfield infrastructure, resilience will be improved through reducing delays that occur in the event of adverse conditions or incidents, and by enabling speedier recovery following such events. The 'spare' capacity in the short to medium term will make it easier to accommodate typical variations that occur during the day, minimising and reducing disruption.

3.7.16 GAL has undertaken fast-time AirTOP simulation modelling of the airfield in dual runway operations. This has been used to inform both the layout and configuration of the proposed changes to the airfield which form part of the Northern Runway Project proposals and to test its capacity and performance, to ensure that the airfield can operate efficiently and effectively in processing departing and arriving aircraft. The detailed results are provided as an appendix to the **Needs Case** (Doc Ref. 7.2).

3.7.17 Notwithstanding the growth in flights, average departures taxi times will reduce with the new NRP infrastructure compared to the future baseline (in westerly operations) and compared to 2018 actual performance (easterly operations). These improvements are significant in 2029. The benefits diminish over the period to 2038 as operations on northern runway increase and the airport is successful in accommodating substantial growth.

3.7.18 Arrivals taxi times increase compared to the future baseline in 2029 and 2038 (westerly operations) and compared to 2018 actual performance (easterly operations) but in both cases the differences are marginal.

3.7.19 Airbourne holding time is forecast to reduce in 2029 but, as the northern runway operations increase, the reductions decline and the modelling shows increases in 2038. Airborne holding can be mitigated through air traffic management procedures.

3.7.20 Overall, the simulations demonstrate that there are significant taxi time benefits when operating in westerly direction - the main airport operation mode. These benefits occur every day in typical conditions whilst, when disruption occurs, the resilience benefits of the Project would bring additional benefits, including the ability to more quickly recover from any delay.

3.7.21 The increase in runway slot capacity created through the NRP will offer improved prospects for airlines to receive slot times, as well as to adjust their slot times if required, to fit with demand and to match their slots at the other end of their journey. Currently the low slot availability does not allow for flexibility on adjusting slot times. This extra capacity will give airlines the opportunity to plan their schedules to improve on-time performance, rather than having to plan based on historic and limited slot availability, which can compromise on-time performance.

3.7.22 The importance of ensuring a sufficient supply of slots to meet demand and enable efficient operations is directly recognised by the Government in *Flightpath to the Future*, which sets out that:

> *"…it is critical that the existing capacity of airports is managed as efficiently as possible. Airport slots are used to manage capacity at eight of the busiest airports in the UK. The airport slot allocation system is key to the successful functioning of these airports, as well as the efficiency and competitiveness of the aviation sector as a whole. The current slot allocation system was devised in the early 1990s, at a point at which demand was growing quickly and the amount of available capacity at certain airports was being rapidly filled. Some airports are now effectively full, and therefore newly available slots at some slot-coordinated airports have become a rarity, creating a barrier to competition and new entrants to the market."* (page 26)

3.7.23 This barrier to competition can only be addressed by the release of new capacity.

3.8 Economic benefits

3.8.1 The Project will enable the airport to enhance that economic role, providing more jobs, more economic activity and enhancing international connectivity and trade.

3.8.2 The economic benefits of the Project are set out in **Needs Case Appendix 1: National Economic Impact Assessment** (Doc Ref. 7.2) but a short summary is provided here.

3.8.3 Gatwick Airport already makes a significant contribution to the local and national economies. It provides approximately 24,000 direct jobs, £1.75bn of GVA and just over £1bn in taxes.

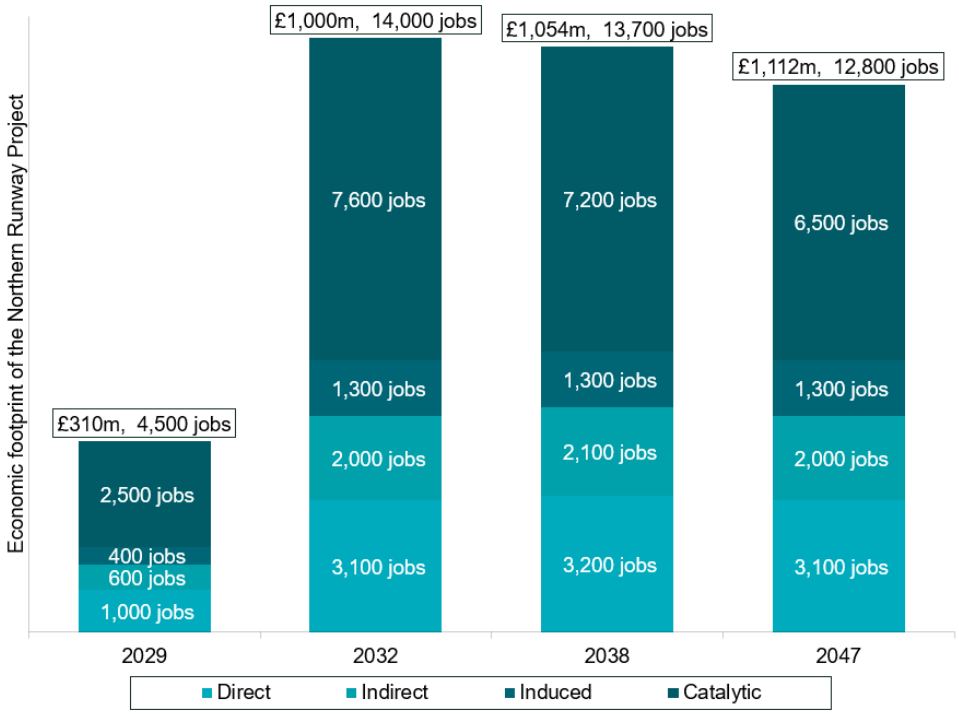
3.8.4 The NRP will further enhance that contribution through both construction and operation.

3.8.5 During construction the workforce will peak at around **1,350 workers**, with over 600 of these expected to be drawn from the Six Authority area (East and West Sussex, Surry, Kent, Croydon and Brighton).

3.8.6 The analysis shows that the Project will increase the scale of the airport's impact in the three study areas around the airport and in the UK as a whole, in terms of both employment and GVA. This impact is a result of direct activity on site associated with servicing additional air traffic, indirect activity in the supply chain, induced activity from individuals employed at Gatwick or in the supply chain spending their wages, and businesses locating or expanding in the local area due to improved connectivity offered by the Project.

3.8.7 Figure 3.2 below shows the economic impact of the Project (in terms of GVA and employment) by type of impact across the assessment period). By the time the runway is fully operational in 2032, it will create a net increase in employment (i.e. after allowing for displacement) of **14,000 jobs** and create an extra **£1bn in GVA** across the Six Authorities area.

Figure 3.2 - Economic Footprint of the Project



3.8.8 Oxford Economics has estimated that it could provide a one-off boost to the capacity of the economy of **0.15% of GDP** (equivalent to approximately £3.3bn in 2019) through the benefits of improved connectivity that support trade and investment.

3.8.9 It will also significantly boost tourism's contribution to **GDP by nearly £2bn** and support a further **26,000 jobs**.

3.8.10 The economic cost-benefit analysis shows that the scheme's benefits significantly outweigh its costs (including environmental and carbon costs) with a **Net Present Value (NPV) of just over £21bn**. In addition, there would be significant non-monetised effects, including employment and trade-related effects set out above.

4 The Northern Runway Project Proposals

4.1 Introduction

4.1.1 This chapter describes the Northern Runway Project and should be read alongside the **Design and Access Statement** (Doc Ref. 7.3), **ES Chapter 5: Project Description** (Doc Ref.5.1) and as shown on the **Works Plans** (Doc Ref. 4.5), **Parameter Plans** (Doc Ref. 4.7) and **Surface Access Highways Plans – General Arrangements** (Doc Ref. 4.8.1) submitted with the DCO application.

4.1.2 Further information about the Project can be found in the appendices to **ES Chapter 5: Project Description** (Doc Ref. 5.3). These are:

- **ES Appendix 5.2.1** Surface Access General Arrangement Plans
- **ES Appendix 5.2.2** Operational Lighting Framework
- **ES Appendix 5.2.3** Mitigation Route Map
- **ES Appendix 5.3.1** Buildability Report – Parts A and B
- **ES Appendix 5.3.2** Code of Construction Practice (including Annexes 1-5)
- **ES Appendix 5.3.3** Indicative Construction Sequencing
- **ES Appendix 5.3.4** Major Accidents and Disasters
- **ES Appendix 5.4.1** Surface Access Commitments
- **ES Appendix 5.4.2** Carbon Action Plan

4.2 Approach to Defining the Proposals

4.2.1 A number of key objectives have underpinned the design approach to the NRP proposals, including to:

- make the best use of the existing runways and infrastructure to meet growing aviation demand, particularly in London and the South East, in accordance with national aviation policy;
- provide better operational performance for passengers and airlines and improve resilience at the airport;
- design infrastructure that is capable of efficiently handling the predicted increase in passenger and aircraft throughputs, maintaining passenger and airline service standards and creating greater choice for airlines and passengers;
- make efficient use of land;
- minimise and mitigate the environmental effects of the proposals, such as on noise, air pollution, carbon and other impacts on the natural environment, and seek opportunities to enhance these aspects where possible;
- phase the development of the project so that disruption to neighbours and passengers is minimised; and
- develop the project largely within the current footprint of the airport and minimise disruption to neighbours.

4.2.2 The proposals in this application have been developed to enable the existing northern runway to be used alongside the existing main runway. Once operational, the Project would generally result in:

- all arriving aircraft using the existing main runway during normal operations;
- shared departures between the existing main runway and the northern runway (with mainly smaller aircraft using the northern runway); and
- controlled dependency between the two runways to enable safe operations, including crossing of the northern runway by arriving aircraft[32].

4.2.3 The northern runway could be used for both arrivals and departures in circumstances when the main runway is closed, for example during periods of maintenance, in line with current practice.

4.2.4 Even without the NRP, Gatwick is forecast to see a growth in ATMs and passenger throughput from 46.6 million passengers per annum in 2019 to approximately 67.2mppa and 326,000 ATMs in 2047.

4.2.5 The NRP will enable passenger throughput to be increased to approximately 80.2 million passengers with some 386,000 ATMs per annum in 2047. This represents an increase in capacity of approximately 13 million passengers per annum compared to the 2038 and 2047 future baseline scenarios.

4.3 Assessing Alternatives for Growth

4.3.1 The Airports National Policy Statement requires the assessment of alternatives (paragraph 4.28), by reference to The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) which require a description of the reasonable alternatives studied by the Applicant, including an explanation of the main reasons for the option that has been chosen following that assessment. **ES Chapter 3: Alternatives Considered** (Doc Ref. 5.1) provides details of the alternatives assessment.

4.3.2 Gatwick developed a two-stage appraisal process to help identify the preferred proposals to support growth at Gatwick. In Stage One, strategic growth options were considered – to be used separately or in combination – and Stage Two looked at the appraisal of key areas of the development. Further information is provided in **ES Chapter 3** (Doc Ref. 5.1).

Growth Options for Gatwick (Stage One)

4.3.3 Prior to the Covid pandemic, Gatwick experienced a sustained period of growth over the previous 10 years. Government policy set out that the increased demand for air travel was to be met through a new runway at Heathrow and by other airports making best use of their existing runways, subject to the environmental effects being effectively managed. In light of this, GAL developed three scenarios for growth which were the subject of consultation in 2018 in the draft Gatwick Master Plan:

- **Scenario One**: Gatwick remains a single-runway operation using the existing main runway. This scenario would use technology to increase the capacity of the main runway, leading to incremental growth through more efficient operations;
- **Scenario Two**: the existing northern runway is routinely used together with the main runway; and

[32] Controlled dependency: to ensure the safety of aircraft operations, an arrival from the main runway would slow or stop short of the northern runway and cross it only after a departure on the northern runway has completed.

- **Scenario Three**: Gatwick continues to safeguard land for an additional runway to the south.

4.3.4 Over 5,000 consultation responses were received on the draft Master Plan including detailed comments relating to the three growth scenarios presented within the plan.

4.3.5 GAL carefully considered both the consultation feedback and current and emerging national aviation policies and published its final Master Plan in July 2019[33].

4.3.6 Of the three scenarios, GAL concluded that Scenario One would restrict the airport's operations, future growth and Gatwick's ability to contribute to meeting future demand for increased aviation capacity in the South East of England. It would also not make best use of its existing runways, as only one runway would be operational at any time. Scenario One (including the future baseline commitments), when compared to Scenario Two, , would involve effects (either adverse or beneficial) of a smaller magnitude, as demonstrated by the judgments on impacts resulting from the Project in the different topic chapters.

4.3.7 GAL is not actively pursuing Scenario Three in light of the Government's support for the third runway at Heathrow, but consider that it is in the national interest for the land to continue to be safeguarded to allow for a new runway to be constructed to the south of the airport, should future Government policy support this. Scenario Three is likely to have the largest environmental impact of the three options on account of greater passenger numbers requiring additional airport infrastructure.

4.3.8 GAL progressed with Scenario Two – bringing the existing northern runway into routine use – as there are significant operational, economic, social and environmental advantages and benefits to this approach.

4.3.9 After publishing the decision on the final Master Plan, GAL began work to evaluate the technical requirements of its proposals using an appraisal process (called Stage Two).

Identifying Component Parts of The Preferred Proposals (Stage Two)

4.3.10 An options appraisal for the design and layout of the Project components has been undertaken to consider the feasibility and potential impacts of each of the component parts. Further information is provided in **Section 3.5** in **ES Chapter 3** (Doc Ref. 5.1)**.** The process assessed each option for suitability, operational viability, cost and environmental effects. The following criteria have been used to identify appropriate options to be considered in the appraisal:

- each option must be an option that is genuinely possible to deliver (ie they must be a reasonable alternative);
- each option must be identified bearing in mind potential implications for other Project components; and
- each option must be identified bearing in mind potential implications for the remainder of the airport that is not proposed to be affected by the Project.

4.3.11 Using these criteria, a number of design and layout options were identified. Following the identification of the emerging preferred options for each of the components, further analysis was

[33] [redacted]

undertaken of how each option would work together and create a coherent set of proposals. For each category a scoring system was used to qualitatively assess design and/or layout options using knowledge of the site and the surrounding area. The scoring system allowed there to be a consistent approach taken to each category. The full appraisal, based on a five-scale red, amber, green (RAG) approach is set out in **ES Appendix 3.5.1: Options Appraisal Tables** (Doc Ref. 5.3).

4.3.12 Further details on the highway improvements options, specifically related to the North Terminal Roundabout is provided within **ES Appendix 3.5.2: North Terminal Roundabout Options Development** (Doc Ref 5.3). The assessment methodology for highways is in accordance with Transport Analysis Guidance (TAG) guidance and has been developed in consultation with National Highways and local highway authorities (Department for Transport, 2022).

4.3.13 After the appraisal process, the options identified as performing best against the criteria were taken forward to form part of the current design for the proposals.

4.3.14 A review of design and layout options was then undertaken through an iterative design process. This review has taken into account the following criteria:

- operational;
- business case;
- deliverability;
- planning;
- surface access;
- water;
- environment (ecology, heritage, soils, visual);
- community (noise, air quality, health, socio-economic); and
- land and property.

4.3.15 The proposals have been developed and refined in the light of the feedback received during the consultation events and from on-going environmental assessment studies.

4.4 DCO Works Numbers

4.4.1 Schedule 1 of the **draft DCO** (Doc Ref. 3.1) provides a description of works for which development consent is sought (referred to as the 'authorised development').

4.4.2 Each of the main components of the authorised development is attributed a work number ('Work No.'). The work numbers should be read alongside the **Work Plans** (Doc Ref. 2.3) which define the location of the authorised development and the **Parameter Plans** (Doc Ref. 4.7) which define any limits of deviation.

4.4.3 The maximum extent and area of each Work No. are shown on the **Work Plans** and **Parameter Plans**; with the approximate level of the finished works, the height of the structure (m) and/or maximum parameter height within which this Work would be undertaken described in the corresponding text in this chapter. The maximum extents for each Work No. are governed by Article 6 (Limits of deviation) of the **draft DCO**.

4.4.4 The main components of the Project and corresponding works numbers are set out in Table 4.1.

Table 4.1: Project Works Numbers

Main Component	Work No.
Repositioning of the northern runway	Work No. 1
Access track between the northern runway and the main runway	Work No. 2
Conversion of existing stands to remote stands and taxiways west of Pier 3	Work No. 3
Works to reconfigure taxiways	Work Nos. 4
Reconfiguration of the Aircraft Holding Area (Charlie Box) and Oscar Area and construction of Pier 7	Work No. 5, 6 and 7
Removal of airside[34] support facilities	Work No. 8
Replacement and construction of airside support facilities	Work No. 9, 10, 11, 12, 13, 14, 15, 16, 17, 18 and 19
Larkins Road	Work No. 20
Terminal Works	Work No. 22, 23, 24 and 25
Hotels, Office Space and Car Parks	Work No. 26, 27, 28, 29, 30, 31, 32, 33 and 34
Highway Works	Work No. 35, 36 and 37
Miscellaneous including Environmental Mitigation and Open Space	Work No. 38, 39, 40, 41 42 and 43

4.4.5 Schedule 1 of the **draft DCO** also includes a provision which sets out a number of minor works that are common to a number of work packages, under the heading "Other Associated Development". These include works such as landscaping and drainage, establishment of construction compounds, vegetation clearance, works to trees, shrubs and hedges and utilities installation.

4.5 The Project

4.5.1 The Project proposes alterations to the existing northern runway which, along with lifting the current restrictions on its use, would enable dual runway operations. Together with the alterations to the northern runway, the Project would include the development of a range of infrastructure facilities to allow increased airport passenger numbers and aircraft operations.

4.5.2 The Project includes alterations to the existing northern runway and corresponding enhancements to the taxiway system and parking stands to accommodate an increase in aircraft

[34] The airport is divided in two areas - landside and airside. Airside – the area within the Airport Boundary that is beyond passport and customs control, and involves the arrival and departure of an aircraft. For example, this includes the airfield, runways, taxiways and hangers. Landside – the area that is outside the Airside (ie outside passport and customs control) but within the Airport Boundary. For example, this includes car parking areas, hotels, offices and terminal buildings.

movements. Other elements of the Project would enable the increased airfield capacity to be accessed by passengers through additional processing capability and improved airport access. Land is proposed to mitigate environmental effects (for example, for habitat creation, flood compensation or provision of recreational routes and public open space).

4.5.3 As an overview, the Project includes amendments to the existing northern runway including::

- repositioning its centreline 12 metres further north to enable dual runway operations;
- reconfiguration of taxiways;
- pier and stand alterations (including a new pier);
- reconfiguration of specific airfield facilities;
- extensions to the existing airport terminals (north and south);
- provision of additional hotel and office space;
- provision of reconfigured car parking, including new car parks;
- surface access (including highway) improvements;
- demolition and relocation of Central Area Recycling Enclosure (CARE) facility;
- reconfiguration of existing utilities, including surface water, foul drainage and power; and
- landscape/ecological planting and environmental mitigation.

4.5.4 The land subject to the application for development consent extends to approximately 735 hectares. Following the consultations in 2021 and 2022, this area has been reduced in size from approximately 820 hectares (in the 2021 consultation) as some areas are no longer considered required for the Project. Further detail about changes to the Project that have been made following consultation and engagement with the public and stakeholders is set out within the technical chapters and the **Consultation Report** (Doc Ref. 6.1).

4.5.5 The Project site boundary is shown on **ES Figure 5.2.1: ES Project Description Figures** (Doc Ref. 5.2). Key components of the Project are shown on **ES Figure 5.2.1: ES Project Description Figures (sheets a – h)** (Doc Ref. 5.2). Details of the proposed highway improvements are provided in the plans in **ES Appendix 5.2.1 Surface Access General Arrangement Plans** (Doc Ref. 5.3).

4.5.6 The principal components of the Project are described below.In this chapter, all references to ES Figures can be found in **ES Project Description Figures** (Doc Ref. 5.2).

Changes to Enable Dual Runway Operations

4.5.7 The proposals in this application have been developed to enable the existing northern runway to be used alongside the existing main runway. Once operational, the Project would generally result in:

- all arriving aircraft using the existing main runway during normal operations;
- shared departures between the existing main runway and the northern runway (with mainly smaller aircraft using the northern runway); and

- controlled dependency between the two runways to enable safe operations, including crossing of the northern runway by arriving aircraft[35].

4.5.8 The northern runway could be used for both arrivals and departures in circumstances when the main runway is closed, for example during periods of maintenance, in line with current practice.

4.5.9 Because of the minimum 210m separation distance between the centrelines of the two runways, they would be treated for the purposes of air traffic control as a single runway for departure-departure separation purposes.

4.5.10 Departing aircraft would be cleared for take-off only after an arrival has touched down on the main runway or whilst an arrival is at least two nautical miles from the runway. Aircraft taking off from the northern runway would be mainly Code C (typically Airbus 320 and Boeing 737 aircraft) while the main runway would continue to be used for arrivals and departures for aircraft of all sizes.

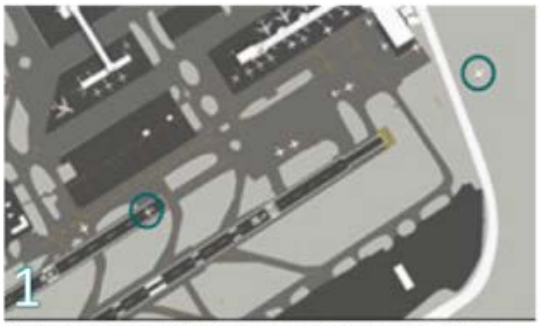
4.5.11 Arriving aircraft would continue to use the current approach to the main runway but would need to cross the northern runway (or its protected areas) after landing to reach the airport's terminals. If the flow of aircraft does not allow for the arriving flight to cross immediately, and the aircraft is a Code C size or smaller, it would hold in a safe location on the exit taxiways that are proposed between the two runways. If the northern runway is not clear to cross, larger aircraft will use the end-around-taxiways (EATs) to reach the terminal.

4.5.12 The anticipation is that an enhanced instrument landing system (EILS) would replace the current instrument landing system (ILS) transmitters. With all arrivals continuing to use the main runway, the proposals assume that arrival-arrival separation rules will not change.

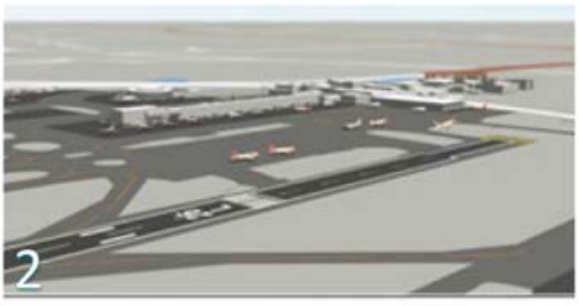
4.5.13 There is a restrictive requirement within the **draft DCO** (Doc Ref. 2.1) whereby, from the date of dual runway operations, the airport may not be used for more than 386,000 ATMs per annum.

4.5.14 The take-off and landing process for operating both runways together are illustrated in Figure 4.1.

Figure 4.1: Dual Runway Operations at Gatwick Airport



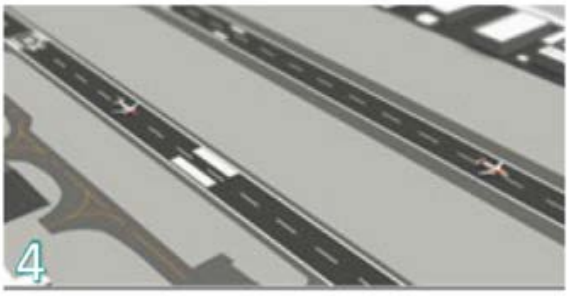
As an aircraft is on short finals for the southern runway, and aircraft is given a line-up and wait clearance on the northern runway.



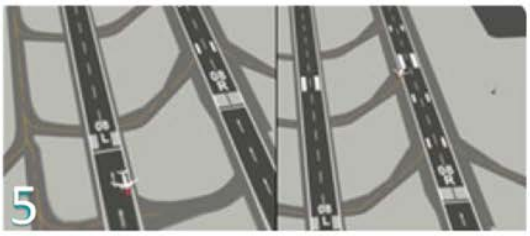
The aircraft on approach is given a landing clearance for the southern runway and a hold short instruction for the northern runway.

[35] Controlled dependency: to ensure the safety of aircraft operations, an arrival from the main runway would slow or stop short of the northern runway and cross it only after a departure on the northern runway has completed.

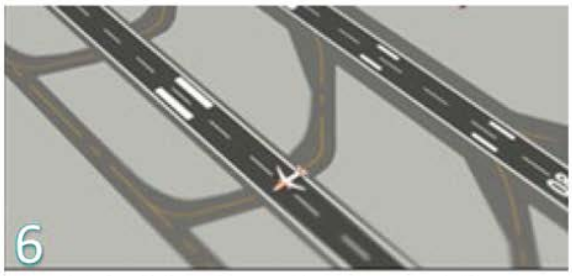
As the aircraft approaching the southern runway touches down, the second aircraft on the northern runway is given take-off clearance.



The departing aircraft on the northern runway starts its take-off roll whilst the arriving aircraft on the southern runway decelerates.



The departure on the northern runway lifts-off and starts to climb away and the arrival aircraft vacates the southern runway using one of the exit taxiways.



The arrival aircraft is instructed to cross the northern runway behind the departure aircraft that has climbed away.

Alterations to the Existing Northern Runway

4.5.15 The existing northern runway is designated 08L/26R such that when the wind is from the east, aircraft approaching the runway operate on a heading of 80°, while when the wind is from the west, aircraft operate on a heading of 260° (see **ES Chapter 4: Existing Site and Operation** (Doc Ref. 5.1) for further details). The runway is currently and will remain a non-instrument runway[36], measuring approximately 2.6km in length and 45 metres in width, plus runway shoulders.

4.5.16 The existing northern runway would be adjusted to reposition the centreline 12 metres further north to ensure a separation distance of 210 metres between it and the main runway. This distance is required to meet European Aviation Safety Agency standards for closely spaced parallel runways. The repositioned northern runway would retain a width of approximately 45 metres, with 7.5 metre wide shoulders. The location of the adjusted northern runway is shown on **ES Figure 5.2.1a** (Doc Ref. 5.2).

4.5.17 The redundant 12 metre strip of hardstanding to the south of the repositioned northern runway would be removed and returned to grass. The 33 metre wide section of retained existing runway, together with the new 12 metre strip to the north, would be resurfaced and provided with new markings to form the repositioned northern runway. There would be no change to the overall

[36] A non-instrument runway is one where the pilot is reliant on visual cues (approach and runway lighting, approach path indicators, and paint markings) to make a safe approach and landing to the airport. If the visual cues are not visible to the pilot owing, for example, to fog on the runway or a very low cloud base, then the aircraft may have to hold until conditions improve, or divert to an alternate airport. A non-instrument runway is not equipped with an Instrument Landing System, but can still be used for low-visibility departures.

length of the runway.

Reconfiguration of Taxiways

4.5.18 A number of existing taxiways would require amendment and realignment to accommodate the adjustment to the northern runway, to provide sufficient room for the safe manoeuvring of aircraft associated with both runways and to accommodate increased aircraft numbers. Redundant areas of hardstanding would be removed. All works required on taxiways are shown on **ES Figure 5.2.1a** (Doc Ref. 5.2).

Taxiway Juliet

4.5.19 The existing Taxiway Juliet would require an increased separation distance from the northern runway to allow aircraft to use this taxiway independently of the northern runway operations. The western part of Taxiway Juliet (Taxiway Juliet West) would be realigned approximately 27 metres to the north of its existing position to allow for the movement of large (Code F) aircraft[37].

4.5.20 The eastern part of Taxiway Juliet (Taxiway Juliet East Code E) would be repositioned approximately 19.5 metres to the north between Taxiways Uniform and Sierra. This would allow for the movement of Code E aircraft along this section of taxiway independently of northern runway operations.

4.5.21 The eastern part of Taxiway Juliet between Taxiways Sierra and Quebec (Taxiway Juliet East Code C) would be realigned by approximately 14.5 metres northwards and widened by 8 metres to allow for the movement of Code E aircraft independently of northern runway operations.

4.5.22 In addition, a new spur (known as the Taxiway Juliet West Spur) would be provided to the north of the taxiway to provide a passing lane for taxiing aircraft and to allow air traffic control to effectively sequence aircraft for departure on the main and northern runways during easterly operations.

Taxiways Lima and Tango

4.5.23 Modifications to the existing Taxiways Lima and Tango are proposed to create independence in routing to and from the northern runway for large aircraft, while avoiding the need to move Taxiway Juliet 27 metres further north along its entire length.

4.5.24 Taxiway Lima would require an extension westward, towards the existing Taxiway Uniform, providing a route suitable for larger Code E and Code F aircraft. The extension would be 23 metres in width and approximately 300 metres in length. This would require some work to the pavement (hardstanding) of the existing Taxiway Uniform as well as changes to stands.

4.5.25 A northern extension to Taxiway Tango is proposed to provide a cut-through to meet the extended Taxiway Lima, creating a taxiway for Code E aircraft. The cut-through would be 23 metres in width and approximately 85 metres in length.

4.5.26 The amended Taxiways Lima and Tango are shown on **ES Figure 5.2.1a** (Doc Ref. 5.2).

[37] Details of aircraft categories are provided in ES Chapter 4: Existing Site and Operation (Doc Ref. 5.1)

Taxiways Whiskey, Victor and Zulu

4.5.27 Taxiways Whiskey, Victor and Zulu would be upgraded to accommodate Code E aircraft. This would involve new pavements and would largely be located within the area occupied by the existing taxiways but would require an additional area to the north of Taxiway Zulu to accommodate wider body aircraft. The amended taxiways are shown on **ES Figure 5.2.1a** (Doc Ref. 5.2).

Exit/Entrance Taxiways

4.5.28 Works to reposition and upgrade nine runway exits/entrance taxiway connections between the northern runway and Taxiway Juliet are proposed to allow aircraft to move from the main and northern runways to Taxiway Juliet and to access the northern runway for departure. They would each have a footprint of approximately 2,000m^2. Two existing exit/entrance taxiway connections would be removed and one would be substantially modified.

4.5.29 Works to reposition and upgrade six exit/entrance taxiways to/from the main runway are proposed to allow aircraft to access and egress the runway, and to allow aircraft to be held before crossing the northern runway, under the direction of air traffic control. Each would have a footprint of approximately 5,000m^2.

4.5.30 For the first exit between the northern runway and the main runway in either runway direction the actual footprint would be located within 100 metres either side of the indicative position shown on **ES Figure 5.2.1a** (Doc Ref. 5.2). The limits of these development envelopes are shown as a dashed green line. This is required to enable the precise location to reflect the relevant regulations and requirements at the time. This approach also applies to the associated northern runway to taxiway Juliet connections.

4.5.31 Once amended, seven exit/entrance taxiways would connect the main and northern runways (five would operate when the runway operates as 26R and two would operate when the runway operates as 08L) while an eighth taxiway would provide an exit from the main runway to the western end-around taxiway, described below.

4.5.32 On **ES Figure 5.2.1a** (Doc Ref. 5.2) the modified entrance/exit taxiway is shown in hatched green, unaffected entrance/exit taxiways are shown in dark grey and relocated entrance/exit taxiways are shown in light green.

End Around Taxiways

4.5.33 Amendments are required to existing infrastructure to provide end around taxiways (at each end of both runways) to allow large aircraft to exit and cross beyond the end of the runway, under the direction of air traffic control. In addition, they would provide an alternative route for all aircraft to leave the runway in case of any issue preventing the use of exit taxiways.

4.5.34 These proposed end around taxiways would comprise the following which are shown on **ES Figure 5.2.1a** (Doc Ref. 5.2).

- **end around taxiway west:** a new end around taxiway linking into the existing Taxiway Juliet to allow aircraft landing on the main runway to avoid affecting northern runway operations when aircraft are operating on a heading of 260° (footprint of approximately 30,000m^2); and

- **end around taxiway east (Yankee):** a new exit taxiway would link into the existing Taxiway Yankee to form the end around taxiway east (Yankee) (footprint of approximately 35,000m^2). This would allow aircraft landing on the main runway to avoid affecting northern runway operations when aircraft are operating on a heading of 80°.

Aircraft Holding Area

4.5.35 Reconfiguration of an existing apron area to the north of Taxiway Juliet (currently referred to as the "Aircraft Holding Area") is proposed. This would include reconfiguration of the existing stands (known as the 130s/140s stands), removal of the Airside Operations Building and pumping station 17 and relocation of de-icer storage tanks and substations BP and BR. This new configuration is known as the "Charlie Box" and would provide aircraft stands and operational aircraft hold points which allow aircraft to be held just prior to accessing the northern runway to optimise runway occupancy efficiency and remove aircraft from busy taxiways. The Charlie Box would include new taxiways across the existing apron area, including:

- four routes for Code E aircraft linking Taxiway Kilo and the northern runway;
- an east-west taxi route for Code C aircraft to allow independent access/egress from all positions; and
- two routes for Code C aircraft with a Code F taxi lane on Taxiway Kilo to link with taxiways Papa and Quebec and provide alternative routing for Code F aircraft to the runway.

4.5.36 The aircraft holding area/Charlie Box would occupy an area of approximately 15 hectares and is shown in on **ES Figure 5.2.1a** (Doc Ref. 5.2).

Pier and Stand Amendments

4.5.37 GAL currently operates six piers (Piers 1, 2 and 3 at the South Terminal and Piers 4, 5 and 6 at the North Terminal). A western extension to Pier 6 has been permitted separately to the Project and is included as part of the future baseline for the Project. Construction on the extension started in 2019 and work was paused in 2020 due to the COVID-19 pandemic and is expected to resume in 2024 and be complete by 2026 (see **ES Figure 5.2.1a** (Doc Ref. 5.2)).

4.5.38 As part of the Project, a new Pier 7 is proposed to the north west of Pier 6. The proposed Pier 7 building is shown on **ES Figure 5.2.1a** (Doc Ref. 5.2) and would consist of three floors, including an autonomous vehicle station (at ground level), together with limited commercial facilities at the first-floor level. It is proposed that passengers would access the new pier via autonomous vehicles from new stations provided at the North and South Terminal buildings. The pier would occupy an area of approximately 10.1 hectares (101,000m^2), with a maximum building height of up to 18 metres. The apron to the south of Pier 7 would provide new aircraft stands (14 Code C/9 Code E).

4.5.39 In addition to the new Pier 7, the following amendments to stands are proposed to allow for increased flexibility in terms of handling of different aircraft types (areas for the proposed new stands are labelled on **ES Figure 5.2.1a** (Doc Ref.5.2)):

- provision of a new area comprising eight remote stands in the existing area to the north of Taxiway Juliet (in an area to be known as Oscar);

- reconfiguration of existing areas of remote stands to allow for the reconfigured Taxiway Lima while retaining stands suitable for Code C aircraft (stands 150-151) and removal of stand 152;
- provision of additional intermediate hold stands (particularly within the proposed aircraft holding area/Charlie Box);
- conversion of existing stands located to the west of Pier 3 to Code C fully serviced stands – providing overnight aircraft parking/remote stands;
- provision of one new Code C stand north east of the existing hangar 7;
- removal and reduction of existing stands to allow for relocation of Taxiway Juliet East; and
- provision of up to 14 new stands north of Taxiway Lima.

Reconfiguration of Existing Airport Facilities

4.5.40 The following existing facilities would require reconfiguration or relocation and additional facilities would be required to accommodate the proposed changes to the airport:

- central airfield recycling enclosure (CARE) facilities;
- motor transport facilities;
- grounds maintenance facilities;
- airfield surface transport facilities;
- emergency air traffic control tower and rendezvous point north and TCR Snowbase Building;
- cargo facilities;
- provision for aircraft engine ground running;
- fire training ground and satellite airport fire service provision;
- hangars;
- provision of perimeter boundary treatments to mitigate noise (e.g. noise walls and bunding); and
- internal access routes.

4.5.41 These are described further in turn below.

Central Area Recycling Enclosure (CARE) Facilities

4.5.42 Operational waste from Gatwick (both airside and landside) is currently taken to the existing CARE facility which comprises a food waste to energy plant that produces heat and is located within an area of the existing airfield to the north of Taxiway Juliet. Facilities include the existing waste processing building (including a biomass boiler), compound area extending to 2,600m^2, materials recovery facility (MRF) and bin store covering a further 2,500m^2. This area would be repurposed to provide new remote stands and therefore the existing CARE facility (shown in **ES Figure 5.2.1h** (Doc Ref. 5.2)) is proposed to be demolished and re-provided.

4.5.43 The proposed replacement CARE facility would be located to the north-west of Pier 7 (shown in **ES Figure 5.2.1a** (Doc Ref. 5.2)). The facility would process the majority of airport waste with the exception of food waste from international flights (also known as international catering waste (ICW)) which is a high risk category 1 waste). The existing CARE facility would remain in operation until the new CARE facility had been commissioned. It would process food waste for energy (heat), as does the current facility, although to provide for growth associated with the Project it would need to process a larger volume of food waste and would therefore be larger in scale. There would be two biomass boilers (one pre-existing to provide for the relocated 650 kw

plus an additional 450 kw to provide for growth). There would be a MRF to allow sorting of waste. A storage area would be provided for baled waste for collection by external suppliers from both landside and airside operations. The building would occupy an area of approximately 17,550m^2. The main building would be up to 22 metres in height with a biomass boiler flue that would be up to 48 metres above ground level (diameter of 0.47 metres) and there would be elements up to 5 metres below ground level.

4.5.44 In addition to the above, the CARE facility would include:

- card baling facilities,
- vehicle weigh in/weigh out platform (a weighbridge);
- office accommodation and welfare facilities; and
- hard standing area for recycling storage, quarantine area and manoeuvring area for supplier collection vehicles and vehicle movements.

4.5.45 The proposed replacement CARE facility offers the opportunity to manage greater quantities of waste by providing a larger area for vehicle management, material sorting and holding areas for bulked up waste. It also safeguards space for recycling of other types of waste from the airport in the future.

Motor Transport Facilities

4.5.46 The motor transport facilities comprise a range of facilities to maintain a fleet of approximately 300 operational vehicles including snow clearing vehicles, fire tenders, buses, cars and vans. These include; parts and tyre storage, workshops, lamp and brake test facilities, vehicle washing facilities, vehicle refuelling facilities, office and staff welfare accommodation. The existing motor transport facilities are located to the north of Taxiway Juliet (shown in **ES Figure 5.2.1h** Doc Ref. 5.2)) and are proposed to be demolished and re-provided in the north-western part of the airport (shown in **ES Figure 5.2.1a** (Doc Ref. 5.2)).

4.5.47 The proposed replacement motor transport facilities would include car parking, a parts store, ramps, pits, tyre store, test area, workshop, heavy goods vehicle (HGV) refuelling area, vehicle wash area, offices and staff welfare. There would also be provision of electric charging and hydrogen vehicle fuelling capability. The building(s) and compound would occupy an area of approximately 15,600m^2, with a maximum building height of 15 metres above ground level and could include elements up to 5 metres below ground level.

Grounds Maintenance Facilities

4.5.48 The grounds maintenance facilities support the maintenance of Gatwick's grounds and green spaces including a shed for tool storage, secure storage of pesticides and other hazardous substances (as required by The Control of Substances Hazardous to Health Regulations 2002), a small cabin for office/staff welfare, an open vehicle/equipment storage shed as well as parking facilities and a green compost area.

4.5.49 The existing grounds maintenance facilities would be demolished (shown in **ES Figure 5.2.1h** (Doc Ref. 5.2)) and re-provided in an area of hardstanding in the south eastern part of the airport (shown on **ES Figure 5.2.1a** (Doc Ref. 5.2)). New buildings would include an open vehicle storage shed, closed tool shed, hazardous substances unit and a portacabin style office/welfare area. A yard would be required with sufficient space to park and turn vehicles, together with a

green waste composting area. The building would be approximately 1,230m^2 in area with a maximum height of 8 metres.

Airfield Surface Transport Facility

4.5.50 The airfield surface transport facility is primarily a storage shed for grit/salt used to keep landside roads and car parks safe in icy conditions. The existing surface transport facility (shown in **ES Figure 5.2.1h** (Doc Ref. 5.2)) would be demolished and re-provided in an area of hardstanding in the south-eastern part of the airport, adjacent to the grounds maintenance facilities. New buildings would include open storage and vehicle sheds and a grit and salt store, together with a parking area. This would be located within an area of approximately 1,440m^2 with a maximum building height of 15 metres (shown in **ES Figure 5.2.1a** (Doc Ref. 5.2)).

4.5.51 An autonomous vehicle maintenance building would be constructed near to Pier 5. It would have a footprint of approximately 527m^2 with a height of approximately 12 metres (as shown on **ES Figure 5.2.1a** (Doc Ref. 5.2)).

Emergency Air Traffic Control Tower and Rendezvous Point North

4.5.52 The emergency control tower (sometime referred to as the “standby control tower”) was Gatwick's control tower from 1958 until 1984 when it was replaced by the current 'stalk mounted' tower. The building continues to operate as a 'standby' tower if for any reason the main tower is inoperable (for example during maintenance activities). The building also houses multiple IT equipment rooms, training facilities, office and staff welfare accommodation. The emergency air traffic control tower is located south of the existing Hangar 7 and to the west of the surface transport and grounds maintenance facility as shown in **ES Figure 5.2.1h** (Doc Ref. 5.2).. This tower could initially retain its current function but be converted from a landside to an airside location with a new bus stop and walking route for staff access. In the longer term, it would be demolished to make way for an additional stand.

4.5.53 As part of Gatwick's Aerodrome Emergency Plan, Rendezvous Points have been established to which oncoming vehicles from external responders (Police, Fire, Ambulance, AAIB, etc.) report, in the event of an emergency. From the Rendezvous Points, responders are escorted to the accident/incident site with the minimum of delay. Rendezvous Point North is a secure area of approximately 4,500m^2 hardstanding for vehicles, with a small cabin with power and utilities and an airside gate for easy access to the airfield as shown on **ES Figure 5.2.1h** (Doc Ref. 5.2). Due to the proposed reconfiguration of this area, the existing Rendezvous Point North would be relocated in order to re-provide a suitable emergency rendezvous area, to the north of the central airport area, for off-airport emergency services. The relocated Rendezvous Point North is shown on **ES Figure 5.2.1a** (Doc Ref. 5.2). It would require an area of approximately 4,490m^2 with a maximum building height of 5 metres.

4.5.54 The former TCR Snowbase building is currently disused, having formerly been used for equipment storage and maintenance, (the location is shown on **ES Figure 5.2.1h** (Doc Ref. 5.2)) and would be demolished.

Cargo Facility

4.5.55 The cargo facility is owned and operated by Segro and handles freight passing through the

airport. Gatwick has almost no freight only flights, but all wide-bodied, long-haul aircraft carry freight in their holds, as well as passengers' baggage. The existing cargo facility occupies an area of approximately 10 hectares, including 23,000m^2 of cargo sheds, with office accommodation and areas for HGV loading, unloading, and parking. It currently includes non-cargo activities and is not therefore currently used to its full potential.

4.5.56 The cargo facility has capacity to accommodate the existing throughput and the increased cargo throughput that the Project is forecast to generate; some internal operational changes within the facility are proposed.

Aircraft Engine Ground Running

4.5.57 Engine ground running is the operation of one or more of the engines of an aircraft on the ground to functionally check the operation of the engine or the aircraft systems. If an aircraft requires an engine test, it will be directed by air traffic control to one of several designated sites depending on wind direction and airport operations. Aircraft engine ground running is currently facilitated in a number of locations on existing taxiway infrastructure some of which would be affected by the reconfigured airfield facilities forming part of the Project. Amended locations for engine ground running are proposed on Taxiway Juliet close to the current areas and Taxiway Yankee (see **ES Figure 5.2.1a** (Doc Ref. 5.2)).

Fire Training Ground

4.5.58 The Project requires the relocation of the existing fire training ground in order to allow for the reconfigured Taxiway Juliet (and spur). The fire training ground currently occupies an area of approximately 13,050m^2 in the western part of the airfield, to the north of the existing northern runway, and includes a fire training rig, control centre, compartment fire training complex, road traffic collision mock-up area, classrooms, underground water storage, water tower and deluge system. The facility allows for rescue and firefighting training to ensure maintenance of competency and skills for GAL's own rescue and firefighting service.

4.5.59 It is proposed that the existing fire training ground be demolished (see **ES Figure 5.2.1h** Doc Ref. 5.2)) and re-provided to the north of its existing location (shown on **Figure 5.2.1a**), occupying a consolidated area of approximately 12,000m^2. The existing rig would be relocated, the height of which would be up to 25 metres, with tank depths of up to 5 metres below ground.

Satellite Airport Fire Service Provision

4.5.60 A Satellite Airport Fire Service facility would be located to the south of the main runway to meet aerodrome certification requirements, including response time to incidents. The facility would be located within an area of up to 8,000m^2, with a maximum built height of 15 metres. The location is shown on **ES Figure 5.2.1a** (Doc Ref. 5.2).

Hangars

4.5.61 A hangar has recently been constructed by Boeing in the north west part of the airport (completed in autumn 2019). One additional hangar, sized for Code E aircraft, would be required as part of the Project. This is also proposed to be located in the north western part of the airport, to the north of Larkins Road and Taxiway Uniform. The hangar would have a footprint of approximately

12,440m^2 and would be up to 32 metres high and could extend below ground level by up to 10 metres. The proposed hangar would be located within the area shown on **ES Figure 5.2.1a** (Doc Ref. 5.2) together with a bus stop and staff car parking (approximately 100 spaces) and service yard car park.

4.5.62 In addition, the existing Hangar 7 (previously operated by Virgin) in the north-west part of the airport would be converted to an airside operation. It is proposed that some ancillary infrastructure on the north side of the hangar would move slightly southwards in order to accommodate the extension of Lima Taxiway. The infrastructure would be up to 5 metres in height and could involve a depth of up to 5 metres below ground level and would require an area of 1,520m^2. The proposed location of the relocated infrastructure is shown on **ES Figure 5.2.1a** (Doc Ref. 5.2). Like-for-like facilities would be provided to the south of the hangar. In addition, an airside bus stop location and pavement would be re-provided for staff access.

Perimeter Boundary Treatments to Mitigate Noise

4.5.63 The Project would remove an existing bund in the western end of the airfield which attenuates noise to external areas from taxiing aircraft. The existing bund at the western end of the runway is approximately 25 metres in width, 255 metres in length and up to 12 metres in height. The functionality of the bund would be re-provided by a new bund and wall as shown on **ES Figure 5.2.1g** (Doc Ref. 5.2). The proposed wall would be approximately 450 metres in length. The western section of the noise bund and wall would be up to 8 metres high. The eastern section of the wall (beyond the bund) would be up to 10 metres high. It would be up to 30 metres in width. The approach to the construction of the new bund and wall would take into account the need to continue to mitigate noise to noise sensitive receptors to the west by retaining sections of the existing bund during the works, working from east to west.

Internal Access Routes

4.5.64 The existing Larkins Road within the airport boundary would require realignment to accommodate the extension to Taxiway Lima. The realigned route (shown on **ES Figure 5.2.1d** (Doc Ref. 5.2)) allows for a 9.3-metre-wide road with 5 metres buffer on either side (except for the area south of Pond M between Brockley Wood and Hangar 11) and would remain within the existing airport boundary.

4.5.65 An airside route for autonomous vehicles would be provided to allow travel between the new Pier 7 and the terminal buildings. This is anticipated to use existing infrastructure and the route is shown on **ES Figure 5.2.1d** (Doc Ref. 5.2).A new east-west grasscrete access track is proposed between the main runway and the altered northern runway, suitable for use by light vehicles in order to allow aerodrome inspections and for other management/maintenance purposes (shown in **ES Figure 5.2.1a** (Doc Ref. 5.2)).

4.5.66 In addition, two existing exit lanes (northern and southern approaches) from the secure airside area would be reconfigured to allow vehicular entry, in order to ensure that there are sufficient vehicle entry points from landside to airside (shown on **Figure 5.2.1a**).

Extensions to North and South Terminals

4.5.67 Extensions to the existing North and South Terminals are proposed to accommodate passenger

growth. In addition, a number of internal changes are proposed within the terminals to allow for changes in technology and innovative approaches to passenger experience and baggage handling. The main external extensions are shown on **ES Figure 5.2.1a** (Doc Ref. 5.2).

North Terminal

4.5.68 Works proposed to the North Terminal include the following.

- extensions to the International Departure Lounge (IDL), to both the north and south of the current facility. The northern expansion would occupy a footprint of approximately 3,300m^2 and result in additional floorspace of approximately 9,900m^2 over Levels 20, 30 and 40 to provide a mix of retail, catering and general circulation space. The ground floor would provide coaching facilities for autonomous vehicle transit to Pier 7. The extension would be up to approximately 32.5 metres in height (above ground level). The southern extension would be up to 119 x 105 metres and up to 27.5 metres in height (above ground level). This would result in additional floorspace of approximately 12,600m^2 over Levels 10, 20 and 30 and provide a mix of catering, retail and general circulation space. The extension would be up to approximately 27.5 metres in height (above ground level).
- an extension to the baggage hall (providing baggage handling facilities), occupying a footprint and floorspace of approximately 6,552m^2. The extension would be two storeys and up to approximately 12.5 metres in height (above ground level).
- an extension to baggage reclaim with a footprint of approximately 650m^2. The extension would be up to approximately 7 metres in height (above ground level).
- internal reconfiguration works to facilities such as check in zones, baggage systems and security.
- an autonomous vehicle station (shown on **ES Figure 5.2.1d** (Doc Ref. 5.2).

South Terminal

4.5.69 Works proposed to the South Terminal include the following:

- an extension to the IDL, occupying a footprint of approximately 3,780m^2 and resulting in additional floorspace of approximately 15,000m^2 over Levels 10, 20, 30 and 40 to provide a mix of retail, catering and general circulation space. The extension would be up to approximately 27 metres in height (above ground level).
- internal reconfiguration works to facilities such as check in zones, baggage systems and security.
- provision of a two-storey coaching gate for autonomous vehicle transit to Pier 7.
- additional coaching gates (four gates with a footprint of approximately 3,780m^2 and two gates with a footprint of approximately 1,980m^2 and both and up to 13 metres high).
- an autonomous vehicle station (shown on **ES Figure 5.2.1d** (Doc Ref. 5.2)).

Hotel and Commercial Facilities

4.5.70 Additional office and hotel provision is proposed to meet the needs of airport companies and passengers (as shown on **ES Figure 5.2.1c** (Doc Ref. 5.2)).

Offices

4.5.71 A new office block is proposed on the existing car park H site. This would comprise one office building with a net lettable floorspace of up to 5,000m^2, a footprint of 1,024m^2 and up to 27 metres

high (above existing ground level).

Hotels

4.5.72 Four additional hotels are proposed as follows (as shown on **ES Figure 5.2.1c** (Doc Ref. 5.2):

- one new hotel (up to 400 bedrooms) in the location of existing car park H at South Terminal (up to 27 metres in height and with a footprint of approximately 0.4 hectares). The hotel would be located within the area of the site shown on **ES Figure 5.2.1c** (Doc Ref. 5.2);
- one new hotel (up to 400 bedrooms) on a site adjacent to and north of MSCP3 at South Terminal (up to 27 metres in height and with a footprint of approximately 0.4 hectares);
- one new hotel (up to 200 bedrooms) on the site of the current car rental facility at South Terminal (up to 16.3 metres in height and with a footprint of approximately 1.5 hectares); and
- Conversion of Destinations Place offices located at South Terminal to a hotel (up to 250 bedrooms). Any external changes would not exceed the width of the existing building and the height of the existing roof plant and equipment.

Car Parking

4.5.73 A range of on-airport car parking is currently provided. Full details are provided in **ES Chapter 4: Existing Site and Operation** (Doc Ref. 5.1). In addition to the existing provision, three new car parks would be implemented in the absence of the Project to serve the projected increase in passenger numbers (these form part of the future baseline). These improvements would add 6,570 spaces and take the future baseline car parking provision to approximately 53,270 spaces in the absence of the Project.

4.5.74 Several car parks would be impacted during the construction phase of the Project and other car parks are permanently lost to works included in the Project. The car parking strategy for the Project allows for the replacement of impacted car parks and new car parking to be located on airport and to be included within the Project to cater for growth. The following car parking spaces would be permanently lost as part of the Project (their locations are shown in **ES Figure 5.2.1h** (Doc Ref 5.2)):

- Summer Special – 3,345 spaces
- North Terminal Long Stay and Flying Pan – 2,465 spaces
- Staff parking (W, B and H) – 1,150 spaces
- Purple Parking– 820 spaces
- Car Park X – 1,125 spaces

4.5.75 New car parking is proposed to meet additional demand generated by the Project, taking into account GAL's **Surface Access Commitments** (Doc Ref. 5.3) to increase the share of passenger and staff journeys made by sustainable modes (Table 4.2). Following discussions with local planning authorities and taking account of responses to the Summer 2022 Consultation, GAL is not seeking permission to re-provide capacity that may be withdrawn because of enforcement action on unauthorised, off-airport sites. Table 4.1 sets out the car parking provision proposed as part of the Project (see **ES Figure 5.2.1b** (Doc Ref. 5.2) for locations of the proposed car parks).

Table 4.2: Proposed Additional Passenger Car Parking

Type	Approximate Footprint (hectares)	Maximum Height (above ground level)	Approximate Car Parking Spaces
North Terminal Long Stay (decked parking)	7.9ha (350 x 225 metres)	11 metres	1,680
Car park J multi-storey	1.0ha (120 x 80 metres)	27 metres	890
Car park Y multi-storey	1.9ha (100 x 195 metres)	27 metres	3,035
Car park H multi-storey	1.5ha (150 x 100 metres)	27 metres	3,700
At the existing GAL Purple Parking Valet site	2.9ha	(Surface level only)	700
Total			**10,005**

4.5.76 The existing 'Purple Parking' (operated by a third party) which comprises 3,280 car parking spaces would be relocated to make way for the end around taxiway west. The relocation of this parking provision is proposed at the eastern section of existing staff car park X as shown on **ES Figure 5.2.1b** (Doc Ref. 5.2). The relocation of Purple Parking would displace 1,125 on-airport car parking spaces from car park X (that would be accommodated through the re-use of the existing Purple Parking site and extra capacity at the North Terminal Long Stay car park).

4.5.77 The relocated Purple Parking would accommodate 3,280 car parking spaces (to re-provide the same number as the existing site). The relocated facility would comprise a stepped, decked area part of which provides one storey and the remainder providing two storeys above surface level. This decked area would be two storeys of up to 11 metres in height with a footprint of 120 metres by 70 metres in the south eastern section and immediately to the north of this, one storey of up to 7 metres in height with a footprint of 120 metres by 20 metres. The remaining area to the north and west of the decked area would be surface parking. Access to the Purple Parking site could be provided from Charlwood Road or from Perimeter Road South.

4.5.78 At the existing Purple Parking site, the decking would be demolished and approximately 0.24 hectares of surface parking would be removed (**ES Figure 5.2.1h** (Doc Ref. 5.2)). A fence line would be erected along the boundary with the revised end around taxiway. The remaining surface parking would be reconfigured to create 700 car parking spaces (partially re-providing the equivalent of the 1,125 spaces displaced from existing car park X). The remaining 425 spaces displaced from car park X would be accommodated through an increase in capacity in the North Terminal Long Stay car park. Further spaces to accommodate growth will also be provided within North Terminal Long Stay.

4.5.79 No increase in car parking for airport staff is proposed and where staff parking is located may change as a result of the Project works. Historically, Gatwick had around 7,200 spaces for staff. However, as staff car mode share has decreased, GAL has taken steps to reduce this by over 1,000 spaces in the last five years. GAL is currently reviewing the optimum allocation of spaces and location for these staff spaces, taking into account an increase in staff numbers and changing

work patterns but alongside promoting use of more sustainable travel to work, including car sharing and active travel. Overall, it is proposed to continue to reduce the total number of spaces provided per 1,000 employees across the airport.

4.5.80 Table 4.3 shows the overall changes to car parking spaces, taking into account the future baseline, and sets out the spaces that would be permanently lost and proposed replacement spaces.

Table 4.3: Car parking proposals

Permanently Lost Spaces		Proposed Replacement Spaces		Proposed Additional Spaces	
Summer Special	-3,345	MSCP Car Park Y	3,035	NT Long Stay Decking	1,100
NT Long Stay & Flying Pan	-2,465	MSCP Car Park J	890	-	-
Staff Parking (W, B & H)	-1,150	MSCP Car Park H	3,700	-	-
GAL 'Purple Parking' Valet	-820	GAL 'Purple Parking' Valet	700	-	-
Car Park X	-1,125	NT Long Stay Decking	580	-	-
TOTAL	**8,905**	**-**	**8,905**	**-**	**1,100**

Surface Access Improvements

4.5.81 Improvements are proposed for the highways and active travel routes that serve both the South Terminal and North Terminal roundabouts. The designs and details have been subject to road traffic assessment and detailed engagement with highway authorities, including National Highways. The proposals for surface access reflect refinements made following consultation responses and engagement with National Highways and local highway authorities regarding junction layouts and active travel routes for pedestrians and cyclists.

4.5.82 To accommodate the proposed increase in passenger numbers, the following surface access improvements are proposed as part of the Project:

- South Terminal: new junction layout providing full grade separation.
- North Terminal: new junction layout including partial grade-separation, improving traffic flow. The Airport Way eastbound connection from North Terminal roundabout would be removed with eastbound traffic to travel via a new signal-controlled junction on the A23 London Road and an enhanced eastbound diverge connection onto Airport Way.
- Enhancement of the eastbound M23 Spur as part of the South Terminal roundabout improvements, should this not be completed by others in advance of the airport expansion.
- Improvements to Longbridge Roundabout where the A23 meets the A217.
- Investment in public transport service enhancements, both locally and to improve accessibility for areas not directly served by rail.
- New and enhanced active travel routes providing safe connections from surrounding areas.

4.5.83 The approach to construction is to avoid or minimise periods of road closures to reduce impacts

on road traffic. It is anticipated that operation of the existing roads/junctions would be maintained during construction of these improvements, although there would be periods where capacity would be reduced (either through narrow lane running or lane closures).

4.5.84 The proposed surface access improvements are shown on plans in **ES Appendix 5.2.1: Surface Access General Arrangement Plans** (Doc Ref. 5.3) and described below.

4.5.85 Associated drainage works to accommodate any surface water run-off as a result of the highway improvements are included in the Project for each junction.

South Terminal Junction Improvements

4.5.86 The South Terminal roundabout, M23 Junction 9a (also known as the “Welcome Roundabout”) is the sole entry point into the South Terminal area and for local access roads, including the South Terminal forecourt, long stay car parks and commercial premises. It is served by the M23 Spur to the east (leading from the M23 Junction 9) and Airport Way from the west (leading from North Terminal roundabout). The majority of Gatwick traffic accesses the airport from the M23 and traffic for both North Terminal and South Terminal must pass through this roundabout.

4.5.87 The westbound M23 Spur was upgraded as part of the National Highways M23 Junctions 8 to 10 Smart Motorway Project, completed in Summer 2020 and is now a dual carriageway with three lanes per direction. The eastbound M23 Spur was not widened at the time of the westbound works. Further local improvements to South Terminal roundabout, involving signalisation and minor widening of entries/exits, are proposed in the absence of the Project (these form part of the future baseline and are outlined **in Section 4.4** in **ES Chapter 4: Existing Site and Operation** (Doc Ref. 5.1).

4.5.88 The Project proposes that the M23 Spur would be reclassified as an A road (to be known as the “Gatwick spur"). The main carriageway would be raised, through the provision of a flyover bridge (the “South Terminal Flyover Bridge") above the existing roundabout, with on and off slip roads in both directions linking the flyover to the roundabout. The elevated Gatwick Spur/Airport Way would be approximately 8 metres above the existing ground level at its midpoint after allowing for deck construction and surfacing. The length of the flyover structure would be approximately 130 metres. Earthworks would support the approach to the bridge and reinforced earth-walls or retaining walls would be required between the main carriageway and slip roads.

4.5.89 To the west of the roundabout, the main carriageway would tie into the existing alignment before the bridge over the Brighton Main Line railway (Airport Way Rail Bridge). A third lane would be added westbound over the railway from where the improved westbound on-slip joins the main carriageway. To the east, the main carriageway flyover and slip roads to/from the roundabout would tie into the existing carriageway approximately 160 metres east of the bridge over the B2036 Balcombe Road (Balcombe Road Underbridge). As the flyover would be above the existing road level as it passes over Balcombe Road this requires the raising of the existing road level over the bridge by approximately 2.2 metres. This would require substantial widening and strengthening of this bridge, and the assumption is therefore for a full replacement. The eastbound Gatwick spur would be converted to three lanes.

4.5.90 The works at the South Terminal Junction would include the provision of a noise barrier. The barrier (approximately 600 metres in length and approximately 1 metre in height above highway verge) would be located along the elevated section of highway. The location of the noise barrier is

shown on **ES Figure 5.2.1g** (Doc Ref. 5.2).

4.5.91 South of the M23 spur there would be an additional pedestrian route linking Balcombe Road to the existing footway on the east side of Ring Road South approaching the South Terminal forecourt and railway station.

North Terminal Junction Improvements

4.5.92 The North Terminal roundabout is the entry point to the North Terminal and local access roads, including the northern and east perimeter roads. The existing layout consists of a circular five-arm at-grade roundabout to the north east of the North Terminal and south west of the A23 London Road. There is currently no direct entry to the roundabout southbound from Horley and no direct exit from the roundabout on to the A23 London Road southbound towards Crawley. Local improvements are proposed in the absence of the Project (see Section 4.4 in **ES Chapter 4 Existing Site and Operations** (Doc Ref. 5.1)). These improvements would include local widening on the junction entry/exit lanes for the North Terminal roundabout, together with signalisation of the roundabout and provision of enhanced signage.

4.5.93 A partial grade-separated junction design is proposed. The size of the existing roundabout would be increased to a larger diameter to create extra capacity and changes made to entry and exit routes. As part of this solution, an elevated flyover (North Terminal Flyover Link) would be built to carry traffic between Airport Way (from South Terminal and the M23) and the A23 London Road towards Horley. This would provide extra capacity for movements to and from the airport and would separate airport and non-airport traffic, reducing conflict in peak periods, thereby reducing congestion. Additional improvements would be made to Gatwick Way to accommodate an increase in traffic flow towards Northgate Road.

4.5.94 The exit from the roundabout eastbound towards Airport Way would be replaced by a connection via a new signalised junction with the A23 London Road (A23 London Road/North Terminal Link Signal-Controlled Junction) and an enhanced free-flow A23 London Road Southbound Diverge to Airport Way Eastbound. This would remove the need for a merge between traffic leaving the southbound A23 heading towards the M23 and the eastbound Airport Way. The new junction on the A23 London Road would also facilitate a direct movement from the airport to the southbound A23 towards Crawley, removing a current constraint. It is also proposed to introduce a pedestrian crossing at this junction linking the existing footway along the north side of the A23, which would be improved, to Longbridge Way. Northbound traffic from the roundabout heading towards Horley on the A23 London Road would also use this signalised junction with the proposed North Terminal Link replacing the existing arm from the roundabout. Northbound traffic on A23 London Road heading towards North Terminal Roundabout would utilise the proposed replacement A23 London Road Northbound Left-in Diverge to North Terminal Roundabout. The road surface level of the elevated link (North Terminal Flyover Link) from Airport Way towards Horley would sit approximately 8 metres above surrounding ground level to provide the required clearances as stipulated by National Highways' safety and design standards.

4.5.95 The flyover structure (North Terminal Flyover Bridge) is anticipated to require one span to cross the at-grade carriageways of North Terminal Link and A23 London Road Northbound Left-in Diverge to North Terminal Roundabout and the bridge is expected to comprise a typical steel beam superstructure with a concrete slab deck on concrete abutments and piers, with piled foundations. The structure span would be approximately 45m long. Retaining walls would be

required to separate adjacent links and other infrastructure assets at different levels or gradients. The bund behind the Premier Inn and petrol station on Longbridge Way would be altered to accommodate the earthworks that would support the flyover.

4.5.96 Airport Way including the Airport Way Rail Bridge would be widened to accommodate a third lane westbound over the railway line, which would require alterations to the embankment on the south side of Airport Way to the east and west of the railway. National Cycle Route 21 currently passes beneath Airport Way in close proximity to the embankment works and this section would need to be temporarily closed during construction to ensure the safety of users. A temporary alternative route would be provided so that access is maintained throughout construction. This is shown in Annex 1, Figure A in **ES Appendix 19.8.2**: **Public Rights of Way Management Strategy** (Doc Ref. 5.3).

4.5.97 The proposed highway improvements incorporate noise barriers, which have been revised since the Autumn 2021 and Summer 2022 Consultations. The works at the North Terminal Junction would include the provision of one noise barrier located along the elevated section of highway carrying the westbound link from Airport Way to the A23 London Road (shown on **ES Figure 5.2.1g** (Doc Ref. 5.2)). This would be approximately 800 metres in length and approximately 1 metre in height.

4.5.98 The highway bridge carrying the A23 London Road over the River Mole (A23 London Road Bridge over River Mole) would be widened to accommodate three lanes westbound, extending the length of three lane carriageway back from Longbridge Roundabout to where the new westbound flyover merges with the A23 London Road and to accommodate proposed pedestrian and cyclist infrastructure provision.

Longbridge Roundabout Improvements

4.5.99 Works are proposed to the Longbridge roundabout, including alterations to the existing layout. Options have been considered in relation to operational capacity, compliance with design standards and impact on surrounding land and property.

4.5.100 It is proposed to substantially improve the roundabout and provide increased lane widths on the circulatory carriageway to better accommodate vehicle turning movements. The current lanes create a capacity restriction due to goods vehicles needing to straddle two lanes for certain manoeuvres. Enhanced active travel infrastructure would be provided in the vicinity of the roundabout (see plans in **ES Appendix 5.2.1: Surface Access General Arrangement Plans** (Doc Ref. 5.3)), comprising:

- significant sections of segregated path for pedestrians and cyclists and signalised crossings allowing enhanced access across all arms of the roundabout.
- provision of a shared use path between the roundabout and Riverside Garden Park including the provision of a new proposed shared pedestrian and cyclist ramp to the south-east of A23 London Road River Mole bridge to provide enhanced connectivity to and from the park for pedestrians and cyclists.
- cyclist ramp on A23 Brighton Road eastbound at the termination point of the shared use path to enable cyclists to rejoin the road carriageway.

4.5.101 The proposed new roundabout would have a slightly larger diameter and would extend further west and north to accommodate the wider circulating lanes, enhanced active travel infrastructure

and improved capacity on exit and entry lanes, particularly for the A23 Brighton Road arm to and from Horley. The existing segregated left turn lane from the A23 Brighton Road southbound into the A23 London Road eastbound would be widened along with the associated structures supporting this section of the highway and would incorporate a shared use path heading east from the roundabout. To the northeast of the roundabout, where the A23 Brighton Road crosses the River Mole, an access route for construction would be required via Woodroyd Avenue, past the garages to access to the land to the east of Brighton Road adjacent to the River Mole. The Project site boundary has been modified following the Autumn 2021 consultation which enables retention of an area of vegetation to the east of the roundabout and south west of the River Mole.

4.5.102 A third lane northbound would be introduced on the A23 London Road between the North Terminal Flyover Link merge and Longbridge roundabout. The A23 Brighton Road bridge over the River Mole would be replaced with a widened bridge to accommodate a widened highway and active travel infrastructure at this location.

Forecourts

4.5.103 North Terminal Forecourt comprises North Terminal Approach, Furlong Way, Racecourse Way, Arrivals Road, Departures Road, Coach Road and Northway. These links provide access to the terminal frontage, drop off areas, bus and coach stands, car rental facilities, short stay car park entrances and taxi ranks. Departures Road includes a restricted access link to the Upper Forecourt for premium drop off (limited to certain airlines only). Long stay car parking at North Terminal is accessed via Longbridge Way as a separate access off North Terminal roundabout.

4.5.104 South Terminal Forecourt comprises Ring Road South, Eastway, Westway, Coach Road, Upper Forecourt, Lower Forecourt and Ring Road North. These links provide access to the terminal frontage, drop off areas, bus and coach stands, coach parking, car rental facilities, long stay and short stay car park entrances and taxi ranks. Upper Forecourt has restricted access and is used for airport taxis, car park shuttle buses and prior to the pandemic provided access for the electric hire car fleet.

4.5.105 The forecourts and approaches to both existing terminals are proposed to be reviewed and enhanced within existing boundaries, to maintain effective routes providing access to the terminal frontage, multi-storey and long stay car parks, hotels and pick-up and drop-off areas for different transport modes. The locations of the forecourt works are shown on **ES Figure 5.2.1d** (Doc Ref. 5.2).

Proposed active travel improvements

4.5.106 The locations of the proposed active travel improvements described below are shown on **ES Figure 5.2.1d** (Doc Ref. 5.2) with further details provided in the plans in **ES Appendix 5.2.1: Surface Access General Arrangement Plans** (Doc Ref. 5.3).

4.5.107 To improve active travel routes between Longbridge roundabout and North Terminal, enhanced active travel infrastructure is proposed. This would comprise a segregated path for pedestrians and cyclists between Longbridge roundabout and North Terminal roundabout with a localised narrowing to shared use on the A23 London Road bridge over the River Mole.

4.5.108 To improve active travel routes between Horley and the airport, enhanced active travel infrastructure is proposed. This would comprise:

- three staged staggered signalised crossing for pedestrians at the northern arm of the A23 London Road / North Terminal Link signal controlled junction.
- signalised pedestrian crossing on Longbridge Way between the Shell petrol station and the approach to the North Terminal roundabout.
- a footway suitable for potential future use as a shared path for pedestrians and cyclists, on the northern side of the North Terminal link between the A23 London Road / North Terminal Link signal controlled junction crossing and the proposed signalised crossing on Longbridge Way.

4.5.109 Between North Terminal roundabout and South Terminal there would be a shared use path for pedestrians and cyclists with a signalised crossing at North Terminal Approach leading to a widened footway along the northern side of Perimeter Road North permitting shared use.

Bus and Coach Improvements

4.5.110 GAL has identified areas of Surrey, Kent and Sussex where improved public transport service coverage would increase the proportion of staff and passengers travelling by public transport in support of GAL's sustainability goals. GAL would invest in securing these routes and fund their operation in partnership with a suitable operator. GAL would also increase the subsidy provided to Metrobus to enhance the service frequency, hours of operation and reach of local bus services in line with mode share targets. This would also improve accessibility between the airport and nearby communities. GAL has an established approach to providing this funding support via its Sustainable Transport Fund.

Rail Improvements

4.5.111 Improvements to Gatwick Station have been subject to a separate consenting process, with a planning application submitted by Network Rail to Crawley Borough Council in April 2018 and consented in March 2019 (this is included in the future baseline). These improvements commenced in 2020 and are due for completion in 2023.

4.5.112 No further improvements are proposed or are necessary to the rail station platforms or concourse to accommodate the peak flows generated by the Project.

Water Management

4.5.113 The existing airport drains to local watercourses via balancing ponds and attenuation lagoons. In order to accommodate the alterations to the northern runway, to allow for the areas of new development and to meet current planning requirements (including an allowance for climate change), revisions to the existing surface water drainage system are proposed (**see ES Figure 5.2.1e** (Doc Ref. 5.2)).

4.5.114 A flood risk mitigation approach has been developed for the Project in consultation with the Environment Agency and West Sussex County Council in their role as Lead Local Flood Authority (see Section 7 of **ES Appendix 11.9.6: Flood Risk Assessment** (Doc Ref. 5.3)). For fluvial flood risk, the approach ensures that no adverse impact would be likely off site in up to a 1% (1 in 100) annual exceedance probability (AEP) event with a 20% allowance for climate change ("the 1% AEP event + 20% cc"). Indicative designs for fluvial mitigation measures are identified in Annex 1 of **ES Appendix 11.9.6: Flood Risk Assessment** (Doc Ref. 5.3).

4.5.115 The Surface Access Highways Surface Water Drainage Strategy (see Annex 2 of **ES Appendix 11.9.6: Flood Risk Assessment** (Doc Ref. 5.3)) for surface water runoff provides for different standards of protection for the highways and airfield elements of the Project due to differing projected design lives (this is explained further in Table 3.3.1 of **ES Appendix 11.9.6: Flood Risk Assessment** (Doc Ref. 5.3). The airfield elements have a shorter design life than the highways and are designed to accommodate a 1%AEP event + 20% cc. The highways elements are designed to the 1% AEP event +40% cc.

4.5.116 Proposed measures across the Project include the following:

- works to realign existing surface water drainage infrastructure along Taxiway Yankee, providing a connection to Pond D.
- works to protect the existing Substation L from flooding.
- removal of airfield drainage Pond A and connection of the catchment to Pond M.
- provision of surface water storage beneath car park Y of up to 32,000m^3 to reduce the risk of North Terminal flooding.
- new treatment works south of the pollution storage lagoons on the site of the former Rolls Farm to provide for greater capacity in the pollution storage network and allow improvements to water quality at the discharge from Pond D.
- diversion of part of the River Mole corridor.
- provision of additional floodplain capacity, through provision of the following flood compensation areas within the airport boundary.:
    - Museum Field: Lowering of the existing ground levels in an area known as Museum Field along the western boundary of the site, north of the fire training ground.
    - Car park X: Lowering of the existing ground levels in car park X.
- a small weir to the River Mole.

Museum Field

4.5.117 Museum Field (shown on **ES Figure 5.2.1e** (Doc Ref. 5.2)) would be lowered by up to approximately 2.6 metres below ground level. It would have a footprint of approximately 57,600m^2. This would provide a new flood compensation area connected to the River Mole. The connection to the spillway would require local lowering of the bank of the River Mole. There would be a landscaped bund along the southern and eastern perimeters that would be approximately 6 metres high and a footpath (including footbridge) around the area. There would be a road to enable maintenance access of approximately 5 metres width.

Removal of pond A and creation of new section of River Mole valley

4.5.118 Pond A would be removed and filled in as a result of the move northwards of taxiway Juliet and the work to create level ground in a strip around the taxiway. The River Mole would be diverted to the north of its current course and would take a more sinuous route than the current alignment over an approximately 300 metre length of new river valley (see **ES Figure 5.2.1e** (Doc Ref. 5.2)).

4.5.119 The existing River Mole syphon and river channel at the exit to the culvert would require extension. The channel that the River Mole runs in from the exit to the existing culvert would be

extended northwards by 36 metres to enter the new section of river valley. The portion of the River Mole which crosses below the level of the new taxiway strip would be carried in a new section of concrete channel covered by a road traffic specification grid at ground level, for a length of 26 metres to where the river leaves the airfield boundary. The use of the grid would allow daylight to reach the watercourse. The River Mole syphon (which activates only in flood conditions) would be extended in a new section of box culvert of around 36 metres in length to connect to the new section of river valley.

Water treatment works

4.5.120 The proposed water treatment works would use a Moving Bed Biofilm Reactor (MBBR) process. It would draw at least 100 l/sec from de-icer pollution storage lagoons and treat this to a standard that would allow discharge to the Gatwick Stream. The works would be located towards the south east of the Project site (shown on **ES Figure 5.2.1e** (Doc Ref. 5.2)), on the site of the former Rolls Farm. The plant would have a footprint of up to 5,600 m^2 and a maximum height of 8 metres and a depth of up to 3 metres. The outfall pipe would connect into an existing overflow pipe from the pollution storage lagoon.

Car Park X

4.5.121 The existing car park X (shown on **ES Figure 5.2.1e** (Doc Ref. 5.2)) would be lowered by a depth of up to 2 metres. It would be 90 x 300 metres and have a footprint of 27,000m^2. It would create approximately 55,000 m^3 flood storage and would be reinstated as a surface car park. The car park would be used partly for staff car parking and partly for the re-provided Purple Parking following completion of the excavation works, with restrictions on its use when flooding is anticipated.

4.5.122 Car park X would be connected to the River Mole via an outfall structure, which may take the form of a flapped culvert or other arrangement to allow fish to pass back into the River Mole following a flood event. A ramp from the existing road network would be provided to allow access to car park X.

Car Park Y attenuation storage

4.5.123 An attenuation facility would be provided at car park Y (shown on **ES Figure 5.2.1e** (Doc Ref. 5.2)). The greater the amount of storage provided, the greater the benefit in terms of flood extent and depth. Flood modelling has tested a range of storage capacities from 10,000m^3 to 32,000m^3. Provision of up to 32,000m^3 of capacity significantly reduces risk of flooding to the North Terminal.

4.5.124 The structure would fit within the footprint of and structurally support the proposed multi storey car park that would be built above the storage facility. The depth of floor would be at 49.5 metres AOD with an outlet box culvert of 3 metres by 1.2 metres. The inlet to culvert would be at 53.3 metres AOD connecting to the existing inlet structure of pond D. The excavation depth would be approximately 8-10 metres deep depending on the foundation solution. The site would be backfilled and restored to a car park upon completion, and this would be at 57 metres AOD. The storage would be up to 125 by 75 metres with a footprint of 9,375m^2.

Weir to River Mole

4.5.125 A small weir (200mm high) is proposed to the River Mole across the southern face of the east box of the culvert that conveys the river beneath the runways (see **ES Figure 5.2.1e** (Doc Ref. 5.2)). This would enable the concentration of summer low flows in the west box to improve fish passage.

Foul Water

4.5.126 In order to provide for the new and improved facilities, including wastewater from the extended terminals, hotels and Pier 7, changes would be required to the foul drainage system to improve capacity and resilience (key components are shown in **ES Figure 5.2.1e** (Doc Ref. 5.2)).

4.5.127 A new pumping station (Pumping Station 7a) would be provided near the existing Pumping Station 7, to accommodate flows from the extended North Terminal and Pier 7 and a pipeline connection to Crawley Sewage Treatment Works. The proposed pumping station would have a fenced compound with an area of 260m^2 and be approximately 3 metres in height (above ground level) with elements up to 6 metres below ground level. It is estimated to have a capacity of approximately 80 litres/second.

4.5.128 A second new pumping station to the east of the railway is proposed to decouple the existing sewerage network east of the railway and remove its load from the South Terminal sewerage system. This would include a new underground pipeline connection between the new pumping station and the Crawley Sewage Treatment Works. The indicative corridor of the pipeline route has been designed to avoid the ancient woodland and make use of existing tracks. It would be up to 1,270 metres in length and require a construction corridor of up to 10 metres wide to install (the indicative corridor is shown in blue in Figure 5.2.1e). The proposed pumping station would require a fenced compound with an area of 190m^2 and be approximately 3 metres in height (above ground level) with elements up to 3 metres below ground level. It is estimated to have a capacity of approximately 45 litres/second.

4.5.129 A third new pumping station (Pumping Station 2a) is proposed and new connections via Pumping Station 2 (that would be demolished) and the main sewer. The proposed pumping station would require an area of approximately 10m^2 and be approximately 2 metres in height (above ground level) with elements up to 10 metres below ground level. It is estimated to have a capacity of approximately 40 litres/second.

4.5.130 Further proposed improvements include upgraded capacity to existing pipelines, rerouting connections and decommissioning of a number of existing pumping stations (including Pumping Stations 3, 4 and 5 and 17, as shown in **ES Figure 5.2.1h** (Doc Ref. 5.2)). Pumping Stations 4 and 5 would be converted for use as temporary cesspits for tankering operations (see **ES Figure 5.2.1e** (Doc Ref. 5.2)). There would be a new rising main for Pumping Station 40.

Potable Water Consumption

4.5.131 GAL has a Decade of Change (GAL, 2021) sustainability target to reduce its potable water consumption from approximately 15l per passenger to around 7.5l per passenger by the end of the decade. The output from the treatment facilities at the pollution storage lagoons could be used as a grey water supply to the airport to assist with meeting this goal, combined with the

application of other water efficient methods/technologies and leakage reduction. For the purposes of the environmental assessment, it is assumed that consumption remains at 15l per passenger.

Power Strategy

4.5.132 A number of adjustments are proposed to the existing power facilities, including relocation of a number of existing services, cables and substations. Part of the existing airfield high voltage ring would be repositioned to the north to allow for the alterations to the existing northern runway and Taxiway Juliet. Locations of the substations to be demolished are shown in **ES Figure 5.2.1h** (Doc Ref. 5.2) and locations of new or re-provided substations are labelled on **ES Figure 5.2.1a** (Doc Ref. 5.2).

4.5.133 Existing substations A, J, BK, BP and BR would be demolished and re-provided to accommodate the following new facilities:

- Substation J: a priority substation, forming part of the airfield ring. The new substation is likely to comprise a containerised substation, with an additional transformer to replace. Substation BM. The substation would occupy an area of approximately 180m^2, with a height of 6 metres above ground level and 3 metres below ground level.
- Substation BK: to be re-provided approximately 12 metres north of the current location, within an area of approximately 144m^2, with a maximum height of 6 metres above ground level and 3 metres below ground level.
- Substations BP, BR and A: to be re-provided, each within an area of approximately 25m^2, with a maximum height of 5 metres above ground level and 3 metres below ground level.

4.5.134 In addition, a new substation is proposed to facilitate Pier 7. This would be located to the north east of Pier 7 and to the north of the cargo facility (**ES Figure 5.2.1a** (Doc Ref. 5.2)). This would require an area of approximately 25m^2, with a maximum height of 5 metres above ground level and 3 metres below ground level.

4.5.135 The relocation of substations and provision of additional capacity would allow for additional loads and would ensure that substations are located away from areas required for other purposes or at risk of flooding. The existing Substations BJ and BM would be demolished and not replaced.

4.5.136 The **Carbon Action Plan** in **ES Appendix 5.4.2** (Doc Ref. 5.3) includes commitments associated with emissions arising from energy use for buildings, infrastructure and operations.

Landscape and Ecological Planting

4.5.137 The landscape and ecological planting proposals comprise:

- vegetation retention to ensure green infrastructure assets are retained wherever possible, that important features (such as Riverside Garden Park) are protected and that adverse impacts on the important features at Gatwick are minimised. This would include protection of existing significant vegetation, including hedgerows, woodland, trees, shrubs, wetland and amenity planting or elements of the Project that lie immediately adjacent to significant vegetation that may be affected during the construction phase or during maintenance activities.

- provision of pedestrian routes, replacement areas of public open space at Horley and a pedestrian route from Riverside Garden Park to the replacement open space at car park B, a pedestrian footbridge from Church Meadows to the replacement open space to the west of the River Mole and associated publicly accessible land at Museum Field and Brook Farm;

- the ecology strategy as set out in **ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan** (Doc Ref. 5.3) is to facilitate the creation of a coherent and resilient ecological network that seeks to increase the biodiversity of the Project site in a controlled manner such that it integrates with and supports the existing ecology of the area. This includes creation of new, high value habitats including woodland, tree, scrub, shrub, wetland, amenity and grassland.

- enhancement of existing green infrastructure including hedgerows, woodland, trees, shrubs, wetland and amenity planting.

4.5.138 The above measures are detailed further in **ES Appendix 5.3.2: Code of Construction Practice** (Doc Ref. 5.3) and **ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan** (Doc Ref. 5.3).

4.5.139 Areas for proposed environmental mitigation included within the Project are set out below. Their locations are shown on **ES Figure 5.2.1g** (Doc Ref. 5.2):

- Approximately 0.79 hectares of land immediately to the west of the London to Brighton railway line, north of the current A23. This area is currently used as staff car parking (shown as car park B on **ES Figure 5.2.1b** (Doc Ref. 5.2)) and is proposed to provide replacement open space for the Project.
- Approximately 0.64 hectares of land immediately to the west of the London to Brighton railway line, south of the current A23. This area is currently used as staff car parking (shown as car park B on **ES Figure 5.2.1b** (Doc Ref. 5.2)) and is proposed to provide replacement open space for the Project.
- Approximately 0.52 hectares of land to the north east of Longbridge Roundabout. This would comprise landscape and ecological mitigation planting and a pedestrian footbridge of approximately 45 metres across the River Mole. The land on the west bank of the River Mole would offset the loss of recreational public open space in Riverside Garden Park and Church Meadows.
- Approximately 17 hectares of land to the west of the River Mole including the area of Museum Field. This area adjoins the current Gatwick Biodiversity Area that runs along the river corridor. The primary purpose for the inclusion of this area is for ecological habitat creation and flood compensation. For Museum Field, a 6 metre high landscaped bund around the southern and eastern perimeter is proposed. A pedestrian route, including footbridge, is proposed around the area used of Museum Field that would also be used as a flood compensation area.
- Two farm access bridges proposed over Mans Brook to allow landside maintenance in the locations shown as yellow circles on **ES Figure 5.2.1g** (Doc Ref. 5.2). These would be approximately 4.2 metres in width and would require clearance of approximately 1 metre either side of the bridges to enable installation.
- The River Mole diversion would provide opportunities for ecological mitigation in this area.
- Two areas of hedgerow are proposed to the south of the airfield to provide habitat connectivity as follows:

- along Perimeter Road East the existing leylandii hedge would be replaced by a species rich hedgerow (approximately 125 metres).
- along Crawter's Brook there is a 5-6 metre wide amenity grass verge. A short scrub hedge would be grown to provide a green corridor that links Crawter's Wood and habitat suitable for bats located to the west of Gatwick Airport. The detail of the planting would take into account aerodrome safeguarding so as not to infringe obstacle limits or create attractants to wildlife.

- a 15 metre belt of trees are proposed to be planted on the eastern edge of Pentagon Field, adjacent to the Balcombe Road.
- approximately 1 hectare of land to the south of Pentagon Field proposed for landscape and ecological planting.

4.5.140 Further details about the environmental mitigation areas are provided in **ES Chapters 8: Landscape, Townscape and Visual Resources** and **ES Chapter 9**: **Ecology and Nature Conservation** (Doc Ref. 5.1). Further information about replacement public open space is provided in **ES Chapter 19**: **Agricultural Land Use and Recreation** (Doc Ref. 5.1). Details of proposed planting are provided in **ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan** (Doc Ref. 5.3).

Public Rights of Way Strategy

4.5.141 The implementation of the Project would require the temporary diversion of Public Rights of Way (PRoW) and National Cycle Route 21, together with the permanent diversion of two PRoWs associated with the construction of the highways improvements. A PRoW Management Strategy is provided as **ES Appendix 19.8.2 Public Rights of Way Management Strategy** (Doc Ref. 5.3). It demonstrates a planned approach to the management of PRoW during the construction and operation of the proposed development which maintains public safety and ensures, as far as possible, minimal disruption to PRoW users.

Appearance and Design

4.5.142 Many of the components of the Project are relocated airfield elements and the appearance of the relocated facilities would be similar to the existing facilities. In some cases, the demolition of ageing facilities and replacement with more modern buildings is likely to result in an overall improvement in terms of appearance.

4.5.143 The proposed extensions to the airport terminals have been designed to 'tie in' and be in keeping with the design of the existing terminal buildings. Proposed works within the terminals would result in a more modern appearance through reconfiguration and installation of new facilities.

4.5.144 The operator of the proposed hotel buildings would inform the external appearance of these buildings, which would be determined prior to construction and in consultation with the local planning authority.

4.5.145 Information about the way in which environmental considerations have contributed to the design of the Project are described in **ES Chapter 3: Alternatives Considered** (Doc Ref 5.1). This includes demonstrating compliance with CAA and European Aviation Safety Agency (EASA) regulations and specifications as well as International Civil Aviation Organization (ICAO) design

recommendations or seeking exceptions in the form of deviations from the standard. An options appraisal process has been undertaken for the design of the Project components using criteria that include whether the option promotes good design.

4.5.146 Information about the design and access principles are provided in the **Design and Access Statement** (Doc Ref. 7.3) that accompanies the DCO application. This includes site wide design guidelines for the operational buildings.

Operational Lighting

4.5.147 An Operational Lighting Framework has been prepared and this is provided in **ES Appendix 5.2.2: Operational Lighting Framework** (Doc Ref. 5.3). This sets out the framework for the use of external lighting for the operation of the Project.

4.5.148 Objectives include the mitigation of impacts associated with lighting on sensitive receptors, such as residents, heritage sites and local flora and fauna. Obtrusive light (including flicker, glare, light intrusion and sky glow) are considered by reference to recommendations of relevant guidance notes for reducing obtrusive light and in relation to bats.

4.5.149 Objectives also include energy efficiency in design and operation (e.g. LED lighting, circularity); efficiency of energy supply (e.g. smart lighting controls), renewable energy integrated into the design of integrated of the new facilities (e.g. co-ordination of lighting with the car park canopy PV arrays).

4.5.150 Lighting design considerations are identified for roads, pedestrian crossings, pedestrian paths and cycleways, car parks, hotel and office buildings, aircraft stands and aeronautical ground lighting.

4.5.151 The design principles which will inform the lighting of the detailed design for the Project are in the Appendix to the **Design and Access Statement** (Doc Ref. 7.3).

Mitigation

4.5.152 A number of mitigation measures have been incorporated into the Project. These are described in the various topic chapters in the **ES** (Chapters 7 to 19) within sections describing Mitigation and Enhancement Measures Adopted as part of the Project). These measures plus further mitigation measures identified in the topic chapters to further reduce significant environmental effects are compiled in the **ES Appendix 5.2.3 Mitigation Route Map** (Doc Ref. 5.3) together with details of how they would be secured.

4.6 Approach to Construction

4.6.1 The anticipated construction methods, timing and sequencing are described in the sections below with further information provided in **ES Appendix 5.3.1**: **Buildability Report** (Parts A and B) (Doc Ref. 5.3) which provides further detail about the approach to construction.

4.6.2 Construction would be undertaken in accordance with the **Code of Construction Practice** as described in Section 5.3.81 of **ES Appendix 5.3.2: Code of Construction Practice** (Doc Ref. 5.3).

Indicative Construction Programme

4.6.3 The timing of the commencement of construction of the Project would be dependent on the timing of securing development consent and other relevant consents and licences and the discharge of the associated requirements. Facilities to support the growth of air traffic movements (ATMs) and passenger numbers would be sequenced to meet forecast demand and, where appropriate, to align with the main airfield construction. For example, construction of new remote aircraft parking stands would be required early in the programme to mitigate remote parking stands lost when Taxiway Lima would be built. Similarly, the construction of additional flood storage capability in an existing surface car park would necessitate the early provision of additional multi storey car park spaces to offset their loss. Those elements of the Project such as surface access, additional pier served stands, passenger processing capability, car parks and commercial facilities that are required for growth would be phased and delivered to meet ATM and passenger forecasts.

4.6.4 The indicative construction programme, developed to support the DCO application anticipates construction commencing in 2024 and continuing (across different scheme components) until approximately 2038 (as set out in Table 5.3.1 below). The assumptions which inform the indicative construction programme enable a representative assessment of the likely significant effects but are not fixed dates within a prescribed programme or sequence.

4.6.5 The indicative programme for the main airfield construction works is approximately five years' duration that would enable the altered northern runway and taxiways to be complete and fully operational in combination with the main runway in 2029. During the construction period the northern runway would not be available as a standby runway for a period of several months. The indicative sequencing of the construction works is outlined in Table 4.4.

Table 4.4 : Indicative Sequencing of Construction Works

Indicative Sequencing	Component of the Project
2023-2029	Pre-construction activities (including surveys for any unexploded ordnance and any necessary pre-construction surveys).
2024-2029	Early works, including establishment of compounds, fencing, early clearance and diversion works and re-provision of essential replacement services.
2024-2029	Reconfiguration of existing maintenance airfield facilities (Phase 1). Alterations to the existing northern runway. Airfield works to support use of the realigned northern runway.
2024-2033	Extensions to North and South Terminals.
2024-2032	Hotel and commercial facilities.
2024-2035	Car parking.
2024-2029	Flood compensation areas.
2028-2032	Surface access improvements including: ▪ South Terminal roundabout improvements (2029-2031) ▪ North Terminal roundabout improvements (2029-2031) ▪ Works to Longbridge roundabout (2028-2031)

Indicative Sequencing	Component of the Project
	▪ Opening to traffic 2032
2029-2034	Ongoing reconfiguration of existing maintenance airfield facilities (to final state). Further improvements to airfield facilities.
2030-2034	Pier 7.
2035	Reinstatement of final land use at temporary construction compound locations.
2038	Completion of all works for the Project.

4.6.6 Section 5.2 in **ES Chapter 5: Project Description** (Doc Ref. 5.1) and **ES Appendix 5.3.3: Indicative Construction Sequencing** (Doc Ref. 5.3) describes the indicative sequencing for the construction of the specific components of the Project together with the construction activities that are currently anticipated during those periods. The pre-construction activities are described and this is followed by construction activities anticipated to be undertaken, within the indicative sequencing, from 2024 to 2029 and also from 2029 onwards.

Construction Management

4.6.7 It is GAL's intention that the site would be registered under the Considerate Constructors Scheme or a locally recognised certification scheme.

4.6.8 Construction would be undertaken in accordance with a **Code of Construction Practice (CoCP)** (see **ES Appendix 5.3.2: Code of Construction Practice** (Doc Ref. 5.3). This legally secures the implementation of environmental mitigation measures for the construction of the Project. The mitigation measures identified in the CoCP have been identified through the EIA process and are reported in the ES. They describe how GAL will manage and minimise disturbance and other environmental impacts from demolition and construction activities (as identified in the ES). It also ensures that best practice standards will be applied and that there is a system in place for managing complaints.

4.6.9 GAL and its contractors will be required to implement the environmental management measures set out in the version of the Code of Construction Practice as approved by the SoS, for all construction activities authorised by the DCO to deliver the Project.

Construction Working Areas

4.6.10 The precise configurations of compounds would be determined post consent although they would be within the areas identified for the following main/satellite compounds (locations are shown in **ES Figure 5.2.1f** (Doc Ref. 5.3)):

- main contractor compound (known as MA1);
- airfield satellite compound (for most of the airfield works to the north west of the airfield);
- car park Z compound (for staging and laydown area for the airside works);
- car park Y compound (for material re-processing from the airside works and at a later stage surface access works);
- South Terminal roundabout contractor compound (main compound for surface access works);

- Longbridge roundabout contractor compound (for surface access works to the Longbridge Roundabout); and
- car park B compound (for surface access works at Airport Way Bridge over the London to Brighton railway line).

4.6.11 All construction compounds would be temporary and would be reinstated to their previous use following completion of construction works except car park B which would become replacement open space.

4.6.12 In addition, an area to the south east of the airfield, car park Z, would be used to support MA1 and the Airside satellite compound for HGV staging, parking and material laydown.

Construction Working Hours

4.6.13 Section 5.2 in **ES Chapter 5: Project Description** (Doc Ref. 5.1) provides more detail about each construction compound.

4.6.14 In order to maintain safety and minimise disruption to the operation of the airport, any work in close proximity to existing runways and taxiways would require the closure of facilities as operationally necessary and hence are likely to be scheduled to take place overnight.

4.6.15 During construction, the airport would continue to operate on a 24 hour, seven days per week basis. This would include use of the construction compounds and construction working areas on a daily 24-hour basis. Best Practicable Means (BPM) as defined by the Control of Pollution Act 1974 (CoPA) and Environmental Protection Act 1990 (EPA), would be applied during construction activities to minimise noise (including vibration) at neighbouring residential properties and other sensitive receptors (including local businesses and quiet areas designated by the local authority). Consent will be sought from the relevant local authority under the CoPA setting out the measures to minimise noise and vibration including the control of working hours.

4.6.16 Most of the construction for the surface access works would be within the normal working hours of 07:00 to 19:00 hours Monday to Friday and Saturday from 07:00 to 13:00.

4.6.17 Some works would need to be undertaken outside these hours including night working so as to minimise disruption to road users. Night closures of the London to Brighton railway line would be required to enable the construction works associated with the widening of Airport Way bridge. Such closures would be subject to prior discussion with and approval from Network Rail. Any working outside normal working hours would be agreed with the relevant local authorities/National Highways/Gatwick Airport operations and local residents would be informed in advance. Working adjacent to the railway line for the works associated with the railway bridge at Airport Way would be managed by possession planning, in which sections of the railway track would be closed to allow construction activities to be undertaken safely whilst minimising disruption to the railway network, which would need approval from Network Rail.

4.6.18 Further detail about extended working hours, 24/7 working hours and night-time working are provided in Section 5.1 of the **Code of Construction Practice** in **ES Appendix 5.3.2** (Doc Ref. 5.3).

Construction Workforce

4.6.19 It is anticipated that construction would require a workforce of up to approximately 1,350 personnel during peak periods.

Construction Access

4.6.20 Construction access routes would be agreed with the relevant highway authorities taking into account the following:

- prioritisation of routes to the strategic road network including major routes and A-roads.
- for local roads, construction access is not planned except where necessary to enable transport or delivery of locally sourced materials, which would be carefully managed.
- site access points would be constructed in accordance with relevant national and local highway authority standards.
- GAL would consult with the relevant Local Authorities and Emergency Services on the positioning of site access and egress points.
- GAL would monitor site accesses and public roads adjacent to access points to enable measures to keep accesses and roads clean and free of obstacles.

4.6.21 The **Outline Construction Traffic Management Plan (CTMP)** (see Annex 3 of **ES Appendix 5.3.1: Buildability Report** (Doc Ref. 5.3)) has been developed in accordance with the principles set out in **ES Chapter 12: Traffic and Transport** (Doc Ref. 5.1) and is described in the CoCP (see Section 6.6 of **ES Appendix 5.3.2: Code of Construction Practice** (Doc Ref. 5.3)). It sets out GAL's approach to managing the potential traffic impacts from construction traffic associated with the Project. The detailed CTMP will be developed post consent and will adhere to the principles and objectives of the **outline CTMP**. The **Construction Traffic Management Plan** would be secured by DCO requirements in Schedule 2.

4.6.22 In addition to the CTMP, a **Construction Workforce Travel Plan** will be implemented with measures to encourage construction workers to use more sustainable travel patterns. The **Construction Workforce Travel Plan** will be based on the principles set out in the **Outline Construction Workforce Travel Plan** that is provided in **Annex 2 of ES Appendix 5.3.1: Buildability Report** (Doc Ref. 5.3).

Spoil Strategy

4.6.23 The Project would produce approximately 1.5 million m^3 of excavated materials. Where possible this would be recycled and reused within the Project site. It is estimated that up to 670,000m^3 of excavated materials would need to be removed from the Project site. A further 235,000m^3 of potentially contaminated material would also require removal to appropriately licensed facilities offsite.

4.6.24 Pentagon Field has been identified as a spoil receptor site. This area would accommodate approximately 100,000m^3 of spoil.

4.6.25 The volume of concrete and asphalt would be approximately 620,000m^3. Approximately 555,000 m^3 of this would be crushed at the reprocessing area at Car Park Y. Whilst approximately 65,000m^3 is estimated to be contaminated.

4.6.26 Further detail is provided in the Construction Resources and Waste Management Plan (see Annex 5 of **ES Appendix 5.3.2: Code of Construction Practice** (Doc Ref. 5.3)).

Drainage during Construction

4.6.27 Temporary drainage would be required during the construction phase to prevent a temporary increase in flood risk as a result of the works. As far as practicable, these would consist of

Sustainable Drainage Systems (SuDS) features, such as swales and attenuation ponds, although some piped drainage and pumps may be required. Temporary drainage would be installed in all construction areas not currently provided with drainage systems, and in areas where the construction works have potential to increase surface water runoff, either due to ground compaction or reduction in surface permeability. The drainage would be designed to attenuate runoff rates in rainfall events up to the 1% (1 in 100) annual exceedance probability event to rates no higher than existing and to ensure any discharge to local watercourses or the existing drainage network is similarly attenuated. Suitable treatment would also be provided to manage the water quality of discharges to watercourses.

Construction Lighting

4.6.28 Lighting of the construction sites would be required to ensure that construction work is able to continue safely and effectively during the night-time works and other periods of insufficient natural light. This would include lighting to the construction working areas, storage and circulation areas and access points. Measures will be adopted to enhance the public sense of safety and security within and around the construction sites.

4.6.29 Task-based lighting will be provided for specific high-risk tasks and will be switched off after use and at the end of the working hours.

4.6.30 Lighting for construction compounds and workforce areas would incorporate restricted upwards light spillage and energy efficient fittings. Checks would be carried out on a regular basis to ensure that lighting has not been repositioned. Construction lighting will be designed, positioned and directed so as to avoid intrusion on adjacent buildings, sensitive receptors, ecological receptors (including bats) and structures used by other protected species, and additional land uses to prevent unnecessary disturbance.

4.6.31 Further detail about construction lighting is provided in Section 5.5 of **ES Appendix 5.3.2: Code of Construction Practice** (Doc Ref. 5.3).

Construction Waste

4.6.32 A **Construction Resources and Waste Management Plan** has been prepared and is provided at Annex 5 to **ES Appendix 5.3.2: Code of Construction Practice** (Doc Ref. 5.3). This sets out measures for managing waste during construction to meet legislative and policy requirements. It considers the waste arisings during the construction phase and the approach for managing wastes in accordance with the waste hierarchy principle. This also includes waste from the demolition/relocation of buildings and structures. The **Construction Resources and Waste Management Plan** also makes commitments relating to the sourcing of materials during construction.

4.7 Operation and Maintenance

Overview

4.7.1 GAL is the legal owner and operator of Gatwick Airport. This would remain the case throughout the construction phase and during operation of the airport with the Project in place. GAL therefore has overall responsibility for the management of Gatwick Airport, excluding aircraft maintenance.

4.7.2 A number of specific maintenance areas exist within the airport, including the Hangar 6 and Hangar 7 maintenance areas and the Boeing Hangar. These areas are the responsibility of the

airlines (BA, Atlantic, Boeing and easyJet) and it is anticipated that the same would apply to the proposed new hangar, once operational.

Operating Hours

4.7.3 As is currently the case, Gatwick Airport would remain operational on a 24-hour, seven days per week basis throughout the construction and operation of the Project. All terminal and hotel buildings and airport car parks are available on this basis.

4.7.4 Flights are subject to night-time restrictions between 23:00 to 07:00 local time in accordance with the London Heathrow, London Gatwick and London Stanstead Airports Noise Restrictions Notice published on behalf of the Department for Transport. Within the core hours of 23:30 to 06:00 a limited number of flights are permitted in accordance with noise and movements quotas. This is expected to remain the case with the Project in place with no increase in the quota count within core night hours of 23:30 to 06:00.

Operational Workforce

4.7.5 Around 24,000 employees worked on site in 2019, of which approximately 3,300 were employed directly by GAL. In 2020 and 2021, the pandemic led to a reduction in airport employees to an estimated 19,400 (this includes 11,700 furloughed employees) and GAL staff fell to 1,829. Airport employment has since started to return to previous levels with an estimated 20,450 workers in 2022 (based on Gatwick Airport Identification Card passholder data from 3 January 2023), of which 2,192 were GAL employees. On airport employment is expected to return to previous levels in the coming years, and the total number of employees on site is forecast to increase to over 27,000 by 2029 and then grow to approaching 30,000 for the future baseline scenario without the Project and 32,800 with the Project.

Surface Access Commitments

4.7.6 GAL has developed Surface Access Commitments (SACs) which represent the outcomes which GAL commits as part of the Project to achieving in relation to surface access at Gatwick. These SACs provide for GAL to implement a range of potential surface access interventions and set out the commitments GAL is making to a comprehensive monitoring exercise. Full details on these commitments and the way in which they interact with Gatwick's existing Surface Access Strategy and its future versions are provided in **ES Appendix 5.4.1: Surface Access Commitments** (Doc Ref. 5.3).

4.8 Sustainable Growth

GAL Second Decade of Change to 2030 Sustainability Policy

4.8.1 The Project is being developed alongside GAL's Second Decade of Change to 2030 Sustainability Policy[38] and 10-point plan which includes the following targets:

- **Local Economy –** being a partner and advocating for a thriving resilient economy including contributing to local and regional workforce skills and initiatives;

[38] [redacted]

- **Local Communities** – investing resources in programmes and partnerships in the region including supporting those communities that would be most affected by our operations;
- **Noise –** limiting, and where possible, reducing the airport's impact on local communities including working with partners and stakeholders to create the most noise efficient operations possible;
- **Airport Emissions –** reducing its Scope 1 and 2 emissions by a further 25% by 2030 (i.e. reach 80% under 1990 baseline) as part of a science-based goal of reaching net zero before 2040; sourcing 50% of its network electricity and 50% of heat network from UK renewable sources by 2030. GAL will generate power at or near the airport and buy renewable energy direct from suppliers; and by 2030, all on-airport vehicles must meet zero or ultra-low emission standards. This includes ground support equipment and mobile construction equipment;
- **Aircraft and Ground Transport Emissions –** increasing the number of passengers and staff using public transport. By 2030, 60% of journeys will be zero or ultra-low emissions; working with airlines and fuel providers, to support the Sustainable Aviation decarbonisation roadmap[39];
- **Water –** reducing the airport's drinking water consumption by 50% on a per passenger basis by 2030 (compared to 2019) and continuing to improve the quality of water leaving the airport;
- **Zero Waste –** ensuring that by 2030 all materials used at Gatwick in operations, commercial activity and construction, are repurposed for beneficial use (i.e. repaired, reused, donated, recycled, composted or converted to fuel for heating or transport); and
- **Biodiversity –** taking an industry-leading 'net-gain' approach to protecting and enhancing biodiversity at the airport including zero use of pesticides by 2030.

Sustainability Statement

4.8.2 The **Sustainability Statement** provided as **Appendix D** of this statement demonstrates how the core principles of sustainability have been considered during the design evolution of the Project and shows how these would be further embedded throughout its lifecycle, in accordance with relevant national, regional and local policy, guidance and standards.

Carbon Action Plan

4.8.3 A **Carbon Action Plan** (CAP) has been prepared by GAL. This is provided in **ES Appendix 5.4.2** (Doc Ref. 5.3). It builds on GAL's Second Decade of Change to 2030 and is aligned with UK Government's Jet Zero Strategy and other UK aviation and transport policy.

4.8.4 The CAP provides the outcomes that GAL will commit to and focuses on three areas:

- **Airport Buildings and Ground Operations**: The emissions arising from energy use for buildings, infrastructure and operations to provide heating, cooling, lighting and power needs; fuels for airside and landside vehicles; electricity transmission and distribution emissions; refrigerant losses; fuels for fire training; water consumption and treatment; and operational waste disposal and treatment.

[39] [redacted]

- **Aviation**: The emissions arising from aircraft at the airport, including the Landing and Take Off and Climb Cruise Descent phases of flight.
- **Construction:** The emissions arising from the extraction, processing and manufacture of construction materials; transportation of these materials; the energy and water used during construction processes; transport and disposal of waste; and transport of construction workers.

4.8.5 To achieve those outcomes, GAL will draw from a range of measures which reflect current best practice and technologies available, as well as facilitating emerging technologies as carbon reduction techniques continue to evolve.

4.8.6 GAL commitments that affect target surface access emissions are set out in **ES Appendix 5.4.1 Surface Access Commitments** (Doc Ref. 5.3) which are also secured by the DCO.

5 The Development Consent Order Application

5.1 Introduction

5.1.1 This section provides an overview of the DCO application including the **draft DCO** (Doc Ref. 2.1). It sets out the permissions and powers which would be provided to construct and operate the Project. This section also explains the development flexibility which is being sought by the draft DCO and the approach to environmental mitigation and management.

5.2 An Overview of the Draft DCO

5.2.1 Section 31 of the Planning Act 2008 provides that a DCO is required to the extent that a development is, or forms part of, a NSIP. The Project is an NSIP under Sections 22 (highways) and 23 (airports) of the Act.

5.2.2 Development consent for the Project would be granted in the form of a DCO. The **draft DCO** (Doc Ref. 2.1) authorises GAL to undertake works to construct the Project and carry out associated works. It would also permit GAL to acquire, compulsorily or by agreement, land and rights in land. The **draft DCO** (Doc Ref. 2.1) also includes provisions in connection with the maintenance and operation of the Project.

5.2.3 The **draft DCO** (Doc Ref. 2.1) includes a total of 12 Schedules. Schedule 1 (Authorised Development) sets out the details of the Project including individual work packages with reference to the **Works Plans** (Doc Ref. 4.5).

5.2.4 Schedule 2 sets out the requirements that would apply to the construction, operation and maintenance of the Project. Schedules 3 to 6 relate to the proposed highway works, including streets and public rights of way to be stopped-up. Schedules 7 and 8 relate to the acquisition, compensation and compulsory purchase of land. Schedule 9 relates to the protective provisions for utilities undertakers (electricity, gas, water, sewage and electronic communications) and National Highways. Schedule 10 relates to Special Category Land to be permanently acquired and for which replacement land is provided, as well as Special Category Land over which rights will be acquired. Schedule 11 sets out the procedures for approvals, consents and appeals. Finally, Schedule 12 provides the details of documents to be certified.

5.2.5 The **Explanatory Memorandum to the draft DCO** (Doc Ref. 2.2) summarises all Articles and Schedules in the **draft DCO** (Doc Ref. 2.1) and provides further details of the purpose and effect of each provision within the **draft DCO** (Doc Ref. 2.1).

5.3 Powers Included within the Draft DCO

5.3.1 The draft DCO would, if confirmed, grant development consent for the 'authorised development' as defined in Schedule 1 of the **draft DCO** (i.e. the Project). The 'authorised development' is described in detail in Section 4 of this Statement and in **ES Chapter 5: Project Description** (Doc Ref. 5.1).

5.3.2 All of the authorised development falls within the definition of a 'highway' or an 'airport' for the purposes of Sections 22 and 23 of the Planning Act 2008 or meets the definition of 'associated development'.

5.3.3 The ‘authorised development’ comprises the following principal elements:

- alterations to the existing northern runway, including repositioning its centreline 12 metres further north to enable dual runway operations;
- reconfiguration of taxiways;
- pier and stand amendments (including a proposed new pier);
- reconfiguration of existing airfield facilities;
- extensions to the North and South Terminals;
- provision of additional hotels and commercial space;
- provision of reconfigured car parking, including new surface and multi-storey car parks;
- surface access (highway) improvements;
- reconfiguration of existing utilities, including surface water, foul drainage and power; and
- landscape/ecological planting and environmental mitigation.

5.3.4 The principal powers are set out in Part 2 of the **draft DCO** (Doc Ref. 2.1) and include:

- provisions relating to the maintenance of the development;
- provisions relating to the maintenance of drainage works;
- limits of deviation; and
- provisions specifying who may take the benefit of the development consent and the process for doing so; and
- provisions regarding the interaction between other planning permissions and the authorised development.

5.3.5 Part 3 of the **draft DCO** (Doc Ref. 2.1) provides details of the procedures applicable to street works including powers to alter layouts, stopping-up and temporary closures; public rights of way (creation, diversion and stopping-up); access to works; road classifications and traffic regulations. This Part also includes provisions regarding the construction and maintenance of local highways, including regarding agreements with highway authorities. Schedules 3 to 6 provide further relevant details:

- highways and private means of access to be permanently stopped up and their replacements (Schedule 3);
- public rights of way, footways and cycle tracks to be stopped up (Schedule 4);
- classification of roads (Schedule 5); and
- traffic regulations (Schedule 6).

5.3.6 The **draft DCO** (Doc Ref. 2.1) also contains several supplemental and ancillary matters, i.e. provisions not consisting of development including powers necessary to construct, operate and maintain the Project.

5.3.7 Part 4 of the **draft DCO** (Doc Ref. 2.1) includes supplemental provisions relating to:

- the discharge of water;
- protective work to buildings;
- authority to survey and investigate land;
- felling and lopping of trees and the removal of hedgerows; and
- removal of human remains.

5.3.8 Protective provisions for utility undertakers and operators of electronic communications code networks, as well as National Highways, are included in Schedule 9.

5.3.9 The main ancillary matter is a power to acquire land or rights over land compulsorily or by agreement, required for the authorised development, or to facilitate it, or that are incidental to the authorised development (Part 5 of the **draft DCO** Doc Ref. 2.1). A justification for these powers is set out in the **Statement of Reasons** (Doc Ref. 3.2).

5.3.10 Schedules 7, 8 and 10 provide the details relating to specified land and procedures:

- land in which only new rights etc. may be acquired (Schedule 8);
- modification of compensation and compulsory purchase enactments (Schedule 9); and
- special category land (Schedule 10).

5.3.11 The **Explanatory Memorandum to the draft DCO** (Doc Ref. 2.2) provides a fuller description of the powers included within the draft DCO.

5.4 Plans Submitted with the DCO Application

5.4.1 The **draft DCO** is accompanied by set of plans for approval which provide details of the proposals. The plans include:

- **Land Plans** (Doc Ref. 4.2)
- **Crown Land Plans** (Doc Ref. 4.3)
- **Special Category Land Plans** (Doc Ref. 4.4)
- **Works Plans** (Doc Ref. 4.5)
- **Rights of Way and Access Plans** (Doc Ref. 4.6)
- **Parameter Plans** (Doc Ref. 4.7)
- **Surface Access Highways Plans – General Arrangements** (Doc Ref. 4.8.1)
- **Surface Access Highways Plans – Engineering Section Drawings** (Doc Ref. 4.8.2)
- **Surface Access Highways Plans – Structure Section Drawings** (Doc Ref. 4.8.3)
- **Traffic Regulation Plans – Speed Limits** (Doc Ref. 4.9.1)
- **Traffic Regulation Plans – Classification of Roads** (Doc Ref. 4.9.2)
- **Traffic Regulation Plans – Clearways and Prohibitions** (Doc Ref. 4.9.3)

5.4.2 Each of the main components of the authorised development is attributed a work number ('Work No.'). The work numbers should be read alongside the **Work Plans** (Doc Ref. 4.5) which are set out at Schedule 1 of the **draft DCO** (Doc Ref. 2.1) and define the location of the authorised development as well as any limits of deviation.

5.4.3 The main components of the Project and corresponding Work Nos. are set out in Table 5.1.

Table 5.1: Scheme Components and corresponding Work Numbers

Main Component	Work No.
Airfield	Work Nos. 1 to 7
Reconfiguration of Existing Airport Facilities	Works Nos. 8 to 34
Surface Access Works	Works Nos. 35, 36 and 37
Miscellaneous	Works Nos. 38 to 43

5.4.4 The **Work Plans** (Doc Ref 4.5) adopt an approach to flexibility that reflects the specific proposals, their nature, scale and timescales for delivery (see Section 5.5 below for further details).

5.4.5 Schedule 1 of the **draft DCO** (Doc Ref. 2.1) also includes a provision which sets out a number of minor works that are common to a number of work packages, under the heading 'Miscellaneous and General' (see Part 7). These include works such as landscaping, water management, habitat creation, establishment of construction compounds, vegetation clearance, works to trees, shrubs and hedges and utilities.

5.5 Securing Mitigation

The Draft DCO

5.5.1 The **draft DCO** (Doc Ref. 2.1) secures the extent of the consent and what development can be carried out and grants the powers which are necessary to deliver the Project. It describes the processes which must be followed and conditions for activities being carried out or powers being used.

5.5.2 Schedule 2 of the **draft DCO** (Doc Ref. 2.1) sets out the requirements that are necessary to control the construction, operation and maintenance of the Project. The requirements reflect the mitigation set out in the **ES** (Doc Ref. 5.1-5.3) and ensure that the mitigation relied upon for the conclusions of the Environmental Impact Assessment is secured.

Section 106 Agreement

5.5.3 A Section 106 Agreement was first entered into between GAL, WSCC and CBC in 2001 and subsequently has been extended every 3 or 4 years. The current Section 106 Agreement was signed and executed on 24th May 2022 and expires on 31st December 2024.

5.5.4 The obligations in the previous and existing Section 106 Agreements have been used to manage and mitigate the operational aspects of the airport and airport-related development on the environment, whilst ensuring the airport makes a positive contribution to the local economy and the quality of life for those living within the Gatwick Diamond area.

5.5.5 Following the expiry of the existing Section 106 Agreement, it is proposed that the following new agreements will be required:

- an extension to the existing Section 106 Agreement ('the extended Section 106 Agreement') to operate from 1st January 2025 until such time that the development of the Project pursuant to the DCO is commenced; and then
- a new Section 106 Agreement in respect of the NRP ('the NRP Section 106 Agreement') that would replace any existing Section 106 Agreement between the parties at the point the NRP DCO was commenced.

5.5.6 In respect of the extended Section 106 Agreement, it is proposed that this maintains the obligations under the existing Section 106 Agreement (May 2022) with additional and amended requirements, such as:

- new dates for any reporting requirements based on the extended period for the Section 106 Agreement (e.g. reporting on climate initiatives, surface access, community initiatives and general reporting on GAL's obligations); and

- new durations for funding arrangements (e.g. air quality financial support, surface access, community initiatives including the Sustainable Transport Fund, Community Fund and the Gatwick Greenspace Partnership).

5.5.7 The draft Heads of Terms for the new NRP Section 106 Agreement sets out the planning obligations which are not considered appropriate to be secured as requirements to the DCO, for instance monetary obligations which will either require GAL to provide a financial contribution towards the provision of mitigation or to secure the provision of certain services or works. GAL will consider how the extended S106 Agreement obligations interact with those proposed to be secured through the NRP S106 Agreement and the DCO Requirements and associated control documents, which will be discussed with the local authorities through the SoCG process.

5.5.8 Table 5.2 sets out GAL's initial, proposed approach to the Heads of Terms for the Project under a new NRP Section 106 Agreement and the requirements to be secured within the DCO.

Table 5.2 : Proposed Heads of Terms for the new Section 106 Agreement and requirements in the draft DCO

Topic	To be secured by the NRP Section 106 Agreement	To be secured by a DCO Requirement
Project Works	None	▪ The Authorised Development and Limits of Deviation.
Historic Environment	None	▪ Compliance with the measures included within the **Code of Construction Practice** (CoCP) (Doc Ref. 5.3), including measures to avoid light spill, preparation of vegetation removal plans and micro-siting of compounds to have regard to archaeological sensitivities. ▪ Compliance with the **Written Schemes of Investigation** (Doc Ref. 5.3), which set out the process for examining and recording archaeological remains ahead of and during construction. ▪ Compliance with the measures included within the **Outline Landscape and Ecology Management Plan** (Doc Ref.5.3), including careful design of environmental mitigation to have regard to the presence of buried archaeological remains, additional planting and the extension of a footpath to

		provide access to land within and adjacent to the Church Road (Horley) Conservation Area. ▪ Compliance with the **Noise Envelope (ES Appendix 14.9.7)** (Doc Ref. 5.3), which set noise limits, and associated reporting requirements. ▪ Compliance with the Design Principles detailed in the **Design and Access Statement** (Doc Ref. 7.3), including measures relating to the management of operational lighting.
Landscape and Visual	None	▪ Compliance with the **Code of Construction Practice** (CoCP) (Doc Ref.5.3), including the preparation of a vegetation retention strategy and specification of lighting management measures (construction and operation) to minimise impacts on biodiversity, local residents and users of public rights of way and open space ▪ Compliance with the measures included within the **Outline Landscape and Ecology Management Plan** (Doc Ref. 5.3), including the provision of approximately 1.95ha of replacement public open space and the preparation of landscape and ecology management plans. ▪ Compliance with the Design Principles detailed in the **Design and Access Statement** (Doc Ref. 7.3), including specification of lighting management measures to minimise impacts on biodiversity, local residents and users of public rights of way and open space.
Ecology and Nature Recovery	None	▪ Compliance with the **Written Schemes of Investigation** (Doc Ref. 5.3), which sets out a requirement potential impacts on ecology and nature conservation to be assessed and mitigated prior to those works starting. ▪ Compliance with the measures included within the **Code of Construction Practice** (CoCP) (Doc Ref. 5.3), including the undertaking of pre-construction surveys, the creation of buffer zones around receptors, creation of receptors sites for the

		translocation of species, the completion of method statements and pre-construction surveys to reduce the likelihood of effects on species and implementation of measures for the appropriate storage of fuel. ▪ Compliance with the measures included within the **Outline Landscape and Ecology Management Plan** (Doc Ref. 5.3), including landscape planting schemes and retention of existing vegetation where possible, and the creation of an attenuation pond supporting reedbed and other areas and linkages to create a high value habitats. ▪ Compliance with the Design Principles detailed in the **Design and Access Statement** (Doc Ref. 7.3), including the retention of features of ecological value where possible.
Geology and Ground Conditions	None	▪ Compliance with the **Code of Construction Practice** (CoCP) and its associated plans (e.g. the Water Management Plan) (Doc Ref. 5.3), including the preparation of discovery strategies and measures for dealing with unexploded ordinances and remediation, and implementation of measures to protect groundwater and worker health and safety. ▪ Preparation of and compliance with a Remediation Strategy and Verification Report (where necessary) to set out the approach and thereafter demonstrate compliance with the strategy.
Water Environment	None	▪ Compliance with the measures included within the **Code of Construction Practice** (CoCP) and its associated plans (e.g. the Water Management Plan) (Doc Ref. 5.3), including, the construction of suitable drainage systems during the construction period, the use of specific construction measures for works to the River Mole, and ground and surface water monitoring ▪ Provision of compensatory flood storage areas, via a Flood Compensation Delivery Plan. ▪ Compliance with the Design Principles detailed in the **Design and Access**

		Statement (Doc Ref. 7.3), including the delivery of Flood Compensation Areas and additional attenuation storage, and appropriate design of the Active Travel Path and Burstow Stream Tributary culvert design and a new weir on the southern entrance to the River Mole runway culvert. ▪ Compliance with the measures included within the **Outline Landscape and Ecology Management Plan** (Doc Ref. 5.3), including the delivery of flood compensation areas, increases to the capacity of the River Mole floodplain channel area and realignment and renaturalisation of the River Mole. ▪ Compliance with the **Surface Access Highways Surface Water Drainage Strategy**, (Annex 2 of **ES Appendix 11.9.6: Flood Risk Assessment**) (Doc Ref. 5.3) including control arrangements to limit discharges to watercourses.
Traffic and Transport	▪ Funding for parking controls. ▪ A Sustainable Transport Fund to support measures to achieve the mode share commitments. ▪ A Transport Mitigation Fund to deliver the relevant Surface Access Commitments.	▪ Surface access improvements through highway and active travel measures. ▪ Compliance with the **Public Rights of Way Strategy** (Doc Ref. 5.3), including implementation of measures including management measures and temporary diversions to specific routes. ▪ Compliance with the **Outline Construction Traffic Management Plan** (Doc Ref. 5.3), including measures to control the timing and routing of construction traffic. ▪ Compliance with the **Outline Construction Workers Travel Plan** (Doc Ref. 5.3), including measures to encourage and incentive the use of public transport by construction personnel. ▪ Compliance with the **Surface Access Commitments** (Doc Ref. 5.3), including measuring relating to mode share commitments, support for public transport usage, parking controls and monitoring and reporting measures. Monitoring and reporting will be issued annually to the Gatwick Airport Transport Forum Steering Group for information.
Air Quality	▪ A commitment to the continuation of	▪ Compliance with the measures included within the **Code of Construction Practice**

	monitoring of air quality at three permanent sites to be run jointly with the local authorities in addition to the site at Gatwick Airport; and further new monitoring locations on the airport site and external to the airport once the Project is operational. ▪ Air quality studies - Participating in national aviation industry body studies of UFP emissions at airports and studying indoor air quality monitoring including those reviewing how monitoring could be undertaken.	(CoCP) (Doc Ref. 5.3), including dust and odour management measures and monitoring and reporting. ▪ Compliance with the **Outline Construction Traffic Management Plan** (Doc Ref. 5.3), including the use of low emissions plant where practicable and measures to control the timing and routing of construction traffic. ▪ Compliance with the **Outline Construction Workers Travel Plan** (Doc Ref. 5.3), including measures to control the timing and routing of construction traffic. ▪ Compliance with the **Surface Access Commitments** (Doc Ref. 5.3), including measuring relating to mode share commitments, support for public transport usage, parking controls and monitoring and reporting measures. ▪ Compliance with emission reduction commitments under the **Carbon Action Plan** (Doc Ref. 5.3)
Noise	▪ Air noise management performance reporting, including reporting to the Noise Management Board. ▪ Engagement with relevant specified stakeholders, including GATCOM, LPAs, ICCAN and Government bodies.	▪ Compliance with the measures included within the **Code of Construction Practice** (CoCP) (Doc Ref. 5.3), including controls over working hours and a commitment to construction noise monitoring. ▪ Compliance with the Design Principles detailed in the **Design and Access Statement** (Doc Ref. 7.3), including the creation of a western noise barrier and design of plant and fixed noise sources on buildings to meet the stated noise criteria. ▪ Compliance with the measures included within the **Outline Landscape and Ecology Management Plan** (Doc Ref. 5.3), including the design of the landscape bund to provide additional ground noise screening. ▪ Provision of a Noise Insultation Scheme for qualifying buildings during construction as described in the **CoCP**. ▪ Provision of a **Noise Insultation Scheme (ES Appendix 14.9.10)** (Doc Ref. 5.3), including provision of a Homeowners

		Assisted Moving Scheme, for qualifying buildings during operation. ▪ Compliance with the **Noise Envelope (ES Appendix 14.9.7)** (Doc Ref. 5.3) which set noise limits and associated reporting requirements.
Climate and Climate Change	None	▪ Compliance with the measures included within the **Code of Construction Practice** (CoCP) (Doc Ref. 5.3), including compliance with of measures in the event of adverse weather and adoption of various construction management measures. ▪ Provision of a Noise Insultation Scheme for qualifying buildings during construction as described in the **CoCP**. ▪ Provision of a **Noise Insultation Scheme (ES Appendix 14.9.10)** (Doc Ref. 5.3) for qualifying buildings during operation. ▪ Compliance with the measures included within the **Outline Landscape and Ecology Management Plan** (Doc Ref. 5.3), including the creation of new high value habitats, realignment of the River Mole and provision of replacement open space ▪ Provision of compensatory flood storage areas via a Flood Compensation Delivery Plan. ▪ Compliance with the Design Principles detailed in the **Design and Access Statement** (Doc Ref. 7.3), including the provision of additional surface water attenuation and additional water infrastructure, and consideration of climate change measures in design. ▪ Compliance with the **Surface Access Highways Surface Water Drainage Strategy**, (Annex 2 of **ES Appendix 11.9.6: Flood Risk Assessment**) (Doc Ref. 5.3) including control arrangements to limit discharges to watercourses. ▪ Compliance with the **Public Rights of Way Strategy** (Doc Ref. 5.3), including implementation of measures including management measures and temporary diversions to specific routes.

		▪ Compliance with the **Surface Access Commitments** (Doc Ref. 5.3), including in relation to mode share targets that will increase the proportion of travel to and from the airport made by sustainable modes.
Greenhouse Gases	None	▪ Compliance with the **Surface Access Commitments** (Doc Ref. 5.3), including in relation to mode share targets that will increase the proportion of travel to and from the airport made by sustainable modes. ▪ Compliance with emission reduction commitments under the **Carbon Action Plan** (Doc Ref. 5.3).
Socio-economics and the Community	▪ Adoption of an Employment, Skills and Business Strategy (ESBS) to maximise the economic benefits of the Project for communities and businesses.	▪ Compliance with the measures included within the **Code of Construction Practice** (CoCP) and its associated plans (Doc Ref. 5.3), including provision of welfare facilities for construction personnel and to reduce impacts on local communities and local facilities. ▪ Compliance with the **Outline Construction Traffic Management Plan** (Doc Ref. 5.3), including scheduling of movements to arrive and depart outside of peak periods. ▪ Compliance with the **Outline Construction Traffic Management Plan** (Doc Ref. 5.3), including to encourage/incentive public transport use by construction personnel. ▪ Compliance with the measures included within the **Outline Landscape and Ecology Management Plan** (Doc Ref. 5.3), including the provision of replacement open space.
Health and Wellbeing	▪ Healthcare for airport passengers and visitors provided via trained first aiders and first responders. ▪ Adoption of an Employment, Skills and Business Strategy (ESBS), promoting health	▪ Compliance with the measures included within the **Code of Construction Practice** (CoCP) (Doc Ref. 5.3), including the provision of welfare facilities for construction personnel, and implementation of a protocol setting out the approach for health queries from construction personnel. ▪ Provision of a Noise Insultation Scheme for qualifying buildings during operation, with targeted support to promote uptake by vulnerable groups within the scheme area . ▪ Provision of a **Noise Insultation Scheme**

	inequality through benefits to local vulnerable groups and monitoring benefits to local groups. ▪ Community Fund, which could be used to provide discretionary support for any vulnerable groups experiencing in-combination effects. ▪ Ambulance call out rate monitoring data to be shared with GATCOM.	**(ES Appendix 14.9.10)** (Doc Ref. 5.3) for qualifying buildings during operation, with targeted support to promote uptake by vulnerable groups within the scheme area.
Agricultural Land Use and Recreation	None	▪ Compliance with the measures included within the **Code of Construction Practice** (CoCP) (Doc Ref. 5.3), including the preparation of soil management plans and implementation of measures to reduce, as far as practicable, the effects of construction activities on farm holdings. ▪ Compliance with the **Public Rights of Way Management Strategy** (Doc Ref. 5.3), including the permanent diversion of Footpath 367 and a permanent diversion and stopping up of the Sussex Border Path (Footpath 346). ▪ Compliance with the measures included within the **Outline Landscape and Ecology Management Plan** (Doc Ref. 5.3), including the provision of replacement open space, the creation of an additional pedestrian route and the provision of new recreational routes around the proposed flood compensation area to the east of Museum Field. ▪ Compliance with the Design Principles detailed in the **Design and Access Statement** (Doc Ref. 7.3), including the creation of additional pedestrian route linking Riverside Garden Park into the replacement open space in Car Park B,

		linking with the Sussex Border Path to the north of the A23.
General Engagement	▪ Regular specified engagement through the Gatwick Joint Local Authorities meetings and Gatwick Officers Group. ▪ Funding support for the Gatwick Greenspace Partnership. ▪ Funding support via the Gatwick Community Fund.	▪ Compliance with the measures included within the **Code of Construction Practice (CoCP)** (Doc Ref. 5.3), including engagement processes to keep the local community up to date

Other Consents and Licences

5.5.9 Additionally, some mitigation will be secured through other regulatory regimes which need to be complied with. For example, protected species licences and environmental permits will be required before certain activities can be carried out and will be applied for separately, outside of the DCO application. A **List of Other Consents and Licences** (Doc Ref. 7.5) is submitted as part of the application for a DCO. These include protected species licences, permits for water, waste and noise activities and health and safety notifications.

Mitigation Route Map

5.5.10 A **Mitigation Route Map** (Doc Ref. 5.3) provided as **Appendix 5.2.3** in **ES Chapter 5: Project Description** has been submitted with the DCO application. It has been prepared to demonstrate that all necessary controls, mitigation and enhancements have been identified and secured. This document is submitted for information only. The Mitigation Route Map:

- provides an audit trail of the controls, mitigation and enhancement measures on which the ES relies to avoid, reduce and if possible offset significant impacts of the development; and
- sets out the way in which they have been translated into clear and enforceable controls; either via requirements in the DCO, Section 106 obligations or other consent regimes.

5.5.11 In some areas, the appropriate mitigation and enhancement measures have been 'designed-in' to the Project. As such, when the 'assessment of effects' has been carried out, it has been done so on the basis that many measures are already built-in. Measures that can be assumed to be part of the Project include normal good practice guidance documents (e.g. for the control of dust, noise and pollution). Other measures that are adopted include implementation of the Carbon Action Plan, Surface Access Commitments, Noise Insulation

Scheme and biodiversity enhancements.

Control Documents and Subsequent Approvals

5.5.12 Provided the application for a DCO is granted, there would be details and elements of the Project that will still require subsequent approvals.

5.5.13 The DCO requirements as specified in Schedule 2 of the **draft DCO** (Doc Ref. 2.1) identify different discharging authorities depending on the works and the nature of the requirement. The approving authority for the detailed design of the authorised development varies depending on the nature of the works in question. Said approval in respect of local highway works is sought from the relevant highway authority and, in respect of national highway works, from National Highways. Otherwise, detailed design approval is sought from the relevant planning authority.

5.5.14 The DCO makes special provision for works which form part of the authorised development but which GAL would otherwise have been able to undertake pursuant to its permitted development rights in Schedule 2, Part 8, Class F of the Town and Country Planning (General Permitted Development) (England) Order 2015 (the "**GPDO**"). These works, defined in the DCO as 'excepted development', are exempted from the standard detailed design requirements and are instead made subject to controls which mirror those in the GPDO, namely that the works may only be carried out following consultation with the relevant planning authority.

5.5.15 Article 54 (procedure in relation to certain approvals etc.) of the **draft DCO** (Doc Ref. 2.1) gives effect to Schedule 11 (Procedure for Approvals, Consents and Appeals) which sets out the procedure to be followed in relation to applications made to a discharging authority for any approval or agreement required by a requirement in the Order. This schedule sets out the procedures that apply to any approvals, consents and appeals under the requirements in Schedule 2 and various approvals and consents under the DCO. It also provides for the payment of fees in respect of the discharge of requirements.

5.5.16 The two main control documents are the **draft DCO** (Doc Ref. 2.1) and the Section 106 Agreement. The **Mitigation Route Map** provided as **Appendix 5.2.3** to **ES Chapter 5: Project Description** (Doc Ref. 5.3) sets out the proposed approach for using planning control documents to direct the subsequent approvals. A table of control documents is provided below in Table 5.3. There are three levels of control documents:

- **Level 1 : Control Documents (Strategies and Plans Secured by the DCO and NRP Section 106 Agreement)**

  The Level 1 Control Documents are secured by either the DCO or the NRP Section 106 Agreement. They set out the controls required over the Project to ensure that the works are implemented within the limits of the environmental impact assessment (EIA). Some Level 1 Control Documents specify all measures assumed and needed by the EIA and do not require Level 2 documents; works must be carried out in accordance with these documents.

- **Level 2 : Subsequent Approvals (submitted after the DCO is made/on specific triggers in the NRP Section 106 Agreement)**

  On a project of this scale and complexity, it is not always possible for the Level 1 control documents to include the detail necessary to ensure that the correct practices and limits are applied in every context. Therefore, where appropriate, Level 2 documents will be produced for a further approval. In most cases the Level 2 documents submitted for approval will be in general accordance with the relevant Level 1 document. In their approval of Level 2 documents, the relevant discharging authority will consider compliance with the Level 1 control documents and whether any deviations are appropriate.

- **Level 3 : Implementation Documents**

  GAL will require its contractors to prepare detailed construction plans. These plans will demonstrate to GAL how the specific works will be carried out in accordance with all relevant legislation and guidance; including the relevant Level 1 and Level 2 documents. For example, documents that demonstrate how elements of the **CoCP** (Doc Ref. 5.3) will be complied with.

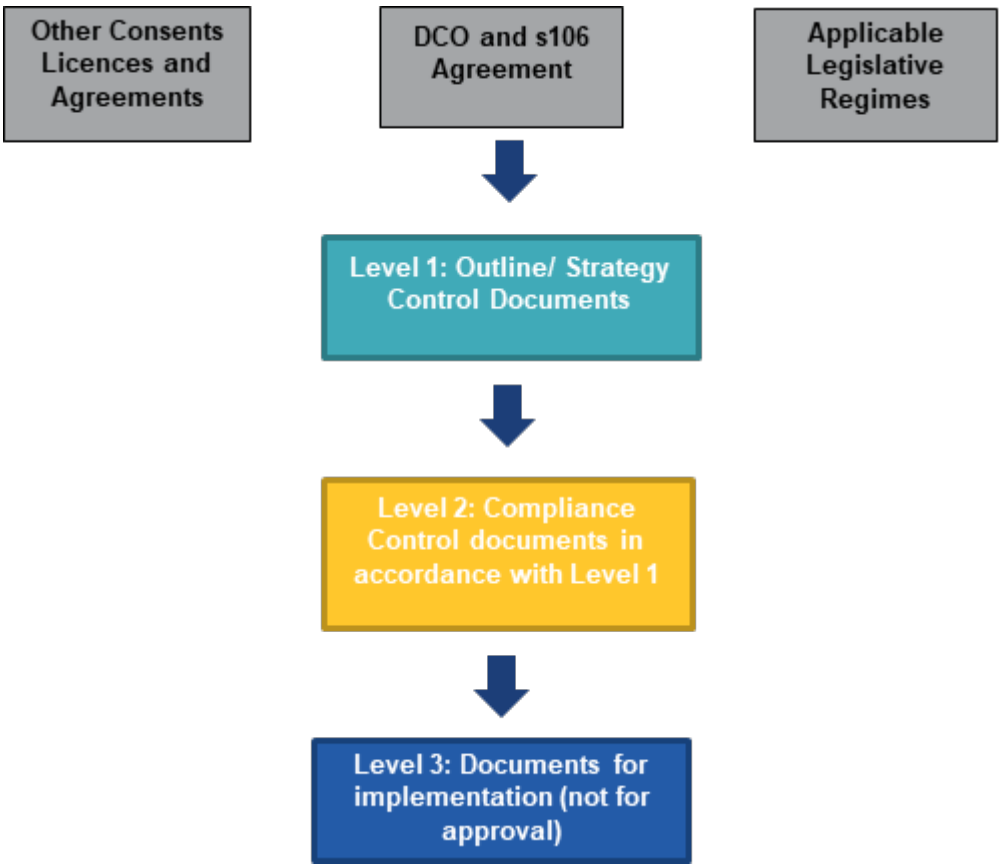
Table 5.3: Control Documents

Control Document	Location in the Application
Code of Construction Practice (CoCP)	**ES Appendix 5.3.2: Code of Construction Practice** (Doc Ref. 5.3)
Water Management Plan (WMP)	**ES Appendix 5.3.2: CoCP Annex 1 – Water Management Plan** (Doc Ref. 5.3)
Outline Construction Workforce Travel Plan (oCWTP)	**ES Appendix 5.3.2: CoCP Annex 2 – Outline Construction Workforce Travel Plan** (Doc Ref 5.3)
Outline Construction Traffic Management Plan (oCTMP)	**ES Appendix 5.3.2: CoCP Annex 3 – Outline Construction Traffic Management Plan** (Doc Ref. 5.3)
Soil Management Strategy (SMS)	**ES Appendix 5.3.2: CoCP Annex 4 – Soil Management Strategy** (Doc Ref. 5.3)
Construction Resources and Waste Management Plan (CRWMP)	**ES Appendix 5.3.2: CoCP Annex 5 – Construction Resources and Waste Management Plan** (Doc Ref. 5.3)
Design Principles	Appendix A1 of the **Design and Access Statement** (Doc Ref. 7.3)
Outline Landscape and Ecology Management Plan (including the Ecology Strategy) (oLEMP)	**ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan** (Doc Ref. 5.3)
Noise Envelope	**ES Appendix 14.9.7: The Noise Envelope** (Doc Ref. 5.3)
Carbon Action Plan (CAP)	**ES Appendix 5.4.2: Carbon Action Plan** (Doc Ref. 5.3)
Surface Access Commitments (SAC)	**ES Appendix 5.4.1: Surface Access Commitments** (Doc Ref. 5.3)

Public Rights of Way Management Strategy (PRoW)	**ES Appendix 19.8.2: Public Rights of Way Management Strategy** (Doc Ref. 5.3)
Written Scheme of Investigation for Surrey (WSI for Surrey)	**ES Appendix 7.8.1: Written Scheme of Investigation for post-consent Archaeological Investigations – Surrey** (Doc Ref. 5.3)
Written Scheme of Investigation for West Sussex (WSI for West Sussex)	**ES Appendix 7.8.2: Written Scheme of Investigation for post-consent Archaeological Investigations and Historic Building Recording – West Sussex** (Doc Ref. 5.3)
Employment, Skills and Business Strategy (ESBS)	**ES Appendix 17.8.1: Employment, Skills and Business Strategy** (Doc Ref. 5.3)
Surface Access Highways Surface Water Drainage Strategy	**ES Appendix 11.9.6: Flood Risk Assessment – Annex 2** (Doc Ref. 5.3)
Noise Insulation Scheme (NIS)	**ES Appendix 14.9.10: Noise Insulation Scheme** (Doc Ref. 5.3)
Flood Resilience Statement	**ES Appendix 11.9.6: Flood Risk Assessment – Annex 6** (Doc Ref. 5.3)
Land Plans - For Approval	Doc Ref. 4.2
Crown Land Plans - For Approval	Doc Ref. 4.3
Special Category Land Plans - For Approval	Doc Ref. 4.4
Works Plans - For Approval	Doc Ref. 4.5
Rights of Way and Access Plans - For Approval	Doc Ref. 4.6
Parameter Plans - For Approval	Doc Ref. 4.7
Surface Access Highways Plans – General Arrangements - For Approval	Doc Ref. 4.8.1
Surface Access Highways Plans – Engineering Section Drawings - For Approval	Doc Ref. 4.8.2
Surface Access Highways Plans – Structure Section Drawings - For Approval	Doc Ref. 4.8.3
Traffic Regulation Plans – Speed Limits - For Approval	Doc Ref. 4.9.1
Traffic Regulation Plans – Classification of Roads - For Approval	Doc Ref. 4.9.2
Traffic Regulation Plans – Clearways and Prohibitions - For Approval	Doc Ref. 4.9.3

5.5.17 Figure 5.1 sets the planning control documents in the context of other controls/commitments and demonstrates how the different levels of documents relate to each other:

Figure 5.1: Structure of Controls on GAL



Monitoring, Reporting and Governance

5.5.18 Through the Level 1 and Level 2 documents, GAL has or will set out detailed monitoring and reporting regimes where considered necessary. Those monitoring regimes have been (or will be) carefully designed to ensure that data is captured on sensitive receptors and identified areas of harm. They will provide appropriate oversight of the implementation of the Project for the discharging authority and other relevant statutory bodies to review the effectiveness of mitigation and have regard to remedies that would be agreed with and implemented by GAL.

5.6 Flexibility in the draft DCO

5.6.1 Large scale infrastructure projects often require an element of flexibility set within clearly defined parameters. Such parameters can set defined envelopes within which the development can take place, including maximum and minimum building heights and the position of buildings and other structures. Given the complexity of the Project including its lengthy design process, the Project will require refinement over time during implementation. This process extends beyond the process relating to the granting of the DCO.

5.6.2 The Project contains some works which include parameters and limits of deviation which allow designs to be assessed on a reasonable worst-case basis considering the potential

scale, function and construction and operational resource requirements.

5.6.3 To retain necessary flexibility in the final design, maximum parameters for height and extent have been defined and used in the assessment of environmental effects to ensure a reasonable worst-case has been assessed. The use of parameters in environmental impact assessment is an accepted approach and is further described in **ES Chapter 6**:**Approach to Assessment** (Doc Ref. 5.1).

5.6.4 Article 6 in Part 2 of the **draft DCO** (Doc Ref. 2.1) requires that each numbered work must be situated within the limits of the corresponding numbered area shown on the **Works Plans** (Doc Ref. 4.5). Article 6 goes on to set out where there are further restrictions on the delivery of particular works within the associated work limits. The vertical and lateral limits within which certain components of the authorised development may be constructed are also specified within this Article.

5.6.5 In respect of the highway works (Work Nos. 35, 36 and 37) as shown on the **Surface Access Highways Plans – General Arrangements** (Doc Ref. 4.8.1), vertical deviation is permitted to a maximum of 1.5m upwards and to a maximum of 2m downwards and to deviate laterally to the extent of the limits shown on these plans.

5.6.6 In constructing the buildings in Work Nos. 3, 6, 9, 10, 11, 12, 15, 16, 22, 23, 26, 27, 28, 29, 30 and 31, the development will not be permitted to deviate vertically from the levels shown on the **Parameter Plans** (Doc Ref. 4.7) as controlled by Article 6 in the **draft DCO** (Doc Ref. 2.1).

5.6.7 The purpose of this provision is to provide GAL with a proportionate degree of flexibility when constructing the scheme, reducing the risk that the scheme as approved cannot later be implemented for unforeseen reasons but at the same time ensuring that any flexibility will not give rise to any materially new or different environmental effects.

6 Policy Context

6.1 Introduction

6.1.1 This section provides an overview of the planning, aviation and networks policy relevant to the application and also identifies which other documents may be important or relevant to the SoS's decision (as required by Sections 104 and 105 of The Act).

6.1.2 Section 3 of this Planning Statement and Section 3 of the **Needs Case** (Doc Ref. 7.2) demonstrate the strength of national policy support for new aviation capacity.

6.1.3 The Planning Act 2008 does not incorporate Section 38(6) of the Planning and Compulsory Purchase Act 2004, which provides the principal basis in law for the determination of planning applications; namely that they must be determined in accordance with the Development Plan unless material considerations indicate to the contrary. The Local Development Plan is not the starting point for the consideration of a DCO but it can be important and relevant.

6.1.4 National aviation policy provides the primary policy framework for the determination of aviation NSIPs. The National Planning Policy Framework (NPPF) confirms (at paragraph 5) that it does not provide policies for NSIPs and local plans prepared in accordance with the NPPF do not do so either. As the Government policy document *Beyond the Horizon - The Future of UK Aviation – making best use of existing runways*, *June 2018*)[40] explains from paragraph 1.11, local authorities have an important role to play in local issues but "*there are, however, some important environmental elements which should be considered at a national level.*"

6.1.5 Seen in that context, it is appropriate to record that the Crawley Local Plan, 2015 "*has been prepared on the basis of supporting the growth of Gatwick Airport to a throughput of 45 million passengers per annum within its current configuration of a single runway and two terminals*" (paragraph 1.37) and recognises that any decision about the significant growth of the airport (such as a second runway) would be a matter for government policy (paragraphs 1.38 and 9.5). Local planning policies should be seen in this context.

6.1.6 In this section, the relevant national aviation policy and national and local planning policy, which may be both important and relevant to the determination of the application for development consent, is identified and issues of planning principle are addressed. Many policy issues, however, relate to specific land use or environmental topics and these matters are addressed systematically in Sections 7 and 8 of this Planning Statement. Both the ANPS and the NNNPS set out detailed policies to enable the consideration of applications for NSIPs. Those policies are provided topic by topic and have been assessed in this Planning Statement including within the Planning Policy Compliance Tables provided as **Appendix C.** Whilst the policy wording varies for some topics, the principles and objectives of the policies are aligned.

[40] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/714069/making-best-use-of-existing-runways.pdf

6.1.7 Whilst formal determination of the highways element of the proposals must take place against the requirements of Section 104 of the Act, it is appropriate to use the policy framework of the ANPS as the primary framework against which the Project as a whole should be tested.

6.1.8 This section also considers the effect of policies in the NNNPS.

6.2 National Aviation Policy

6.2.1 The Government has always consistently recognised that commercial aviation is fundamental to the growth and prosperity of the UK and that it remains of huge strategic importance to the country, particularly post-Brexit, to connect the UK to the world and allow tourism, business and trade to thrive.

6.2.2 In May 2022, the Government issued its strategic framework for aviation over the next ten years - *Flightpath to the Future*[41]. It states that now is the right time for UK aviation to look to the future and that it will work hand-in-hand with the industry to help it grow and return to pre-pandemic levels of demand and profitability. That means supporting airport expansion where it's justified, to boost global connectivity and level up the UK. The framework provided by *Flightpath to the Future* is examined further below. However, it is one of a range of national aviation policy documents which collectively set out government policy. These are identified in turn.

The Aviation Policy Framework

6.2.3 According to the Department for Transport's website, "*The aviation policy framework sets out the government's policy to allow the aviation sector to continue to make a significant contribution to economic growth across the country. It provides the baseline for the Airports Commission to take into account on important issues such as aircraft noise and climate change. It sets out government's objectives on the issues which will challenge and support the development of aviation across the UK*."

6.2.4 The Aviation Policy Framework (APF) (March 2013) continues to set out Government's high-level objectives for aviation.

6.2.5 Paragraphs 1.38 and 1.39 of the Airports NPS explain the relationship between the Airports NPS and the APF, including the position to be taken for the purposes of decision-making. It states that the Airports NPS sets out Government policy on expanding airport capacity in the South-East of England, in particular by developing a Northwest Runway at Heathrow Airport. Any application for a new Northwest Runway development at Heathrow will be considered under the Airports NPS but that other Government policy on airport capacity is set out in the APF.

6.2.6 The Airports NPS does not affect Government policy on wider aviation issues, for which the 2013 APF "*and any subsequent policy statements*" still apply. Consequently, the APF

[41] Department for Transport – *Flightpath to the Future : A Strategic Framework for the Aviation Sector* (May 2022) - https://www.gov.uk/government/publications/flightpath-to-the-future-a-strategic-framework-for-the-aviation-sector

remains relevant policy for proposals covering expansion at airports other than Heathrow, although it needs to be read together with more recent policy statements.

6.2.7 The policy context section of the **Needs Case** (Doc Ref. 7.2) reviews the principles set out in the APF, including the importance it attaches to the aviation sector and its affirmation that aviation needs to grow, delivering the benefits essential to economic wellbeing, whilst respecting the environment and protecting quality of life but that the right balance needs to be struck to ensure that the UK's long-term economic prosperity is safeguarded.

6.2.8 The APF explains that a key priority is to work with the aviation industry and other stakeholders to make better use of existing runway capacity at all UK airports (Executive Summary paragraph 10). Paragraph 1.24 confirms that "*the Government wants to see the best use of existing airport capacity*" and paragraph 1.60 of the APF summarises the Government's strategy, as follows:

> "*Taking into account responses to the scoping document, our strategy is based on a suite of measures focused on:*
>
> - *making best use of existing capacity to improve performance, resilience and the passenger experience;*
> - *encouraging new routes and services;*
> - *supporting airports outside the South East to grow and develop new routes; and*
> - *better integrating airports into the wider transport network*."

6.2.9 Section 8 of this Planning Statement considers the extent to which the Project accords with the policy to make best use of existing capacity – taking account of the APF policy and the nature of similar policy expressions in subsequent policy statements.

Airports National Policy Statement (2018)

6.2.10 The Government designated the Airports National Policy Statement (ANPS) on 26th June 2018. On 6th September 2021, the SoS for Transport, after considering requests for a review of the ANPS under Section 6 of The Act, decided that it was not appropriate to review the ANPS at that time.

6.2.11 The Airports NPS does not have 'effect' in relation to the Project but paragraphs 1.14 and 1.41 of the ANPS confirm that it will be an important and relevant consideration in respect of any application for new runway capacity and other airport infrastructure in London and the South-East of England.

6.2.12 Paragraph 1.1 recognises that the UK aviation sector plays an important role in the modern economy, contributing around £20 billion per year and directly supporting approximately 230,000 jobs. The positive impacts of the aviation sector extend beyond its direct contribution to the economy by also enabling activity in other important sectors like business services, financial services, and the creative industries. Specifically, it notes that the UK has the third largest aviation network in the world, and London's airports serve more routes than the airports of any other European city.

6.2.13 Paragraph 1.2 specifically notes that London and the South East are now facing longer term capacity problems. Heathrow Airport is operating at capacity today, Gatwick Airport is operating at capacity at peak times, and the whole London airports system is forecast to be full by the mid-2030s. As a result, London airports are beginning to find that new routes to important long-haul destinations are being set up elsewhere in Europe and that this is having an adverse impact on the UK economy and affecting the country's global competitiveness.

6.2.14 In view of capacity constraints and at the same time as supporting the development of a third runway at Heathrow, paragraph 1.39 of the ANPS states:

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

6.2.15 While paragraph 1.42 of the ANPS states:

> *"… airports wishing to make more intensive use of existing runways will still need to submit an application for planning permission or development consent to the relevant authority, which should be judged on the application's individual merits. However, in light of the findings of the Airports Commission on the need for more intensive use of existing infrastructure as described at paragraph 1.6 above, the Government accepts that it may well be possible for existing airports to demonstrate sufficient need for their proposals, additional to (or different from) the need which is met by the provision of a Northwest Runway at Heathrow. As indicated in paragraph 1.39 above, the Government's policy on this issue will continue to be considered in the context of developing a new Aviation Strategy.'"*

6.2.16 Paragraph 2.11 recognises that the UK now faces a significant capacity challenge with Heathrow Airport currently the busiest two-runway airport in the world, and Gatwick Airport the busiest single runway airport in the world. The ANPS fully recognises that London's airports are filling up fast and will all be full by the mid-2030s unless action is taken now to address this. The ANPS states that the consequences of not increasing airport capacity in the South East of England – the 'do nothing' or 'do minimum scenarios' – are detrimental to the UK economy and the UK's hub status (paragraph 2.14) and that operating existing capacity at its limits means there will be little resilience for unforeseen disruptions, leading to delays and fare increases as demand outstrips supply and the lack of available slots makes it more difficult for new competitors to enter the market (paragraph 2.15). Paragraph 2.16 states that the Government believes that not increasing capacity will impose costs on passengers and on the wider economy. Without expansion, capacity constraints would impose increasing costs on the rest of the economy over time, lowering economic output by making aviation more expensive and less convenient to use, with knock-on effects in lost trade, tourism and foreign direct investment.

6.2.17 Chapter 4 of the ANPS concerns Assessment Principles and sets out the general policies in accordance with which applications relating to a Northwest Runway at Heathrow Airport are

to be decided. Chapter 5 of the ANPS concerns the Assessment of Impacts. Whilst these principles and policy tests were designed to consider an application for a new runway at Heathrow, they provide a helpful framework of important and relevant considerations which can be used as a framework to test this DCO application. This exercise is undertaken in Sections 7 and 8 of this Planning Statement.

Beyond the Horizon: The Future of UK Aviation: Making Best Use of Existing Runways (2018)

6.2.18 This document was published in June 2018 around the same time as the ANPS and sets out the Government's response to a recommendation by the Airports Commission for other airports besides Heathrow to make more intensive utilisation of their existing infrastructure. Paragraph 1.5 states that the Government agreed with the Airports Commission's recommendation and was minded to be supportive of all airports who wish to make best use of their existing runways, including those in the South East, subject to environmental issues being addressed.

6.2.19 In reaching its conclusion, the Government did consider whether its making best use policy was compatible with the UK's climate change commitments (paragraph 1.12) and it considered the impact of allowing all airports to make best use of their existing runway capacity. The Government concluded after further analysis, that future carbon emissions can be managed and that there is a case for airports making best of their existing runways across the whole of the UK (paragraph 1.25).

6.2.20 Paragraph 1.29 concludes:

> *"Therefore, the government is supportive of airports beyond Heathrow making best use of their existing runways. However, we recognise that the development of airports can have negative as well as positive local impacts, including on noise levels. We therefore consider that any proposals should be judged by the relevant planning authority, taking careful account of all relevant considerations, particularly economic and environmental impacts and proposed mitigations. This policy statement does not prejudge the decision of those authorities who will be required to give proper consideration to such applications. It instead leaves it up to local, rather than national government, to consider each case on its merits".*

6.2.21 The compliance of the Project with the principles of the Government's making best use (MBU) policies is considered in Section 8 of this Statement under the heading 'Principle of Development'.

Flightpath to the Future: A Strategic Framework for the Aviation Sector (2022)

6.2.22 The Government published a Green Paper *Aviation 2050* in 2018 for consultation, as an important step in its development of a national aviation strategy. Its terms are reviewed at Section 3.5 of the **Needs Case** (Doc Ref. 7.2) and not repeated here as it was a consultation document and has been overtaken to some extent by the publication of *Flightpath to the Future* Nevertheless, the DfT's website makes clear that the Government has only so far

partially responded to the consultation and that *Flightpath to the Future* was published to establish medium term policy in response to the pandemic, so that a full Aviation Strategy covering all of the matters set out in Aviation 2050 is still to be developed. Accordingly, weight attaches to Aviation 2050.[42]

6.2.23 In May 2022, the Government published its 10-year (medium-term) strategic framework for the UK aviation sector following the Aviation 2050 (2018) consultation[43], which included a wide-ranging analysis of the industry's future. The Ministerial Foreword reaffirms the Government's position that aviation need not decline for climate change targets to be met and that aviation remains of huge strategic importance to the country post-Brexit, allowing tourism, business and trade to thrive with the UK consolidating its position as one of the world's most important aviation hubs.

6.2.24 In the document, the Government reaffirms that airports have a key role to play in boosting global connectivity and that the Government continues to be supportive of sustainable airport growth. Importantly, the document states (on page 7) that its existing planning frameworks for airport growth (*Beyond the Horizon – The future of UK aviation: Making best use of existing runways, June* 2018) and *Airports National Policy Statement: new runway capacity and infrastructure at airports in the South-East of England* (2018) are the most up-to-date policy on planning for airport development and provide a robust and balanced framework for airports to grow sustainably within strict environmental criteria – and that they continue to have full effect, as a material consideration in decision-taking on applications for planning permission.

6.2.25 The Framework confirms the Government's commitment to growth. The clear goal is to make UK aviation cleaner, greener, and more competitive than ever before. The framework provides a 10-point action plan for how the Government and industry will work together to deliver key priorities for the sector focusing on four key themes as follows:

- enhancing global impact for a sustainable recovery
- embracing innovation for a sustainable future
- realising benefits for the UK
- delivering for users

6.2.26 In *'realising benefits for the UK'*, the Government recognises the key role that airport expansion plays through boosting global connectivity and levelling-up in addition to strengthening union connectivity, boosting economic success and supporting local job plus providing benefits to communities and supporting associated supply chains and the aerospace industry.

6.2.27 The Government also recognises that the future of aviation rests on embracing new opportunities, including the critical challenge of delivering Jet Zero – aviation's contribution to

[42] Weight was attached to Aviation 2050 in the SoS's decision on proposals at Manston Airport in August 2022 and, particularly, that the document identified a need for aviation capacity by 2030. https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-006369-220818%20-%20Manston%20Airport%20PA08%20Decision%20Letter.pdf

[43] Aviation 2050 — the future of UK aviation – GOV.UK (www.gov.uk) - https://www.gov.uk/government/consultations/aviation-2050-the-future-of-uk-aviation

achieving the UK's net zero target by 2050.

Jet Zero Strategy: Delivering net zero aviation by 2050 (2022)

6.2.28 This document was published by the Department for Transport in July 2022 following a detailed technical consultation and it sets the Government's framework and plan for achieving net zero aviation (Jet Zero) by 2050. It recognises that aviation is expected to become one of the largest emitting sectors by 2050 but is clear that aviation has a critical role to play in boosting trade, tourism and travel. The Jet Zero Strategy is clear that the Government supports growth in the aviation sector but is also committed to meeting its binding carbon reduction targets:

> *"**Meeting this challenge is vital for UK connectivity and growth**. The Government recognises the aviation sector's role in making us one of the world's best-connected and most successful trading nations. We are committed to enabling the recovery of the sector to support our levelling up agenda through regional connectivity and to strengthen ties within the Union, as well our connectivity globally. We need solutions that reduce the sector's emissions whilst delivering economic benefits across the UK."* (Executive Summary, page 7)

6.2.29 The strategy is underpinned by an overarching approach and three principles. The Government has set clear decarbonisation goals; in addition to the 2050 net zero target, all domestic flights are to achieve net zero by 2040 and all airport operations in England are to be zero emission by the same year.

6.2.30 The Strategy sets out a comprehensive package of measures to achieve these objectives, ranging from market mechanisms, to investment in new sustainable technologies. Six headings are identified for these measures:

- **System Efficiencies** - improve the efficiency of the existing aviation system including airports, airspace, and aircraft;
- **Sustainable Aviation Fuels** - building a thriving UK sustainable aviation fuel industry, bringing UK innovations to the commercial market, supporting thousands of green jobs, and supporting the UK's fuel security;
- **Zero Emission Flights** – developing and bringing into commercial service novel forms of aircraft that offer the potential for zero carbon tailpipe emissions;
- **Markets and Removals -** creating successful carbon markets and investing in greenhouse gas removals to compensate for residual emissions in 2050;
- **Influencing Consumers -** preserving the ability for people to fly whilst supporting consumers to make sustainable aviation travel choices; and
- **Addressing non-CO_2 -** working closely with academia and industry to better understand the science and potential mitigations of non-CO2 impacts.

6.2.31 The Strategy recognises that developments in sustainable fuel are just one way to cut carbon. Increasing the efficiency of aircraft, airports, airfields, and use of airspace, accelerating the transition to zero emission aircraft, developing carbon markets and greenhouse gas removal methods, and helping consumers to make sustainable flying choices are also part of the solution.

6.2.32 Under the heading *'Influencing Consumers'* the Government sets out its aim to preserve the ability for people to fly whilst supporting consumers to make sustainable aviation travel choices. In this section, the Government confirms:

- **It remains committed to growth in the aviation sector and working with industry to ensure a sustainable recovery from the pandemic** – the Government refers to its strategic framework for the future of aviation - *Flightpath to the Future* – where it is clear that the Government will continue to be supportive of airport growth where it is justified. The Government confirms that its existing policy frameworks for airport planning provide a robust and balanced framework for airports to grow sustainably within its strict environmental criteria. However, the Strategy is clear that expansion of any airport in England must meet its climate change obligations to be able to proceed (paragraph 3.56); and

- **It can achieve Jet Zero without needing to intervene directly to limit aviation growth with knock-on economic and social benefits -** "*Our approach to sustainable growth is supported by our analysis (set out in the supporting analytical document) which shows that* ***we can achieve Jet Zero without the Government needing to intervene directly to limit aviation growth.*** *The analysis uses updated airport capacity assumptions consistent with the latest known expansion plans at airports in the UK. The analysis indicates that it is possible for the potential carbon emissions resulting from these expansion schemes to be accommodated within the planned trajectory for achieving net zero emissions by 2050, and consequently that our planning policy frameworks remain compatible with the UK's climate change obligations*." (paragraph 3.57)

6.2.33 The Strategy does identify that its economy-wide Net Zero Strategy considers that, even if there was no step-up in ambition on aviation decarbonisation (e.g. through its "*continuation of current trends*" scenario), that it would still be able to achieve net zero by 2050. However, this is not the proposed approach. Instead, the Strategy commits to ambitious action to reduce in-sector aviation emissions. In this context, the Strategy confirms that it will use its 'High Ambition Scenario' to monitor the progress of the aviation sector (paragraph 3.58).

6.2.34 The Strategy sets out the Government's policy commitments for a 5-year delivery plan (Section 4) and explains how it will implement its approach against key milestones. Amongst its policy commitments, the Strategy commits to:

- **Support airport growth where it can be delivered within its environmental obligations** - the Government's existing policy framework for airport planning in England – the Airports National Policy Statement (ANPS) and Beyond the horizon, the future of UK aviation: Making best use of existing runways (MBU) – have full effect, as a material consideration in decision making on applications for planning permission. The Government's analysis shows that it is possible to achieve its goals without the need to restrict people's freedom to fly.

- **Keep under review whether further guidance is needed to assist airport planning decision-making, with particular reference to environmental impacts** – the Government advises that applicants should provide sufficient detail regarding the likely environmental and other effects of airport development to enable communities and planning decision-makers to give these impacts proper consideration. (page 74)

6.2.35 Monitoring forms a critical component of the Jet Zero Strategy. The Strategy expresses confidence that Jet Zero can be achieved but also makes clear that the Government will work actively to ensure that its commitments are met, stating:

> "*We will monitor progress against our trajectory on an annual basis, followed by a major review of our Strategy every five years. We recognise that many of the technologies needed to decarbonise the sector are at an early stage of development and therefore, we have committed to reviewing our Strategy every five years and will use these reviews to take stock of how emerging technologies are developing, whether they are developing at the pace required and if they are being adopted by the sector. If we find that the sector is not meeting the emissions reductions trajectory, we will consider what further measures may be needed to ensure that the sector maximises in-sector reductions to meet the UK's overall 2050 net zero target*." (page 10)

6.2.36 It is clear from page 10 of the Jet Zero Strategy that Government does not consider it necessary to manage (limit) aviation growth. The Strategy refers the reader for more detail to the Government's response to consultation on the draft Jet Zero Strategy. In that Response, the Government explained that it had received many responses suggesting that a necessary approach was to introduce demand management – to limit new capacity. However, the Response made clear that the Government did not consider that necessary:

> *"3.1 Whilst we did not consult on any direct demand management measures through either the Jet Zero consultation or further technical consultation, this theme was raised regularly by respondents to every question posed.*
>
> *3.2 The aviation sector is important for the whole of the UK economy in terms of connectivity, direct economic activity, trade, investment and jobs. Before COVID-19, it facilitated £95.2 billion of UK's non-EU trade exports; contributed at least £22 billion directly to GDP; and directly provided at least 230,000 jobs across all regions of the country.*
>
> *3.3 The Government remains committed to growth in the aviation sector where it is justified and to working with industry to ensure a sustainable recovery from the pandemic. Our analysis set out in the Jet Zero Strategy shows that the aviation sector can achieve Jet Zero without government needing to intervene directly to limit aviation growth, with scenarios that can achieve our net zero targets by focusing on new fuels and technology, with knock-on economic and social benefits, without limiting demand. Our 'high ambition' scenario has residual emissions of 19.3 MtCO2e in 2050[40], compared to 23 MtCO2e residual emissions in the CCC's Balanced Pathway. We recognise that to achieve this trajectory we will need to see significant investment in, and uptake of, new technologies and operational processes and government is committed to working with the sector to ensure we achieve our aims.*
>
> *3.4 Furthermore, airport growth has a key role to play in boosting our global connectivity and levelling up in the UK. The Government is, and remains, supportive of airport expansion where it can be delivered within our*

environmental obligations. Our existing policy frameworks for airport planning - the ANPS and MBU - provide a robust and balanced framework for airports to grow sustainably within our strict environmental criteria. We do not, therefore, consider restrictions on airport growth to be a necessary measure."[44]

6.2.37 On 7th February 2023, the Government launched a 'call for evidence' so that information could be gathered to help it design policy to achieve the ambition for airport operations in England to be zero emission by 2040. The *2040 Zero Emissions Airport Target* consultation closed on 2nd May 2023.

6.3 National Networks Policy

National Networks National Policy Statement (2014)

6.3.1 While the primary purpose of the Project is airport-related development, highways improvements are proposed in order to facilitate the increased passenger throughput (specifically improvements to the North Terminal and South Terminal roundabouts). These highway works meet the threshold for a highways NSIP in their own right as set out in Section 22(4) and Section 25(1) of The Act. Therefore, the NPS for National Networks[45] has effect for these parts of the Project.

6.3.2 The NNNPS sets out the need for development of road, rail and strategic rail freight interchange projects on the national networks and the policy against which decisions on major road and rail projects will be made. It provides planning guidance for promoters of nationally significant infrastructure projects on the road and rail networks, and the basis for the examination by the Examining Authority and decisions by the SoS.

6.3.3 In 2022, the DfT launched a review of the NNNPS, in part to reflect new legislation set out in the Environment Act 2021. Following this review, a Draft NPS for National Networks was published for consultation on 14 March 2023. The draft NNNPS confirms in paragraph 1.16 that the existing NNNPS remains the relevant government policy and has full force and effect in relation to any applicable applications for development consent accepted for examination before designation of the updated NNNPS. The draft NNNPS further notes in paragraph 1.17 that the emerging draft NNNPS is capable of being an important and relevant consideration in the SoS's decision-making process. As such, the Applicant will continue to monitor the progress of the NNNPS review process and incorporate any updates to the Project's application documentation when considered appropriate/helpful in due course.

6.3.4 Section 2 of the NNNPS sets out government policy on the need for the development of national networks. The NNNPS is clear on the importance of national networks:

[44] Jet Zero consultation: summary of responses and government response uly 2022. Available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1091862/jet-zero-consultation-summary-of-responses-and-government-response.pdf

[45] Department for Transport – *National Policy Statement for National Networks* (December 2014) - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/387222/NNNPS-print.pdf

"2.1 The national road and rail networks that connect our cities, regions and international gateways play a significant part in supporting economic growth, as well as existing economic activity and productivity and in facilitating passenger, business and leisure journeys across the country. Well-connected and high-performing networks with sufficient capacity are vital to meeting the country's long-term needs and support a prosperous economy.

2.2 There is a critical need to improve the national networks to address road congestion and crowding on the railways to provide safe, expeditious and resilient networks that better support social and economic activity; and to provide a transport network that is capable of stimulating and supporting economic growth."

6.3.5 Enhancement of national networks is supported for a number of reasons, including the importance of serving international gateways, such as airports:

"2.8 There is also a need to improve the integration between the transport modes, including the linkages to ports and airports. Improved integration can reduce end to – end journeys and provide users of the networks with a wide range of transport choices."

6.3.6 Accordingly, the NNNPS is clear:

"2.10 The government has therefore concluded that a strategic level, there is a compelling need for development of the national networks – both as individual networks and as an integrated system. The Examining Authority and the SoS should therefore start their assessment of applications for infrastructure covered by this NPS on that basis."

6.3.7 Paragraphs 2.10 and 2.22 make it clear that the Government has concluded that at a strategic level, there is a compelling need for development of the national networks – both as individual networks and as an integrated system.

6.3.8 Paragraph 2.23 states that the Government's wider policy is to bring forward improvements and enhancements to the existing Strategic Road Network to address needs. Enhancements to the existing national road network will include:

- junction improvements, new slip roads and upgraded technology to address congestion and improve performance and resilience at junctions, which are a major source of congestion; and
- improvements to trunk roads, in particular dualling of single carriageway strategic trunk roads and additional lanes on existing dual carriageways to increase capacity and to improve performance and resilience.

6.3.9 The NNNPS (at paragraph 3.16) confirms the Government's commitment to sustainable travel to encourage sustainable transport modes including public transport, significant improvements to rail capacity and quality, cycling and walking. However, paragraph 2.11 confirms that it is not realistic for public transport, walking or cycling to represent a viable alternative to the private car for all journeys, particularly in rural areas and for some longer or

multi-leg journeys.

6.3.10 Section 5 of the NNNPS sets out the assessment principles and general policies in accordance with which applications relating to national networks infrastructure are to be decided. Paragraph 4.2 makes it clear that, subject to the detailed policies and protections in the NNNPS, and the legal constraints set out in The Act, there is a presumption in favour of granting development consent for national networks NSIPs that fall within the need for infrastructure established in the NNNPS.

6.3.11 Paragraph 4.3 states that, in considering any proposed development, and in particular, when weighing its adverse impacts against its benefits, the Examining Authority and the SoS should take into account:

- its potential benefits, including the facilitation of economic development, including job creation, housing and environmental improvement, and any long-term or wider benefits;
- its potential adverse impacts, including any longer-term and cumulative adverse impacts, as well as any measures to avoid, reduce or compensate for any adverse impacts.

6.3.12 Section 12.2 in **ES Chapter 12: Traffic and Transport** (Doc Ref. 5.1) provides a summary of the relevant requirements of the NNNPS and how these are addressed within the **ES**. The individual topic chapters in the **ES** include (where relevant to that topic) a summary of the relevant requirements of the NNNPS and how they are addressed in the assessment in that chapter.

6.3.13 Sections 7 and 8 of this Planning Statement consider the Project against the policy tests established by the ANPS and the NNNPS with reference to the **ES** conclusions.

6.4 Planning Policy

National Planning Policy Framework

6.4.1 The latest version of the National Planning Policy Framework (NPPF) was published in July 2021. This document sets out the Government's planning policies for England and how these are to be applied in relation to the determination of planning applications made under the Town and Country Planning Act 1990 (as amended). The Framework does not contain specific policies for nationally significant infrastructure projects.

6.4.2 Paragraph 5 confirms that nationally significant infrastructure projects are to be determined in accordance with the decision-making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework). National policy statements form part of the overall framework of national planning policy.

6.4.3 The NPPF may be an important and relevant consideration in decision making for applications for development consent.

6.4.4 Further details about the policies in this document that are relevant are provided in **ES Appendix 2.2.1: National Planning Policy Context** (Doc Ref. 5.3) and they are further referenced in Chapters 7-19 of the **ES** where they are relevant to the topic assessments.

National Planning Practice Guidance

6.4.5 On 6 March 2014, the then Department for Communities and Local Government (DCLG) (now Department for Levelling Up, Housing and Communities, DLUHC) launched the planning practice guidance web-based resource to support the NPPF. The National Planning Practice Guidance (NPPG) provides guidance across a range of topic areas, including in relation to environmental topic areas relevant to the EIA process. There is guidance which explains the EIA process and relevant stages. Further detail is provided in Chapters 7-19 of the **ES** where relevant to the assessments. The NPPG does not set policy tests for NSIPs.

6.5 Strategic Regional Documents

Gatwick Diamond Local Strategic Statement (LSS) (June 2017) [46]

6.5.1 Stretching from the border with London to the Brighton coastline, the Gatwick Diamond area is home to 45,000 businesses and 500 international businesses, including many large multinationals. It centres around Gatwick Airport and its key sectors include medical engineering, aerospace and service industries, particularly in Manor Royal Business District, Crawley. The Gatwick Diamond includes the districts of Crawley, Epsom & Ewell, Horsham, Mid Sussex, Mole Valley, Reigate & Banstead and Tandridge. It covers several towns, including Crawley, Horsham, Haywards Heath, Burgess Hill, East Grinstead, Leatherhead**,** Epsom, Dorking, Oxted, Reigate and Redhill (Figure 6.1):

Figure 6.1: The Gatwick Diamond Area

[46] Microsoft Word - Gatwick Diamond LSS Refresh 2016 030417.docx (crawley.gov.uk)

6.5.2 The Gatwick Diamond is one of the most economically successful regions in the UK. With an economy larger than Birmingham, Liverpool or Leeds, it produces a gross value added (GVA) of £24 billion, making it 16% more productive than the British economy as a whole.

6.5.3 The area's economy performs well above the national average on a range of different economic indicators, such as its levels of productivity, share of high-skilled jobs, and track record in attracting foreign investment.

6.5.4 Gatwick Airport underpins the success of the Gatwick Diamond economy and is one of the key growth catalysts for the region, attracting new and diverse investment and industry to the area. It is also recognised as being one of the UK's major Global Gateways and plays a crucial role in sustaining a dynamic and innovative business environment in the region that is attractive to key sectors and high-value economic clusters. It also supports the growth of the local business base through new business opportunities associated with its procurement and supply chains.

6.5.5 The Gatwick Diamond authorities published the Gatwick Diamond Local Strategic Statement (GD LSS) in 2012 and this was refreshed in 2016. The Gatwick Diamond authorities comprise Surrey County Council and West Sussex County Council, and the local authorities of Crawley Borough, Epsom and Ewell Borough, Horsham District, Mid Sussex District, Mole Valley District, Reigate and Banstead Borough, together with Tandridge District.

6.5.6 The GD LSS established a framework for joint working and a means to help fulfil the Duty to Co-operate covering common strategic planning and development themes across the Gatwick Diamond authorities (paragraph 1.3).

6.5.7 The Gatwick Diamond area is incorporated within the Coast to Capital Local Enterprise Partnership (LEP). The GD LSS recognises that it should take account of the LEP's Strategic Economic Plan (see below).

6.5.8 The GD LSS recognises that the airport has a significant influence on the economy and prosperity of the Gatwick Diamond (paragraph 2.5).

6.5.9 The GD LSS is based on Gatwick Airport continuing to operate on the basis of a single runway with two terminals (paragraph 1.6) and was formulated well before the NRP was proposed.

6.5.10 The Vision for the GD LSS is for the Gatwick Diamond to be a world-class, internationally recognised business location achieving sustainable prosperity and growth by 2031. The six priority themes are:

1. Achieving a Sustainable Economy and Prosperity including Supporting Low Carbon Growth;
2. Investing in Urban and Rural Centres;
3. Delivering a Choice and Mix of Homes;
4. Education and Skills;
5. Infrastructure; and
6. High Quality Natural Environment, Countryside and Landscape.

6.5.11 Priority Theme 1 (Achieving a Sustainable Economy and Prosperity including Supporting Low Carbon Growth) supports economic growth to:

- ensure that opportunities to grow a knowledge-driven economy are maximised;
- develop and maintain strategies for securing more sustainable forms of development to deliver an efficient, low carbon economy;
- sustain a flourishing and competitive knowledge-based economy with high levels of entrepreneurship, providing sustainable employment;
- allow businesses to operate in an environment which enables the Diamond to be recognised, nationally and internationally, as one of the top locations for businesses;
- regenerate areas which need change and improvement to meet modern investor and business expectations.

6.5.12 Priority Theme 4 (Education and Skills) supports the delivery:

- strong, growing and aspirational communities with the skills to access the job opportunities available in the Diamond;
- opportunities for research and development, fostering start-up and grow on floorspace that allows higher skills capacity to be used to the benefit of the Gatwick Diamond economy;
- a higher education presence within the Gatwick Diamond by working with partners from inside and outside the area;
- skills improvement activities ranging from local employment schemes with employers to working with education bodies, to establish programmes that operate across the Gatwick Diamond area.

6.5.13 Priority Theme 5 (Infrastructure) supports the delivery of transport, communications, healthcare and waste and minerals infrastructure including through the growth of Gatwick Airport to its maximum capacity as a single runway, two terminal airport subject to ongoing agreements and commitments to manage the environmental impacts (paragraph 4.21). This will be achieved by continuing to support Gatwick Airport to secure a high-quality environment for travellers at the airport and a range of routes which meet the needs of business users as well as those of the wider tourist market (paragraph 4.25).

Gatwick 360˚ - The Coast to Capital Strategic Economic Plan (SEP) (2018 – 2030) (Summer 2018)[47]

6.5.14 The Coast to Capital LEP covers the Coast to Capital area which is defined as West Sussex, East Surrey and Brighton and Hove. The aim of the LEP is to drive economic growth. The Strategic Economic Plan aims to shape the LEP's vision and priorities for the Coast to Capital area.

6.5.15 The plan states that the title 'Gatwick 360˚' is a direct acknowledgement of London Gatwick airport's place at the geographical and economic heart of the area. It recognises that Gatwick fuels business, attracting employers, generating jobs and driving commerce from

[47] [redacted]

Croydon through Surrey to Brighton and across West Sussex and the coastal towns. It further recognises that Gatwick is vital to London's economy and to the UK's place in an international trade environment. Gatwick is further recognised for its role in linking the UK to global markets which helps to deliver the right trading conditions for businesses across London and the wider South East (page 5).

6.5.16 The Plan describes Gatwick as a gateway for trade, a national asset and the single biggest employment and business hub in the LEP area. It also states that Gatwick defines the opportunity for growing the LEP area's economy (page 15). The Plan recognises the opportunities presented by Gatwick as follows:

- for customers - by connecting markets in our area, in London and the rest of the UK.
- for a global and connected economy - by attracting investment.
- for economic growth - through employment, development and increased prosperity.
- for innovation, technology and skills – to help keep the area's economy competitive.

6.5.17 The LEP states that its vision for economic success depends on the sustainable growth of Gatwick airport. It recognises that the reach and importance of the airport gives the LEP area a unique set of opportunities and strengths on which to build a future economy. Importantly, it notes that a vibrant and successful airport is essential for the area's competitiveness and will allow the LEP to attract businesses from London and elsewhere. The LEP recognises that Gatwick is key to attracting investment, driving exports to global markets and nurturing innovation across different economic sectors. The LEP relies on a stronger industrial base in the area, based around the airport, which will spread to the coastal and rural economy (page 16).

6.5.18 The LEP identifies three main areas in which Gatwick's continued competitiveness can support the delivery of their Strategic Economic Plan (page 16):

1. **International Connectivity** – the LEP states that it is in their area's interest for Gatwick to expand its route network. More flights beyond European markets, including freight as well as passenger transit, bigger planes to increase capacity and continued innovation in the aviation industry will support the Coast to Capital and wider South East economy.
2. **Business Growth** – the LEP recognises that Gatwick airport is the single biggest driver of economic growth in the area and that its influence is especially important to the M23 corridor. The LEP also important improved infrastructure and business links to Gatwick are for raising the investment profile of coastal places, such as Newhaven, Littlehampton and Bognor Regis.
3. **Attracting Development** – the LEP is encouraging the planning and strategic authorities around Gatwick to cooperate and collaborate in maximising the economic potential of the area. It appreciates the excellent public transport and road connectivity for the airport, and the lack of planning constraints on much of the land around it make it an ideal anchor for further development of business space and housing, both of which are in acute demand in the area. The LEP recognises that Crawley, and other places close to the airport including the six local planning authorities and two county councils which share a boundary with the airport, have benefitted for decades from the growth of the airport.

6.5.19 The LEP's vision by 2030 is for "*its towns and cities to be known around the world as fantastic places to live, to grow and to succeed. We will become the most dynamic non-city region in England, centred around a highly successful Gatwick airport*" (page 17).

6.5.20 The LEP identifies eight economic priorities. Priority 6 is to promote better transport and mobility. To do this, the LEP states that it will build a strong area-wide consensus in strong support of the growth of Gatwick airport within its existing capacity (page 46). Priority 8 is to build a strong, national and international profile by focussing efforts on attracting domestic and foreign direct investment we can help provide a major boost to the visitor economy and achieve the LEP's vision for economic growth (page 53).

The London Plan 2021[48]

6.5.21 The Mayor states in the London Plan that he strongly opposes any expansion of Heathrow Airport that would result in additional environmental harm or negative public health impacts. The Mayor believes that expansion at Gatwick could deliver significant benefits to London and the UK more quickly, at less cost, and with significantly fewer adverse environmental impacts (paragraph 10.8.6).

6.5.22 Paragraph 10.8.2 states that London's major airports provide essential connectivity for passengers and freight, support vital trade, inward investment and tourism, generate prosperity, and provide and support significant numbers of jobs.

6.5.23 Paragraph 10.8.3 states that it is important, in the first instance, to make best use of existing airport capacity, which fast, frequent, sustainable surface access can support.

6.5.24 Policy T8 (Aviation) states that the Mayor supports the role of the airports serving London in enhancing the city's spatial growth. It requires any airport expansion scheme to be appropriately assessed and if required, demonstrate that there is an overriding public interest or no suitable alternative solution with fewer environmental impacts. Policy T8 further states that development proposals should make better use of existing airport capacity, underpinned by upgraded passenger and freight facilities and improved surface access links, in particular rail.

6.6 Local Development Plan Documents

6.6.1 Local Development Plans are not the starting point for the consideration of a DCO. However, they can be a relevant consideration in the determination of an application for development consent. The policies contained within them are more likely to be relevant where they address specific local matters not covered in national aviation policy.

6.6.2 As part of the post-submission process, the host local authorities will be invited to submit a Local Impact Report (LIR) giving details of the likely impact of the proposed development on the relevant authority's area. Section 105 requires the SoS to take into account LIRs. It is likely that local authorities will refer to their Development Plan documents in compiling their LIRs.

[48] [redacted]

6.6.3 As set out in Section 1 of this Statement, the ANPS states that its policies "*will be an important and relevant consideration in the determination of applications for new runway capacity or other airport infrastructure in London and the South East of England*". In that context, whilst local development plan polices may be relevant, they are likely to be of secondary importance compared with national aviation policy. This much is acknowledged in the Crawley Borough Local Plan, which recognises that "*any decision about the significant growth of the airport (such as a second runway) would be a matter for government policy*." (paragraphs 1.38 and 9.5).

6.6.4 It is also important to note that many of the Local Plan documents pre-date the 2019 Gatwick Masterplan and the decision taken by GAL, following publication of its 2019 Masterplan, to progress growth at the airport to 80.2 mppa by 2047 through the NRP. Many of the documents support growth at the airport to approximately 45mppa by 2030 based on Gatwick's previous Masterplan. Paragraph 4.11 of the Aviation Policy Framework (2013) states that, whilst adopted airport masterplans do not have a statutory basis, their primary objective is to provide a clear statement of intent on the part of an airport operator to enable future development of the airport to be given due consideration in local planning processes. GAL expect their 2019 Masterplan and the NRP proposals to inform the content of the Local Plan reviews which are progressing, or which are expected to come forward in the host authority boundaries soon.

6.6.5 Summarised below are the principal policies contained in the Local Development Plan documents covering those local authorities within which the Order Limits of the Project fall. This relates to Crawley Borough Council, Reigate and Banstead Borough Council, Mole Valley District Council and Tandridge District Council, being the Category B authorities for the purposes of Section 43 of the Planning Act 2008. A plan showing the planning policy designations that apply to land within and on the edges of the Order Limits is provided as **Appendix B** in this Planning Statement. Local policies are potentially relevant to the application but, where any conflict arises between local and national policy, national policy would prevail.

Crawley 2030: Crawley Borough Local Plan 2015-2030 (December 2015)

6.6.6 The adopted Crawley Local Plan sets the way forward for planning the future of Crawley and guiding development for the 15 years to 2030.

6.6.7 As part of the Local Plan Vision (Crawley 2030: A Vision), the plan states that Crawley will continue to be an economic leader, meeting the needs of significant employers who are important to the overall prosperity of the region. A business environment that supports and encourages new and established businesses to grow and flourish will be developed. The Council's Vision recognises that Gatwick Airport is important as it supports the economic growth of Crawley.

6.6.8 Paragraph 1.37 states that the Local Plan has been prepared on the basis of supporting the growth of Gatwick Airport to a throughput of 45 million passengers per annum within its current configuration of a single runway and two terminals. Land to the south of the airport, which may be required for airport development in the future is also safeguarded against incompatible development until the Government has established any relevant policies and proposals in relation to additional airport capacity in the UK (Policy GAT2). Paragraph 2.15

of the Local Plan states that the 'economy of Crawley is buoyed by the presence of Gatwick Airport'.

6.6.9 Paragraph 2.5 recognises that Crawley along with 6 other local authorities (Epsom and Ewell, Horsham, Mid Sussex, Mole Valley, Reigate & Banstead and Tandridge) is part of the Gatwick Diamond – a sub-region which crosses the Surrey and West Sussex County boundary and which forms a central element of the Coast to Capital Local Enterprise Partnership (LEP). The LEP's Strategic Economic Plan identifies the "Heart of the Gatwick Diamond", including Crawley, Manor Royal and the north of Horsham allocations, as one of its spatial priorities for growth.

6.6.10 Paragraph 5.25 confirms that Gatwick Airport is a key economic location which is identified as a Main Employment Area. It performs a fundamental role in driving the Crawley and Gatwick Diamond economy. Paragraph 5.31 recognises that Gatwick Airport is a hub for employees and visitors, and a key economic driver through direct or indirect employment. The airport is central to the function of the wider economic area and provides a significant number of jobs, but, due to its unique strategic role, the policies for Gatwick and employment uses at the airport are established in a separate chapter in the Local Plan, dealing with the main planning policy matters for the Airport. The approach is set out in further detail under Policies GAT1 to GAT4 (see below).

6.6.11 Section 9 of the Local Plan concerns Gatwick Airport. Paragraph 9.2 recognises that Gatwick Airport generates a significant number of economic benefits both directly through its own employment requirements but also, indirectly, through the wider benefits to the regional and local economy which make Crawley and the wider Gatwick Diamond area attractive to employers and businesses. Paragraph 9.4 reiterates that the Council's planning policies support the growth of the airport to a throughput of 45 mppa with a single runway and two terminals. It further states that policy has been supported by legal agreements, which contain measures to help ensure that the environmental impact of this level of growth is mitigated. The latest agreement was signed in May 2022.

6.6.12 There are four policies within Section 9 of the Local Plan that relate to Gatwick Airport. They are summarised as follows:

- Policy GAT1 (Development of the Airport with a Single Runway) – within the airport boundary, the Council supports the development of facilities which contribute to the safe and efficient operation of the airport as a single runway, two terminal airport up to 45 million passengers per annum provided that:
  - The proposed use is appropriate within the airport boundary and contributes to the safe and efficient operation of the airport; and
  - Satisfactory safeguards are in place to mitigate the impact of the operation of the airport on the environment including noise, air quality, flooding, surface access, visual impact and climate change; and
  - The proposed use would not be incompatible with the potential expansion of the airport to accommodate the construction of an additional wide spaced runway.
- Policy GAT2 (Safeguarded Land) (Safeguarding for a Second Runway) - the Local Plan Map identifies land which will be safeguarded from development which would be incompatible with expansion of the airport to accommodate the construction of an

additional wide spaced runway (if required by national policy) together with a commensurate increase in facilities that contribute to the safe and efficient operation of the expanded airport. The Council states that minor development within this area, such as changes of use and small scale building works, such as residential extensions, will normally be acceptable. This land is shown on the plan provided as **Appendix B** to this Planning Statement.

- Policy GAT3 (Gatwick Airport Related Parking) - the provision of additional or replacement airport parking will only be permitted within the airport boundary. All new proposals must be justified by a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport.

- Policy GAT4 (Employment Uses at Gatwick) - permission for the loss of airport-related office floorspace within the airport boundary will only be permitted if it can be demonstrated that it will not have a detrimental effect on the long term ability of the airport to meet the floorspace need necessary to meet the operational needs of the airport as it expands.

  Permission for the creation of any non-airport related commercial floorspace within the airport boundary will only be permitted if it can be demonstrated that it will not have a detrimental effect on the long term ability of the airport to meet the floorspace need necessary to meet the needs of the airport as it expands and will not have an unacceptable impact on the roles and function of Crawley Town Centre or Manor Royal.

6.6.13 Crawley adopted the Gatwick Airport Supplementary Planning Document (SPD) in December 2008. Paragraph 1 of the SPD recognises that Gatwick Airport is one of the most important developments within the Borough and that its influence and impact extend far beyond the Borough boundary into the Gatwick/Crawley sub-region in terms of its environmental, social and economic impacts. The SPD assumes growth at the airport as a single runway operation with a passenger throughput of 40mppa. Paragraph 4 states that should any proposals come forward which may exceed the 40 mppa capacity, that the Council will need to consider reviewing the SPD. The SPD has not been updated despite passenger numbers reaching more than 46mppa in 2019.

Draft Crawley Borough Local Plan 2024-2040 (May 2023) (Regulation 19 Version)

6.6.14 Crawley Borough Council consulted on its Submission Draft Local Plan (Regulation 19 version) as part of its Local Plan Review between 9th May and 20th June 2023. Due to the timing of this consultation and the Local Plan Review being in its early stages, there has been no consideration made of the draft policies. GAL has submitted representations as part of the consultation including that CBC should take full and proper account of the Gatwick Master Plan 2019 which should be informing their Local Plan review.

6.6.15 In its vision for the new Local Plan, the Council recognises that the sustainable growth of Gatwick Airport will help to support the economic growth of Crawley. Paragraph 2.6 of the Submission Draft Local Plan recognises that Gatwick Airport is at the economic core of the Borough and an Economic Centre (paragraph 2.11). Paragraph 2.18 states that the economy of Crawley, and the wider Gatwick Diamond area, is buoyed by the presence of

Gatwick Airport. 75% of Crawley's jobs (by employment numbers) are in distribution, hotels, transport, communications, banking and finance of which Gatwick Airport accounts for approximately 25,000 jobs directly. Crawley is the main place of residence for airport employees with 26.9% of the workforce living in Crawley.

6.6.16 Paragraph 9.4 recognises the importance of Gatwick Airport to the success of Crawley's economy, and that of the wider Gatwick Diamond and Coast to Capital LEP which is significantly driven by Gatwick Airport. Coast to Capital recognise Gatwick Airport as accounting for £2.7 billion of economic activity in the LEP area.

6.6.17 Policy EC2 (Economic Growth in Main Employment Areas) identifies Gatwick Airport as a Main Employment Area. These areas are recognised for their significant contribution to the economy of the town and the wider area and are a focus for sustainable economic growth.

6.6.18 Section 10 deals specifically with Gatwick Airport. Paragraph 10.1 recognises that the airport generates a significant number of economic benefits both directly through its own employment requirements but also, indirectly, through the wider benefits to the regional and local economy which make Crawley and the wider Gatwick Diamond area attractive to employers and businesses.

6.6.19 Much like the adopted Local Plan, the emerging Local Plan includes four key policies for the airport which are summarised as follows:

- Policy GAT1 (Development of the Airport with a Single Runway) – within the airport boundary, the Council supports the development of facilities which contribute to the sustainable growth of Gatwick Airport as a single runway, two terminal airport provided that:

  - The proposed use is appropriate within the airport boundary and contributes to the safe, secure and efficient operation of the airport;
  - The adverse impacts of the operation of the airport on the environment and the health and living conditions of the local community, including noise, air quality, flooding, surface access, visual impact, and climate change, are minimised, that where necessary satisfactory safeguards are in place to ensure impacts are appropriately mitigated and, as a last resort, fair compensation is secured;
  - Biodiversity net gain is provided and significant harm to biodiversity is avoided. Where this is not possible, suitable safeguards are in place to ensure impacts can be adequately mitigated or, as a last resort, like for like compensation is secured;
  - Adequate supporting infrastructure, particularly for surface access, can be put in place; and
  - Benefits to Crawley's local economy and community are maximised.

  The draft Plan states that the control or mitigation of impacts, proportionate compensation, infrastructure and benefits will be secured through appropriate planning conditions and/or Section 106 obligations.

  Where development to enable sustainable growth at Gatwick Airport will be a Nationally Significant Infrastructure Project, such as the operational use of the northern runway, i-v above will be taken into account by the Council in responding to a DCO, and will be

expected to be met by the airport operator and secured through appropriate requirements or Section 106 obligations.

- Policy GAT2 (Safeguarded Land) (Safeguarding for a Second Runway) - the Local Plan Map identifies land that is safeguarded from development which would be incompatible with expansion of the airport to accommodate the construction of an additional wide spaced runway (if required by national policy) together with a commensurate increase in facilities that contribute to the safe and efficient operation of the expanded airport. Small scale development within this area will normally be acceptable.

  Planning applications for noise sensitive development will be considered on the basis of Air Noise Map – Additional Runway – Summer Day – 2040 as shown at Plan 31 of the Gatwick Airport Master Plan and in the Local Plan Noise Annex.

- Policy GAT3 (Gatwick Airport Related Parking) – the provision of additional or replacement airport-related parking will only be permitted where it is located within the airport boundary; and it is justified by a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport.

- Policy GAT4 (Employment Uses at Gatwick) - the loss of airport-related employment floorspace within the airport boundary will be permitted where it can be demonstrated that development will not have a detrimental impact on the long term ability of the airport to meet the floorspace need necessary to meet the operational needs of the airport as it grows.

  New non-airport related employment floorspace within the airport boundary will only be permitted where it can be demonstrated that this will not have a detrimental effect on the long term ability of the airport to meet the land and floorspace requirements necessary to meet the needs of the airport as it grows; and it will not have an unacceptable impact on the role and function of the other Main Employment Areas within Crawley borough and town centres and employment areas beyond Crawley's boundaries.

Reigate and Banstead Local Plan: Core Strategy (2014, reviewed June 2019)

6.6.20 The Core Strategy states that the Borough wants to secure economic prosperity in the future and that it wants to become more competitive and attractive to national and international businesses, and existing businesses which must be supported and allowed to grow (paragraph 3.9). The Council states that it wishes to harness the positive impacts of economic growth (paragraph 3.10).

6.6.21 Section 6.9 of the Core Strategy relates to Gatwick Airport. Paragraph 6.9.1 states that the Council will encourage sustainable economic growth to support expansion at Gatwick to 45mppa by 2021 using the existing runway and terminals and supporting Gatwick as an economic and transport hub. Policy CS9: Gatwick Airport states that the Council will support the development of Gatwick Airport, within the existing airport boundary and existing legal limits, including the development of facilities that contribute to the safe and efficient operation of the airport.

6.6.22 As part of the Core Strategy review in June 2019, the Council noted that Gatwick Airport had published a draft Masterplan setting out options for the future growth of the airport and that this maintains that the airport stands ready to provide additional runways (should the Government position change given its current preferred option in Heathrow only) but also a proposal to make better use of existing runways, including bringing into use the standby runway. The Council recognises that development of this nature would not technically be outside of the scope of Policy CS9.

Reigate and Banstead Local Plan Development Management Plan (September 2019)

6.6.23 This document contains policies that do not permit development in areas close to Gatwick Airport where they will be affected by the Gatwick Airport noise contours (Policy DES9: Pollution and Contaminated Land) and do not support proposals that fail to have regard to the open setting of Gatwick Airport (the Gatwick Open Setting designation) (Policy NHE1: Landscape Protection).

6.6.24 Land west of Balcombe Road, Horley adjacent to the M23 spur road to Gatwick Airport is identified for the Horley Strategic Business Park which is allocated as a Strategic Employment site under Policy HOR9. It is allocated for a strategic business park of predominantly offices; a complementary range of commercial, retail and leisure facilities to serve and facilitate the main business use of the site; and at least 5ha of new high quality public open space, including parkland and outdoor sports facilities. A new dedicated, direct access onto the strategic road network (M23 spur) would be required. Land at the southern most part of the site is proposed in the NRP as a temporary construction compound.

Saved Policies in the Mole Valley Local Plan (2000)

6.6.25 There are no relevant saved policies in the 2000 Local Plan. Paragraph 5.142, however, states that the Council will seek to ensure that any development proposals for the airport's North West Zone do not adversely affect the character and amenities of Charlwood and that appropriate screening and bunding is provided. Paragraph 5.143 states that in responding to consultations by Crawley Borough Council in respect of development on the airport (in this case, the Planning Inspectorate in respect of the NRP DCO application), the Council will press for all necessary environmental safeguards to be provided especially adequate noise attenuation, visual screening and landscaping.

Mole Valley Core Strategy (2009)

6.6.26 Policy CS12 (Sustainable Economic Development) states that the sustainable economic growth of the District’s economy will be supported including by working with partners and supporting initiatives and development which assists in improving the skills base of local residents.

6.6.27 Paragraph 2.44 states that the Council accepts the airport's growth to 40mppa within its single runway two terminal configuration, subject to environmental safeguards being in place, but is opposed to the development of a second runway.

Draft Mole Valley Local Plan 2020-2037 – Regulation 19 Version (2022)

6.6.28 As part of the Council’s Vision, it states that it wishes to ensure that the District’s existing and

new businesses flourish and that appropriate economic activity grows. Policy EC1 (Supporting the Economy) states that the sustainable growth of the Mole Valley economy will be supported.

6.6.29 Paragraph 7.32 of the draft Local Plan states that the Council recognises the economic benefit of Gatwick Airport to Mole Valley, and the wider region, and supports sustainable growth on a one-runway, two terminal basis. The Council further states that proposals involving the use of the emergency runway on a regular or scheduled basis are likely to have significant impacts and the Council has not yet seen evidence that they can be satisfactorily mitigated. Consequently, the Council opposes the construction of a third runway in addition to the main and emergency runway.

6.6.30 Policy INF6 relates to Gatwick Airport and states that the Council supports the sustainable growth of the airport as a single runway, two terminal airport. The policy states that development proposals must ensure the impacts of the operation on the environment are minimised and adequate supporting infrastructure is provided.

Tandridge District Core Strategy (2008)

6.6.31 The Council's vision is underpinned by a successful and sustainable economy (paragraph 4.1). Spatial Objective no.3 (Sustainable Economy) states that the Council will support an economy that is thriving and growing within environmental limits.

6.6.32 Gatwick affects the District because of aircraft taking off or coming into land over Tandridge. Objective no.2 in the list of the Council's spatial objectives states that the Council will secure environmental protection by minimising the impact of Gatwick Airport by working with GAL on the development of the airport up to the projected 45 million passengers per annum of the single runway and opposing expansion beyond its current agreed capacity. This is captured within Policy CSP16 (Aviation Development) which also states that the Council will oppose any expansion beyond the agreed limits that would adversely affect communities in Tandridge by way of aircraft noise or reduced air quality.

Tandridge Local Plan Part 2: Detailed Policies 2014-2029 (July 2014)

6.6.33 There are no relevant policies specifically relating to Gatwick Airport.

Tandridge Our Local Plan 2033 (Regulation 22 Submission Version) (January 2019)

6.6.34 Paragraph 28.3 states that the District's location in proximity to Gatwick should be recognised as an advantage and the opportunities realised.

6.7 Other Relevant Policy Documents

6.7.1 There are other more specific planning policy and other associated documents which may be important and relevant to the consideration of particular aspects of the NRP. These are set out below:

DfT Circular 01/2022 - The Strategic Road Network and the delivery of sustainable development (last updated December 2022)

6.7.2 This policy paper explains how National Highways will engage with the planning system and

fulfil its remit to be a delivery partner for sustainable economic growth whilst maintaining, managing and operating a safe and efficient strategic road network. The paper states that the policies may also be considered important and relevant to decisions on nationally significant infrastructure projects (NSIPs) in the absence of a stated position in the relevant national policy statement. This document replaces the policies in the Department for Transport Circular 02/2013 of the same title.

West Sussex Transport Plan 2022-2036 (April 2022)

6.7.3 The West Sussex Transport Plan (WSTP) is the County Council's main policy on transport and supports delivery of West Sussex County Council's Corporate Plan for 2012-2025 and its priorities. The WSTP sets out how the County Council intends to address key challenges by improving, maintaining and managing the transport network in the period up to 2036.

6.7.4 The vision and environmental, social, economic and transport objectives will be delivered through five thematic strategies and area transport strategies for each planning area in West Sussex. The Council's Access to Gatwick Airport Strategy includes supporting initiatives that will increase sustainable transport mode share for passengers and employees and ensure community needs are taken into account.

West Sussex Local Transport Plan 2011-2026 (LTP3) (2011)

6.7.5 West Sussex County Council (WSCC) is currently updating its Local Transport Plan (LTP). The existing West Sussex Local Transport Plan covers the period of 2011-2026 while the new WSTP (WSTP4) will cover all transport policy and implementation of strategies and interventions within West Sussex between 2022 and 2036 (a 15-year period).

6.7.6 The Plan recognises that a successful Gatwick Airport is an important driver for the local economy and that major investment in transport is vital to its success. The County Council states that it is supportive of a one runway, two terminal arrangement at Gatwick.

West Sussex Waste Local Plan (April 2014)

6.7.7 West Sussex County Council and the South Downs National Park Authority have prepared the Plan. It covers the period to 2031 and is the most up-to-date statement of the Authorities' land-use planning policy for waste. It provides the basis for making consistent land-use planning decisions about planning applications for waste management facilities.

6.7.8 The Authorities want the waste that is generated in West Sussex to be dealt with in a sustainable way. To that end, the provision of suitable and well-located new facilities will be enabled to maximise opportunities to reuse, compost, recycle, and treat waste. The Plan states that this new provision will take place in ways that support social and economic progress, protect local communities and protect and enhance the special character and environment of the County. Overall, there will be a continuing decline in the reliance on disposal to land and the aspiration is that there will be 'zero waste to landfill' by 2031.

Surrey Local Transport Plan (LTP4) 2022-2032 (December 2022)

6.7.9 LTP4 aims to significantly reduce carbon emissions from transport to meet the the Council's commitment to net zero emissions by 2050. One of the Council's key objectives is to support Surrey's growth ambitions and enable businesses and people to prosper sustainably and to provide well connected communities that encourage equal access.

Surrey Waste Local Plan 2019-2033 (2020)

6.7.10 The Surrey Waste Local Plan sets out how and where different types of waste will be managed in Surrey in the future. The Vision for waste development in Surrey is to enable sufficient waste management capacity to support Surrey's nationally important economy and to develop the circular economy in Surrey where residents and businesses produce less waste and treat more waste as a resource by re-use, recycling and recovery.

New Directions for Crawley – Crawley's Transport Strategy (March 2020)

6.7.11 New Directions is a developing strategy. It outlines a vision and identifies opportunities for Crawley. A multi-modal transport study will be undertaken alongside developing plans and modelling of options. This will inform development of a detailed action plan for the period to 2030. The strategy recognises that Gatwick Airport is a key influence on local transport, climate and, land use. The Council recognises that it already places some conditions on GAL to encourage modal shift away from car use to rail and bus and increasing walking and cycling, particularly for local staff.

Crawley's Local Cycling and Walking Infrastructure Plan 2021 (LCWIP)

6.7.12 The Plan highlights the need for a high-quality network of safe, practical and attractive cycling and walking routes for Crawley residents and visitors of most abilities that meet shorter journey needs. One of the issues identified in the Plan is the need to address cycling and walking between Horsham and Crawley particularly for commuting to Gatwick Airport. The Plan suggests that safe cycle access to and from the Gatwick Airport station could generate modal shift from cars to rail.

Crawley's Climate Change Action Plan – Action to Zero (November 2021)

6.7.13 The Council has pledged to reduce emissions by at least 50%, and as close to net zero as possible by 2030, and to reach net zero by 2040 at the very latest. It quotes the Gatwick Greenspace initiative as being a resource which is required to develop new and existing natural, biodiverse spaces.

Crawley's Corporate Plan Priorities 2023-2027

6.7.14 One of the Council's corporate priorities is to enable a sustainable economic recovery and to improve job opportunities. To do this, the Council states that it will:

- enable support measures to diversify the local economy and building economic resilience in the borough.
- provide major improvements to the town's infrastructure, including significant sustainable transport enhancements and better business, skills and community facilities.
- unlock pathways to better job opportunities for local residents, by working with employers on apprenticeship schemes.
- continue to work closely with our Local Economic Partnerships to boost sustainable business growth, attract new jobs investment and empower the local resident workforce.
- utilise our place making responsibilities and powers to drive sustainable growth, enhance Crawley as a place to do business and support economic growth.

Crawley's One Town Economic Recovery Plan 2022-2037 (2021)

6.7.15 The Council's One Town Vision for 2050 is based on a 'green growth' economy. As part of this, it identifies Gatwick Airport as needing to be a 'sustainable aviation exemplar'. The Plan's strategic priorities and objectives include:

- **A Diverse and Resilient Economy** - establish Crawley as the key business destination in the Southeast for advanced engineering and professional services.
- **Green Transformation** - deliver vital carbon emissions reductions in Crawley.
- **Skills for the Future** - enable business from high value growth sectors in Crawley to recruit successfully from local workforce and overcome skills gaps including through further upgrade and investment in Crawley's skills and training facilities with a focus on re-skilling and upskilling Crawley's workforce, including higher technical skills.

6.7.16 In addition to the documents listed above, there are a number of other policy documents which may be relevant to the NRP. They have been considered within the environmental assessments within the **ES** and include:

- Crawley Borough Council Planning and Climate Change SPD (2016);
- Crawley Borough Council Green Infrastructure SPD (2016);
- Crawley Borough Council Urban Design SPD (2016);
- West Sussex Joint Minerals Local Plan (July 2018);
- West Sussex Local Flood Risk Management Strategy 2021-2026 (2nd Iteration consultation draft) (August 2021);
- Surrey Minerals Plan Core Strategy (2011b);
- Surrey Minerals Plan Primary Aggregates Development Plan Document (2011c); and
- Surrey Aggregates Recycling Joint Development Plan Document (2013).

7 Assessment Principles

7.1 Introduction

7.1.1 Chapter 4 of the ANPS concerns Assessment Principles and sets out the general policies in accordance with which applications relating to a Northwest Runway at Heathrow Airport are to be decided. As explained earlier in this Statement, the ANPS provides the most relevant policy framework against which to assess the acceptability of the Project and its headings and terms have been used as the structure for this and the next section of the Planning Statement. Similar assessment principles are set out in the NNNPS and these are also referenced below.

7.2 General Principles of Assessment

7.2.1 Paragraph 4.3 of the NNNPS and Paragraph 4.4 ANPS make clear that, in considering any proposed development, and in particular when weighing its adverse impacts against its benefits, the Examining Authority and the SoS will take into account:

- its potential benefits, including the facilitation of economic development including job creation[49] and environmental improvement, and any long term or wider benefits; and
- its potential adverse impacts (including any longer term and cumulative adverse impacts) as well as any measures to avoid, reduce or compensate for any adverse impacts.

7.2.2 In this context, paragraph 4.4 of the NNNPS and paragraph 4.5 of the ANPS explain that environmental, safety, social and economic benefits and adverse impacts should be considered at national, regional and local levels. These matters are considered in Section 8 against the framework provided by the ANPS.

7.2.3 Paragraph 4.5 of the ANPS further states that the SoS will also have regard to the manner in which the benefits of a project are secured, and the level of confidence in their delivery. The Application's approach to identifying and securing any necessary mitigation is explained at Section 5 of this Statement.

7.2.4 Paragraph 4.5 of the NNNPS requires that road projects will normally be supported by a business case prepared in accordance with Treasury Green Book principles. The business case provides the basis for investment decisions on roads. The business case will normally be developed based on the Department's Transport Business Case guidance and WebTAG guidance. The economic case prepared for a transport business case will assess the economic, environmental and social impacts of a development. The information provided will be proportionate to the development. This information will be important for the Examining Authority and the SoS's consideration of the adverse impacts and benefits of a proposed development.

7.2.5 These principles apply to the case for public sector promoted road projects, where the

[49] Paragraph 4.3 of the NNNPS includes housing as a potential benefit

business case would identify the value for money of the project using standard Treasury metrics. In this case, whilst GAL has liaised closely with National Highways, the highway works proposed are currently expected to be funded by GAL. The case for the highway works is explained fully in Chapter 13 of the **Transport Assessment** (Doc Ref. 7.4).

7.2.6 Paragraph 4.6 of the NNNPS states that applications for road projects should usually be supported by a local transport model to provide sufficiently accurate detail of the impacts of a project. The local transport model which considers the proposed highway works is set out fully in the **Transport Assessment** at Chapters 12 and 13.

7.2.7 Paragraphs 4.9 in the ANPS and the NNNPS state that the Examining Authority should only recommend, and the SoS will only impose, requirements in relation to a development consent, that are necessary, relevant to planning, relevant to the development to be consented, enforceable, precise, and reasonable in all other respects. The Requirements proposed in this case are set out in Schedule 2 of the **draft DCO** (Doc Ref. 2.1) and have been formulated taking direct account of the principles set out in the ANPS.

7.2.8 Paragraph 4.9 of the ANPS states that the need for requirements in respect of the phasing of a scheme is likely to be an important consideration, so that effects of construction and operational phases are properly mitigated, as well as any changes in the operations of the airport that may occur in line with the phasing of physical works and commencement of operations. The **Indicative Construction Sequencing** for the Project is provided in **ES Appendix 5.3.3** (Doc Ref. 5.3) and any necessary control in their respect is secured by the terms of the DCO Requirements.

7.2.9 The DCO requires that GAL uses reasonable endeavours to obtain a provisional certificate from National Highways in respect of the national highway works within three years of the commencement of dual runway operations, unless otherwise agreed. This requirement is designed to ensure that the highway improvements are in place and open to the public within a short period of the northern runway coming into commercial use, to mitigate the effect on the highway network of increasing air transport movements.

7.2.10 The DCO also secures the delivery of two environmental features with specific sequencing requirements. The first of these is secured through the delivery of a replacement open space implementation plan that will set out the timeframe for the delivery of replacement open space in relation to the construction works which will result in the removal of open space. This plan must have been approved before any open space is acquired. The second is secured through a flood compensation delivery plan which will set out the timeframe for delivery of the flood compensation features in relation to works in flood zone 3 (accounting for climate change). The plan must be approved before specified works in the flood plain can be carried out.

7.2.11 These plans both allow for the future agreement of the timescales of delivery of the mitigation features to reflect the specific impacts which they would mitigate. As the construction programme and sequence evolves it will be clearer at what point in time these mitigation measures are required to be in place.

7.2.12 Paragraphs 4.10 in the ANPS and the NNPS further state that obligations under Section 106 of the Town and Country Planning Act 1990 should only be sought where they are necessary to make the development acceptable in planning terms, directly related to the proposed

development, and fairly and reasonably related in scale and kind to the development. These principles have directly informed the formulation of the draft Section 106 Heads of Terms in Table 5.2 of this statement.

7.3 Environmental Impact Assessment

7.3.1 Paragraph 4.12 of the ANPS and paragraph 4.15 of the NNNPS state that all proposals that are subject to the European Union's Environmental Impact Assessment Directive and are likely to have significant effects on the environment, must be accompanied by an ES, describing the aspects of the environment likely to be significantly affected by the project. The DCO is supported by an **ES** (Doc Ref. 5.1) which, in accordance with the Directive, and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017(the "EIA Regulations") identifies, describes and assesses the effects on human beings, fauna and flora, soil, water, air, climate, the landscape, material assets and cultural heritage, and the interaction between them. In accordance with Regulation 14 and Schedule 4 of the EIA Regulations, it also includes a description of the likely significant effects of the proposed project on the environment, covering the direct effects and any indirect, secondary, cumulative, short-, medium- and long-term, permanent and temporary, positive and negative effects of the project, and also the measures envisaged for avoiding or mitigating significant adverse effects.

7.3.2 Paragraph 4.13 states that, when examining a proposal to which the ANPS applies, the Examining Authority should ensure that likely significant effects at all stages of the project have been adequately assessed. The effects of any changes in operations, including the number of air traffic movements, during the construction and operational phases must be properly assessed and appropriate mitigation secured for any significant effects. These matters are addressed in the **ES** submitted with this DCO as are the cumulative effects which are assessed in line with paragraph 4.14 of the ANPS and paragraph 4.16 of the NNNPS. These paragraphs state that when considering significant cumulative effects, any ES should provide information on how the effects of an applicant's proposal would combine and interact with the effects of other development (including projects for which consent has been granted, as well as those already in existence if they are not part of the baseline). This assessment is found in **ES Chapter 20: Cumulative Effects and Inter-Relationships** (Doc Ref. 5.1).

7.3.3 Paragraphs 4.16 in the ANPS and 4.18 in the NNNPS state that, in cases where it may not be possible at the time of the application for development consent for all aspects of the proposal to have been settled in precise detail, the applicant should explain in its application which elements of the proposal have yet to be finalised, and the reasons why this is the case (see Section 5 of this Planning Statement). In accordance with paragraph 4.17 of the ANPS and paragraph 4.19 of the NNNPS, effort has been made by the Applicant to refine the detail of the Proposed Development. However, and because certain details are still to be finalised, **ES Chapter 6: Approach to Environmental Assessment** (Doc Ref 5.1) sets out the relevant design parameters used for the assessment. It explains, with reference to the design parameters, what the maximum extent of the proposed development may be and assesses the potential adverse effects which the project could have, to ensure that the impacts of the project as it may be constructed have been properly assessed. In accordance

with paragraph 4.18 of the ANPS and paragraph 4.20 of the NNNPS, the expectation is that, should the SoS decide to grant development consent for an application where details are still to be finalised, such as in the case here, that this will need to be reflected in appropriate development consent requirements in the development consent order – and indeed, the draft DCO submitted with the application includes such requirements.

7.4 Habitats Regulations Assessment

7.4.1 Paragraph 4.19 of the ANPS and paragraph 4.22 of the NNNPS state that, prior to granting development consent, the SoS must consider under the Habitats Regulations whether it is possible that the project could have a significant effect on a European site or a European offshore marine site or any other site to which the same protection is applied as a matter of policy (either alone or in combination with other plans or projects), and is not connected with or necessary to the management of that site. In those circumstances, the SoS must make an Appropriate Assessment of the implications for the site in view of the site's conservation objectives. Paragraph 4.20 of the ANPS and paragraph 4.23 of the NNNPS state that the Applicant is required to provide sufficient information with their applications for development consent to enable the SoS to carry out an Appropriate Assessment if required. This information should include details of any measures that are proposed to minimise or avoid any likely significant effects on a European site. The information provided may also assist the SoS in concluding that an Appropriate Assessment is not required because significant effects on European sites are sufficiently unlikely that they can be excluded.

7.4.2 The **Habitats Regulations Assessment Report** is provided as **ES Appendix 9.9.1** (Doc Ref. 5.3). It provides the necessary information for the SoS for Transport to undertake a Habitats Regulations Assessment (HRA) under the Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations').

7.5 Equalities

7.5.1 Paragraph 4.27 of the ANPS and paragraph 3.21 of the NNNPS state that Applicants have a duty to promote equality. **ES Chapter 18: Health and Wellbeing** (Doc Ref. 5.1) considers inequalities.

7.6 Assessing Alternatives

7.6.1 Paragraph 4.28 of the ANPS and paragraph 4.26 of the NNNPS require that the Applicant should comply with all legal obligations and policy on the assessment of alternatives. In particular, the NPSs recognises that the Environmental Impact Assessment Directive requires projects with significant environmental effects to include a description of the reasonable alternatives studied by the Applicant which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the significant effects of the project on the environmental effects. This is set out in **ES Chapter 3: Alternatives Considered** (Doc Ref. 5.1).

7.6.2 Specifically, and with reference to paragraph 4.27 of the NNNPS, the highways NSIPs have been the subject of proportionate option consideration of alternatives. Details are provided in **ES Chapter 3: Alternatives Considered** (Doc Ref. 5.1) and **ES Appendix 3.5.2: Highways**

Improvements Options Development – North Terminal Roundabout (Doc Ref. 5.3).

7.7 Criteria for 'good design' for airports and national network infrastructure

7.7.1 In accordance with paragraph 4.29 on the ANPS and paragraphs 4.28 and 4.29 of the NNNPS, design has been an integral consideration from the outset of the proposal and visual appearance has also been an important factor in considering the scheme design, as well as functionality, fitness for purpose, sustainability and cost (paragraph 4.30 of the ANPS and 4.29 of the NNNPS).

7.7.2 Both NPSs state that applying 'good design' to airports projects and national network projects should produce sustainable infrastructure sensitive to place, efficient in the use of natural resources and energy used in their construction, and matched by an appearance that demonstrates good aesthetics as far as possible. The **Design and Access Statement** sets out the design approach that has been taken and explains how full account has been taken of paragraphs 4.31 of the ANPS and NNNPS which state that good design should meet the principal objectives of the scheme by eliminating or substantially mitigating the identified problems by improving operational conditions and simultaneously minimising adverse impacts.

7.7.3 Paragraphs 4.32 in the ANPS and NNNPS state that the SoS will need to be satisfied that projects are sustainable and as aesthetically sensitive, durable, adaptable and resilient as they can reasonably be, having regard to regulatory and other constraints and including accounting for natural hazards such as flooding. Paragraphs 4.33 in the ANPS and NNNPS state that the scheme should take into account, as far as possible, both functionality, including fitness for purpose and sustainability, and aesthetics, including the scheme's contribution to the quality of the area in which it would be located. This is also addressed in the **Design and Access Statement** (Doc Ref. 7.3) in addition to an explanation of how the design process was conducted and how the proposed design evolved (paragraphs 4.35 in the ANPS and the NNNPS).

7.7.4 It is noted that the Examining Authority and SoS will take into account the ultimate purpose of the infrastructure and bear in mind the operational, safety and security standards which the design has to satisfy (paragraphs 4.35 in the ANPS and NNNPS).

7.8 Costs

7.8.1 Paragraph 4.39 of the ANPS states that the Applicant should demonstrate in its application that its scheme is cost efficient and sustainable, and seeks to minimise costs to airlines, passengers and freight owners over its lifetime. Whilst this is relevant primarily to the Heathrow Northwest Runway, the Applicant has set out the relevant details applicable to the Project in the **Funding Statement** (Doc Ref. 3.1).

7.9 Climate Change Adaptation

7.9.1 Paragraph 4.43 of the ANPS and paragraph 4.38 of the NNPS state that adaptation is necessary to deal with the potential impacts of the climate change changes that are already happening. They require new development to be planned to avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought

forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the provision of green infrastructure. Paragraph 4.45 of the ANPS and paragraph 4.40 of the NNNPS require applicants to consider the impacts of climate change when planning location, design, build and operation. Any accompanying ES should set out how the proposal will take account of the projected impacts of climate change. This information is contained in **ES Chapter 15: Climate Change** (Doc Ref. 5.1) which also considers appropriate mitigation or adaptation measures as required by paragraphs 4.49, 4.50 and 4.51 on the ANPS and paragraphs 4.43, 4.44 and 4.45 of the NNNPS.

7.10 Pollution Control and Other Environmental Protection Regimes

7.10.1 Issues relating to discharges or emissions from a proposed project which affect air quality, water quality, land quality or the marine environment, or which include noise, may be subject to separate regulation under the pollution control framework or other consenting and licensing regimes.

7.10.2 Paragraph 4.53 of the ANPS and paragraph 4.48 of the NNNPS states that relevant permissions will need to be obtained for any activities within the development that are regulated under those regimes before the activities can be operated. The DCO Application includes a **List of Other Consents and Licences** (Doc Ref. 7.5) detailing the other consents and licences required.

7.10.3 Paragraph 4.54 of the ANPS and 4.50 of the NNNPS state that, in deciding an application, the SoS should focus on whether the development is an acceptable use of the land, and on the impacts of that use, rather than the control of processes, emissions or discharges themselves. The SoS should assess the potential impacts of processes, emissions or discharges to inform decision making, but should work on the assumption that, in terms of the control and enforcement, the relevant pollution control regime will be properly applied and enforced. Decisions under the Planning Act 2008 should complement but not duplicate those taken under the relevant pollution control regime.

7.10.4 Paragraph 4.59 of the ANPS and paragraph 4.56 of the NNNPS make clear that the SoS should not refuse consent on the basis of regulated impacts unless there is good reason to believe that any relevant necessary operational pollution control permits or licences or other consents will not subsequently be granted.

7.11 Common Law Nuisance and Statutory Nuisance

7.11.1 Paragraph 4.61 of the ANPS and paragraph 4.58 of the NNNPS state that, during the examination of an application for development consent, possible sources of nuisance under Section 79(1) of the Environmental Protection Act 1990 and under Sections 76 and 77 of the Civil Aviation Act 1982 should be considered by the Examining Authority. The Examining Authority should also consider how those sources of nuisance might be mitigated or limited so they can recommend appropriate requirements that the SoS might include in any subsequent order granting development consent. A **Statement of Statutory Nuisances** is submitted with the DCO (Doc Ref. 7.6). It concludes that with mitigation in place, none of the statutory nuisances identified in Section 79(1) of the Act is predicted to arise.

7.12 Safety

7.12.1 Paragraph 4.61 of the NNNPS states that the Applicant should undertake an objective assessment of the impact of the proposed development on safety including the impact of any mitigation measures and that this should use the methodology outlined in the guidance from DfT (WebTAG) and from the Highways Agency. Paragraph 4.62 states that arrangements should also be put in place for a road safety audit process. Paragraph 4.66 states that the SoS should not grant development consent unless satisfied that all reasonable steps have been taken and will be taken to minimise the risk of road casualties arising from the scheme; and contribute to an overall improvement in the safety of the Strategic Road Network. Safety has been considered throughout the development of the design of the surface access highway works and has been a key component of discussions to date with National Highways and the local highway authorities. The **Scheme Development Report** (Consultation Report Appendices – Part B, B.16 Preliminary Environmental Information Report, PEIR Appendix 12.9.1 Part 4 (Doc Ref 6.2)) and the **Summer 2022 Consultation Document** (Consultation Report Appendices – Part C, C.1 Consultation Document (Doc Ref 6.2)) set out the key safety considerations that influenced the highways optioneering process and preliminary design proposals. The scheme will build on safety activities undertaken to date through the detailed design stage including the Road Safety Audits in line with DMRB and local highway authority requirements.

7.13 Security Considerations

7.13.1 Paragraph 4.64 of the ANPS recognises that the nature of the aviation sector as a target for terrorism means that security considerations will likely apply in the case of the infrastructure project for which development consent may be sought under the Airports NPS. Similarly, paragraph 4.74 of the NNNPS recognises that national networks could be similar targets.

7.13.2 Paragraph 4.65 of the ANPS and paragraph 4.76 of the NNNPS state that where national security implications have been identified, the Applicant should consult with relevant security experts from the Centre for the Protection of National Infrastructure and the Department for Transport to ensure that physical, procedural and personnel security measures have been adequately considered in the design process, and that adequate consideration has been given to the management of security risks. This is discussed in the **Design and Access Statement** (Doc Ref. 7.3) and the **Major Accidents and Disasters** report provided as **ES Appendix 5.3.4 to Chapter 5: Project Description** (Doc Ref. 7.3).

7.14 Health

7.14.1 Paragraph 4.72 of the ANPS and paragraph 4.81 of the NNNPS require that where the proposed project has likely significant environmental impacts that would have an effect on human beings, any ES should identify and set out the assessment of any likely significant health impacts. Paragraph 4.73 of the ANPS and paragraph 4.82 of the NNNPS state that the Applicant should identify measures to avoid, reduce or compensate for adverse health impacts as appropriate and that the cumulative impact on health should be considered. These matters are detailed in **ES Chapter 18: Health and Wellbeing** (Doc Ref. 5.1).

7.15 Accessibility

7.15.1 Paragraph 4.76 requires the Applicant to include clear details of how plans will improve access on and around the airport by designing and delivering schemes that address the accessibility needs of all those who use, or are affected by, surface access infrastructure, including those with physical and/or mental impairments as well as older users. The Airports NPS recognises that easy access and car parking provision at the airports is essential to this goal and must meet standards set down in guidance (such as the Department for Transport's Inclusive Mobility).

7.15.2 Paragraph 3.20 of the NNNPS states that the Government expects Applicants to improve access, wherever possible, on and around the national networks by designing and delivering schemes that take account of the accessibility requirements of all those who use, or are affected by, national networks infrastructure, including disabled users. All reasonable opportunities to deliver improvements in accessibility on and to the existing national road network should also be taken wherever appropriate.

7.15.3 This is discussed in Chapter 14 of the **Transport Assessment** which is submitted with the DCO (Doc Ref. 7.4).

7.16 Assessment of Impacts

7.16.1 Chapter 5 of the ANPS and of the NNNPS concern the Assessment of Impacts and how this should take place.

7.16.2 Paragraph 5.1 of the ANPS confirms that the chapter focusses on the potential impacts of the Heathrow Northwest Runway scheme, the assessments that any applicant will need to carry out, and the specific planning requirements that they will need to meet, in order to gain development consent. It is reasonable to assume that the general requirements set out in the chapter will equally be important and relevant to the consideration of other nationally significant airport infrastructure projects and, accordingly, it is appropriate to use the structure and principles of those requirements as the principal policy framework against which to consider the aviation related aspects of the NRP application. This is the approach adopted in the next section of this Statement.

7.16.3 Paragraph 5.2 of the ANPS notes that in its Final Report, the Airports Commission recommended that, to make airport expansion possible (at Heathrow), a comprehensive package of accompanying measures should be provided to make the airport's expansion more acceptable to the local community and that there was a need for measures to mitigate the impacts of increased capacity and to enhance beneficial effects (paragraphs 5.2 and 5.3).

7.16.4 GAL has proposed a comprehensive mitigation package alongside the proposals for development which is detailed in the **ES Appendix 5.2.3 Mitigation Route Map** document (Doc Ref. 5.3) submitted with the DCO application.

8 Planning Assessment

8.1 Introduction

8.1.1 This section provides an assessment of the Project against the relevant aviation, networks and planning policies set out in Section 6 of this Statement.

8.1.2 The determination of the DCO application is being made in the absence of a directly applicable aviation NPS and in accordance with Section 105 of the Act but, in respect of the highway works, in accordance with a directly applicable NPS and, therefore, in accordance with Section 104 of the Act.

8.1.3 However, whilst the ANPS does not directly have effect for the purposes of Section 104, it is both important and relevant to the proposals and its policy tests provide the most relevant framework against which to test and assess the acceptability of the aviation components of the application and the Project as a whole.

8.1.4 Accordingly, this section of the Planning Statement uses the framework of policies set out in both NPSs where appropriate to consider the application proposals.

8.1.5 Each of the environmental topics considered in this Section has been the subject of its own detailed assessment either as part of the **ES** (Doc Ref. 5.1) and/or separate standalone documents submitted with the DCO application. The conclusions of those assessments are drawn upon in this Statement in the context of relevant national aviation and networks policy and national, regional and local planning policy.

8.1.6 Planning Policy Compliance Tables are provided in **Appendix C** of this Statement.

8.1.7 The topics that are considered are those set out in Chapter 5 of the ANPS (and Chapter 5 of the NNNPS where relevant), supplemented by a consideration of the principle of the development and other additional headings highlighted in bold below:

- **Principle of Development**
- **Socio-Economic Development**
- Surface Access and Impacts on Transport Networks
- Air Quality
- Noise and Vibration
- Carbon Emissions, Climate Change and Greenhouse Gases
- Biodiversity and Ecological Conservation
- Agricultural Land Use and Recreation
- Waste Management
- Flood Risk
- Water Environment (Water Quality and Resources)
- Historic Environment
- Landscape, Townscape and Visual Resources (Visual Impacts)
- Geology and Ground Conditions
- Dust, Odour, Artificial Light, Smoke and Steam
- **Major Accidents and Disasters**
- **Health and Wellbeing**
- **Sustainability**
- Community Compensation

- Community Engagement

8.2 Principle of Development

Policy Context

8.2.1 The policy framework relevant to the principle of increasing the capacity of Gatwick Airport is set out in Section 6 of this Statement. Relevant policies concerning the need for the development are also set out in Chapter 3 of the **Needs Case** (Doc Ref. 7.2). Those policies evidence the Government's commitment to growth in the aviation sector due to its national importance, subject to the acceptability of its environmental effects. The performance of the Project against planning and environmental policies is considered further below. In principle, however, the Project benefits from strong and up to date national policy support.

8.2.2 The principle of enhancing the strategic road network to enhance access to airports is established in Section 2 of the NNNPS and not considered further under this heading. [50]

Assessment

8.2.3 In the case of Gatwick Airport, the NRP proposes to increase the capacity of the airport by making better use of the existing northern standby runway and other airport facilities. In order to achieve that, various infrastructure works are necessary including a shift in the centre line of the northern runway. This involves:

- building a 12m wide strip along the northern side of the runway so as to enable the reposition of its centre line 12m further north, to ensure a centre line separation of 210m between it and the main runway.
- removal of the redundant 12m strip to the south of the altered northern runway.

8.2.4 The NRP is an innovative means of achieving a significant increase in capacity at Gatwick without the provision of a wholly new runway or the land take or physical effects that might normally be associated with the construction of an additional runway. The proposals benefit from direct policy support from a range of national policy documents including Beyond the Horizon – the future of UK aviation – making best use of existing runways, June 2018. Some representations have been received in response to consultation, however, that the proposals are altering and re-providing the runway, rather than "making best use" of the existing runway. It has also been suggested that the policy of making best use (MBU) does not apply to Gatwick. In case it may be suggested that this amounts to some form of conflict with policy or absence of policy support, that issue is addressed here.

8.2.5 The relevant background starts with the Aviation Policy Framework, which was in place even before the Airports Commission was established to look at aviation capacity in the South-East. Like several of the aviation policy documents, the APF uses the term "*make best use of existing runway capacity*" as well as best use of "*existing airport capacity*" (page 10 and paragraph 1.24). Paragraph 1.60 makes clear the policy support for making "*best use of*

[50] The question of the need for improvements to the strategic road network is established in the NNNPS and explained in Section 6 of this Statement.

existing airport capacity to improve performance, resilience and passenger experience". The two phrases are used interchangeably but the intention is clear – to create additional aviation capacity.

8.2.6 The APF explains (at paragraph 2) that the Airports Commission was established in September 2012 with the remit of recommending how the UK can '*maintain its status as a global aviation hub and maintain our excellent international connectivity for generations to come, as well as making best use of our existing capacity in the shorter term'*.

8.2.7 Consistent with its instruction, the Interim Report of the Airports Commission identified a requirement for a full new runway in the South-East of England by 2030 but recognised that would provide a longer-term addition to capacity and that, in the meantime, the Commission's remit also required it to look at how to make best use of existing airport infrastructure, before new capacity became operational.[51]

8.2.8 In its final report, the Airports Commission confirmed this approach. It recognised that there was a decision to be made by Government about the appropriate location for a new runway (Heathrow or Gatwick) but that:

> "16.40 *Irrespective of how the government responds to the recommendations set out in in this report a new runway might not open for at least 10 years. It is imperative that the UK continues to grow its domestic and international connectivity in this period, and this will require the more intensive utilisation of existing airports other than Heathrow and Gatwick*".
>
> "16.41 *The capacity constraint at Heathrow and Gatwick represent an opportunity for other UK airports in the coming decade*." [52]

8.2.9 The question of whether or not making better use (MBU) applies to Gatwick is considered further below but it is apparent that both the APF and the Airports Commission were concerned with the importance of increasing aviation capacity and that there is nothing to suggest that this would not embrace making innovative use or alterations to existing standby runways.

8.2.10 The ANPS confirms this approach. It explains the work of the Airports Commission from paragraph 2.28, i.e. pending the operation of a new runway, it was considered imperative that the UK continues to grow its domestic and international connectivity, which would require more intensive use of existing airports (other than Heathrow and Gatwick). The reference to Heathrow and Gatwick reflected how the ANPS addressed the debate between the two airports as candidates for a full new runway.

8.2.11 The ANPS, of course, settled the debate about whether a full new runway should be provided at Heathrow or Gatwick – the north-west runway at Heathrow was identified as the one additional runway which needed to be in operation by 2030.

8.2.12 At paragraph 1.42, the ANPS again uses the words "*existing runways*" and "*existing*

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[51] https://www.gov.uk/government/publications/airports-commission-interim-report

[52] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/440316/airports-commission-final-report.pdf. At the time, the only option relating to Gatwick was an entirely new runway to the south.

infrastructure" interchangeably but this time (having reported its support for the third runway at Heathrow) does not exclude Gatwick from the policy encouragement to intensify use and capacity at existing airports.

8.2.13 Again, the terms are used interchangeably in the policy document *Beyond the Horizon*, despite its shorthand title. Paragraph 1.2 make clear the importance of airports making best use of existing capacity and existing infrastructure. Paragraph 1.5 explains that the policy approach now is only different in relation to Heathrow (not Gatwick), given that the ANPS designates Heathrow for an additional runway (to which the ANPS has effect). Paragraph 1.25 is also clear that the position is different only in respect of Heathrow. There is nothing in MBU that otherwise restricts growth at existing airports or directs it to some existing airport infrastructure and not others.

8.2.14 Similarly, the policy position as set out in Flight Path to the Future is straightforward:

> "*It is also essential that we utilise existing airport capacity in a way that delivers for the UK, putting the needs of users first and supporting our aims to enhance global connectivity. A competitive, modern, and efficient sector for the future, that makes the best use of capacity will be delivered through recognising where changes may be needed and taking steps to address them*." (Page 18).

8.2.15 The application, of course, doesn't just make best use of existing infrastructure, it involves investment in additional infrastructure in order to enhance the capacity and efficiency of the airport. However, that is likely to be the case with any application for making better use of an existing airport – indeed there would be no requirement for the policy if it did not contemplate the granting of consent for such investment.

8.2.16 In case there may be any doubt about this, this position was confirmed by the SoS in his only recent decision on airport capacity: the proposals at Manston Airport. As the SoS concluded there:

> "*The aviation sector in the UK is largely privatised and operates in a competitive international market and, as set out in paragraph 8 of the Executive Summary (of the APF) Government continues to welcome significant levels of private investment in airport infrastructure. The APF recognises that maintaining the UK's international connectivity is a complex and contentious one, but solving it is crucial to securing the UK's long-term economic growth* (Aviation Policy Framework Executive Summary, paragraph 24)." [53]

8.2.17 The need for this approach, of course, is made all the more urgent by the delay in the delivery of a third runway at Heathrow Airport. Indeed, the SoS's decision at Manston Airport made clear that it would not be appropriate to rely on the assumption that a third runway will necessarily be constructed at Heathrow (Manston decision paragraphs 97-102). At Manston it was also alleged that the MBU policy did not apply because Manston was not included in the calculations that sat behind the MBU policy set out in Beyond the Horizon. At

[53] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-006369-220818%20-%20Manston%20Airport%20PA08%20Decision%20Letter.pdf (Paragraph 48)

paragraph 71 of the decision letter, the SoS made clear that MBU was an important policy principle that was not limited to forecasts that underpinned the MBU policy. He also recognized that the delays in the provision of a new runway at Heathrow offer the potential to improve the need case for that development (paragraph 96).

8.2.18 Any question of insufficient capacity for the NRP in the context of MBU policies should be seen in this light, i.e., the unequivocal policy support for the principle of making best use of airport capacity, as well as the increased urgency brought about by the delay in the delivery of a new runway at Heathrow.

8.2.19 In terms of overall capacity, the modelling undertaken for the Jet Zero Strategy is helpful. The Jet Zero: Modelling Framework was published in March 2022 and it made clear that its capacity assumptions include current planning applications, and proposed applications including proposals on which airports have consulted, but not yet submitted. Annex D demonstrates that this includes the full capacity of the NRP, which is assumed to increase the capacity at Gatwick Airport to 386,000 ATMs by 2050. The Modelling Framework then explains:

> "*3.18 In June 2018, the Government set out its policy support for airports to make best use of their existing runways in Beyond the Horizon: The Future of UK Aviation: Making Best Use of Existing Runways "MBU") and a new runway at Heathrow Airport in the ANPS, subject to related economic and environmental considerations. In common with the Jet Zero Consultation, the capacity assumptions in our modelling reflect and are aligned with these policies."*

8.2.20 The capacity assumptions align with the demand forecasts set out in the Jet Zero illustrative scenarios and sensitivities, published in July 2022. And it is those overall forecasts and capacities which the Jet Zero Strategy explains are aligned with its trajectory to net zero.

Planning Policy Compliance

8.2.21 The principle of the development proposed in the application complies directly with up to date national policy for aviation by adding capacity in the South-East and by making best use of existing airport infrastructure.

8.3 Socio-Economic Development and Skills

Policy Context

8.3.1 Socio-economics is also not a heading within the ANPS. Nevertheless, the findings of the Project's socio-economic assessment as presented in **ES Chapter 17: Socio Economic** (Doc Ref. 5.1) and the **Needs Case** (Doc Ref. 7.2) provide helpful context against which to consider other aspects of the Project.

8.3.2 Paragraph 4.4 of the ANPS states that, in considering any proposed development, and in particular when weighing its adverse impacts against its benefits, the Examining Authority and the SoS will take into account its potential benefits, including the facilitation of economic development (including job creation) and environmental improvement, and any long term or wider benefits. Paragraph 4.5 of the ANPS states that social and economic benefits should be considered at a national, regional and local level and that the SoS will have regard to the

manner in which such benefits are secured, and the level of confidence in their delivery. This requirement is broadly repeated in paragraph 4.4 of the NNNPS.

8.3.3 Paragraph 5.266 of the ANPS relates to 'skills' and states that the Government expects the Applicant to maximise the employment and skills opportunities for local residents, including apprenticeships.

8.3.4 Paragraph 4.5 of the NNNPS requires applications for road projects to be supported by a business case and for the economic case prepared for the business case to assess the economic, environmental and social impacts of a development. The information provided should be proportionate to the development.

8.3.5 Achieving sustainable development underpins the NPPF. Paragraph 8 explains how there are three overarching objectives for the planning system to achieve sustainable development - economic, social and environmental. The economic objective is to help build a strong, responsive and competitive economy, by (amongst other things) ensuring innovation and improved productivity and by identifying and coordinating the provision of infrastructure. The social objective is to support strong, vibrant and healthy communities, by (amongst other things) reflecting current and future needs and supporting communities' health, social and cultural well-being.

8.3.6 The environmental objective is concerned with protecting and enhancing our natural, built and historic environment through making effective use of land, minimising waste, mitigating and adapting to climate change including moving to a low carbon economy. The Project's performance against these aims is reported later in this Section.

8.3.7 Section 6 of the NPPF is about building a strong, competitive economy. Paragraph 81 in particular states that planning decisions should help create the conditions in which businesses can invest, expand and adapt. It states that 'significant weight' should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. It continues by saying that the approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future and that this is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.

8.3.8 It is clear from the analysis of the Government's policy on aviation (Section 6 of this Planning Statement) that aviation continues to play a key role in supporting the Government's economic growth agenda[54]. In preparing for the future, the Government wants the UK aviation sector to have the skills to remain one of the strongest aviation sectors in the world supporting economic growth and jobs throughout the UK.[55]

8.3.9 From a regional perspective, Gatwick Airport underpins the success of the Gatwick Diamond economy and is one of the key growth catalysts for the region, attracting business and employers, generating jobs and driving commerce. Gatwick is a gateway for trade, a national asset and the single biggest employment and business hub in the LEP area. Gatwick creates

[54] Page 20 - DfT 'Flightpath to the Future' (2022) - Flightpath to the future (publishing.service.gov.uk)
[55] Page 53 – DfT 'Flightpath to the Future' (2022) - Flightpath to the future (publishing.service.gov.uk)

the principal opportunity for growing the LEP area's economy. Its growth is helpful in realising the regional economic visions which are built on the success that the airport has already brought to the area.

8.3.10 At a local level, Crawley Borough Council and other neighbouring authorities recognise that Gatwick Airport is important as it supports the economic growth of their districts, and it is a main employment area. Its influence and impacts in terms of its social and economic impacts extend far beyond its boundaries into the Gatwick/Crawley sub-region.

8.3.11 The economic benefits of the Project are summarised in Section 3 of this Statement and are set out in more detail in the following reports:

- **National Economic Impact Assessment** which is provided as Appendix 1 to the **Needs Case** (Doc Ref. 7.2)
- **The Economic Impacts of Gatwick Airport: A Report by Oxford Economics** which is provided as Appendix 2 to the **Needs Case** (Doc Ref. 7.2)
- **Local Economic Impact Assessment** which is provided in **ES Appendix 17.9.2**

Assessment

8.3.12 ES **Chapter 17: Socio-Economic** (Doc Ref. 5.1) provides an assessment of the potential socio-economic effects of the Project during the construction and operation periods. Socio-economics is a broad topic that includes the assessment of a range of effects including on employment, the labour market, population and housing, disruption to businesses and residents, impacts on community infrastructure and community cohesion. A full list of the potential effects that have been considered in the socio-economic assessment is provided in **Table 17.4.1** in **ES Chapter 17: Socio-Economic** (Doc Ref. 5.1).

8.3.13 The assessment has been informed by the conclusions of other chapters in the **ES** (Doc Ref. 5.1) including:

- ES Chapter 12: Traffic and Transport;
- ES Chapter 14: Noise and Vibration;
- ES Chapter 18: Health and Wellbeing; and
- ES Chapter 19: Agricultural Land Use and Recreation.

8.3.14 A number of study areas for the assessment have been defined based on the geographical extent within which potentially significant effects on socio-economic receptors might reasonably be predicted to arise as a result of the Project. These are described in **Section 17.4** in **ES Chapter 17** (Doc Ref. 5.1).

8.3.15 A number of measures have been designed into the Project to reduce the potential for socio-economic impacts and to enhance the potential benefits. These include the following:

- **Code of Construction Practice (CoCP)** – this would ensure construction contractors and processes follow practices that minimise adverse effects associated with the construction of the Project (provided in **ES Appendix 5.3.2)** (Doc Ref. 5.3)
- **Outline Construction Traffic Management Plan (CTMP)** – a traffic management strategy would be put in place during the construction period (provided in Annex 3 of **ES Appendix 5.3.2)** (Doc Ref. 5.3)

- **Outline Construction Workforce Travel Plan** – to manage construction workforce travel arrangements (provided in Annex 2 of **ES Appendix 5.3.2)** (Doc Ref. 5.3)
- **Outline Landscape and Ecology Management Plan (oLEMP) -** this will be secured via a requirement in the **draft DCO** (Doc Ref. 2.1). It will secure areas for environmental mitigation and replacement open space which would benefit the local community. The oLEMP is provided as **ES Appendix 8.8.1** (Doc Ref. 5.3)
- **Employment, Skills and Business Strategy (ESBS)** – the Project includes the adoption of the (ESBS) specifically to maximise economic benefits for communities and businesses by creating the conditions for sustainable employment, skills development and career progression and enhancements to the productivity and growth of businesses. These measures would enhance the potential employment and labour market impacts of the Project in both construction and operational periods. The **ESBS** can be found in **ES Appendix 17.8.1** (Doc Ref. 5.3).

8.3.16 The assessment shows that the Project would generate additional construction jobs which can be fulfilled by the existing and projected labour supply within the labour market. The construction workforce peak is expected to be around 1,350 workers.

8.3.17 The Project is expected to generate some disruption to business and residents during construction (for example through changes to traffic and noise levels); however, apart from some limited short-term construction noise effects during the day, no significant adverse impacts are expected in any cases. None of the construction compounds are expected to directly disrupt businesses. Construction traffic is expected to be relatively localised with non-significant effects on driver delay, pedestrian and cycling amenities, and accidents and safety during this period. Passenger crowding would be increased during this period primarily due to the incremental growth in passenger numbers and those of the Project construction workforce who travel to site by rail. However, there is capacity in the current public transport to accommodate the forecast increase. A small number of residents will be affected by construction noise but the majority would be eligible to take part in the Construction Noise Insulation Scheme. The introduction of a temporary construction workforce linked to the Project has the potential to increase demand for community facilities for the period that the temporary workforce remain in the area. Any open space lost by the Project will be fully re-provided.

8.3.18 The Project is not expected to increase the need for housing above that which is already planned for by neighbouring local authorities. The introduction of a temporary construction workforce could lead to a temporary increase in the need for housing – in the form of temporary accommodation – as some construction workers may choose to live locally while working on the Project. To reduce the need for locally based accommodation, a Travel Plan would be developed to encourage workers to travel from their permanent place of residence to work through initiatives such as subsidised travel. The **Assessment of Population and Housing Effects** in **ES Appendix 17.9.3** (Doc Ref. 5.3) outlines that it is unlikely that the Project would place pressure on the housing supply across the study area as a whole, or that an uplift in housing would be needed to increase the labour supply in response to the operational employment generated by the Project. This is because the labour supply which is expected to be generated based on planned housing growth is likely to be sufficient (indeed it is anticipated to provide a substantial surplus) when compared with the labour supply that is needed to support the forecasted job growth. This would leave a surplus of labour which is

available to fill additional job growth in the labour market, such as that generated by the Project, without impacting on the need or demand for housing. The amount of affordable housing need associated with the Project is unlikely to place any further upward pressure on affordable housing delivery beyond pressures that already exist.

8.3.19 Some significant beneficial effects have been identified including through the generation of construction employment and direct, indirect, induced and catalytic jobs created. For the years assessed, the total number of jobs to be created are as follows:

- **2029 (First Full Year of Dual Runway Airport Opening)** - Direct, indirect, induced and catalytic employment would increase by 990, 860, 1,070 and 2,470 jobs respectively within the UK. The total incremental impact would be 5,400 jobs in the UK.
- **2032 (Interim Assessment Year)** - Direct, indirect, induced and catalytic employment would increase by 3,120, 2,730, 3,390 and 7,600 jobs respectively within the UK. The total incremental impact would be 16,840 jobs in the UK.
- **2038 (Design Year)** - Direct, indirect, induced and catalytic employment would increase by 3,220, 2,810, 3,500 and 7,150 jobs respectively within the UK. The total incremental impact would be 16,670 jobs in the UK.
- **2047 (Long Term Forecast Year)** - Direct, indirect, induced and catalytic employment would increase by 3,100, 2,710, 3,370 and 6,490 jobs respectively within the UK. The total incremental impact would be 15,680 jobs in the UK.

8.3.20 It is anticipated that in 2029, the Project is expected to generate £72.7m of GVA. In 2032, it would generate a further £237.8m of GVA. In 2038, it would generate a further £262.8m of GVA and in 2047, it would generate a further £285.7m of GVA.

8.3.21 There is also a significant beneficial effect identified on the labour market during the operation of the Project from 2032 to 2047 where where major beneficial effects are identified in terms of direct employment. These labour market effects would be subject to further enhancement measures as part of the **ESBS** (**ES Appendix 17.8.1)** (Doc Ref. 5.3).

8.3.22 An outline ESBS was published by GAL as part of its Autumn 2021 consultation. The ESBS has been developed to take on board the comments received during the consultation and through engagement with key stakeholders which have included local businesses and education providers plus borough, district and county council authority representatives. Two external advisers have also helped shape the ESBS. These are Julie Kapsalis who is the Chair of the Coast to Capital LEP and Jeff Alexander who is the Executive Director of Gatwick Diamond Initiative, a business-led partnership focused upon the growth of new and established companies and inward investment.

8.3.23 The ESBS describes how Gatwick would support the creation of the conditions required to successfully deliver the significant opportunities that are expected through the construction and operational phases of the Project for:

- sustainable employment, skills development and career progression for communities; and
- enhancements in the productivity and growth of business.

8.3.24 The ESBS would be secured via the NRP Section 106 agreement. It is underpinned by a series of overarching objectives:

- the generation of insight into contemporary labour and skills needs and demands;
- good relationships with the right partner agencies;
- the availability of high quality, interconnected recruitment, training and business engagement infrastructure;
- effective, clear, practical processes required for residents and businesses to access opportunities in a timely way; and
- a strong recruitment framework within Gatwick, with Diversity, Equity and Inclusion (DE&I) at its heart, to make sure GAL attract people from all sectors of the community and that GAL minimise bias during the selection process.

8.3.25 The ESBS requires an ESBS Implementation Plan to be prepared. This will describe, in detail, how GAL will collaborate with partners to deliver the ESBS. The Implementation Plan would be developed pursuant to the agreement of ESBS mitigations. The ESBS Implementation Plan will be secured via the Section 106 agreement.

8.3.26 For the ESBS to be most effective, GAL will focus ESBS investments and actions in locations and in ways that will deliver greatest impact. It is envisaged that benefits would particularly flow to the areas most likely to be affected during the construction and operational phases. This includes the whole of Crawley and parts of Horsham, Mid Sussex, Mole Valley, Reigate and Banstead and Tandridge and then to wider areas. It is expected that ESBS employment and skills activities would be delivered primarily within the same area (being careful to focus upon areas exhibiting the highest levels of deprivation and where social mobility is low), whilst initiatives to engage and drive up the productivity of business would be delivered across the wider area.

8.3.27 The options for actions identified in the ESBS that could feature in the ESBS Implementation Plan include the following:

- review of the Implementation Plan every 5 years to ensure that key activities still have potential to maximise benefits, and to apply adjustments if needed
- recruitment and skills actions to address construction workforce requirements in collaboration with the National Skills Academy for Construction (NSAfC)
- injection of funds to support Further or Higher Education curriculum development or to release funds to support bids to national or other relevant funding regimes (like the Construction Innovation Centre proposal being spearheaded by the University of Brighton)
- employing employment brokers to work with the GAL team, the GAL Family and contractors to identify vacancies; glean the knowledge, skills and aptitudes required of recruits to meet job requirements; and provide opportunities for residents to access them either directly or through upskilling/wraparound support
- 'Gateway to Jobs' actions would include securing Work Experience and Internships, Apprenticeships (supported by an Apprenticeship Levy) and Graduate Recruitment opportunities plus upskilling opportunities for the existing workforce
- developing a consortium of delivery agencies that will be tasked with delivering ESBS employment and skills outcomes, incorporating a range of interventions that would prepare potential candidates for the opportunities. GAL would envisage that the consortium has, at its heart, the delivery partnership behind the Sussex and Surrey Institute of Technology, which will be located in Crawley. These are Chichester College Group, North East Surrey College of Technology (NESCOT) and the Universities of Sussex and Brighton

- delivery of an integrated education engagement strategy
- subject to a year-long feasibility and piloting phase, the development of an on-site Science, Technology, Engineering and Maths (STEM) Centre
- facilitate access to contracting opportunities for SMEs
- development of a scholarship programme for young people (non-construction)
- develop a Regional Inward Investment Service (in collaboration with the Gatwick Diamond Initiative) to bring together public and private sector partners to drive inward investment and growth
- support the development of a clear Visitor Generation Strategy in collaboration with Gateway Gatwick Partnership members to promote regional tourism

8.3.28 No significant adverse effects have been identified in the socio-economic assessment. Indeed the assessment concludes that the Project will result in major beneficial effects especially in terms of generating construction employment and direct job creation duing the operation of the Project. Moderate beneficial significant effects have also been identified in relation to indirect, induced and catalytic employment plus labour market effects in some areas during the operation of the Project.

Planning Policy Compliance

8.3.29 It is clear that the Project will deliver significant benefits in terms of economic growth (including job creation, GVA contributions and increased tourism) and long-term, wider socio-economic benefits. These benefits will be experienced at a local, regional and national level. The Project therefore accords strongly with the Government's policy to grow the aviation sector to support its economic growth agenda. The Project clearly accords with the ANPS, the NNNPS, the NPPF and regional and local strategies and policies that support growth at Gatwick Airport building on proven ability to perform as an economic growth generator. Expanding the airport will mean that the economic and social benefits and strengths already associated with the airport will increase and this is a significant factor in the consideration of this DCO application.

8.3.30 The employment, skills and training opportunities to arise from the proposal are also significant. The **ESBS** submitted with the application (**ES Appendix 17.8.1)** (Doc Ref. 5.3) clearly demonstrates that GAL is committed to investing significantly in maximising opportunities for local residents at all levels and ages in accordance with paragraph 5.266 of the ANPS.

8.3.31 The Project has also been shown to achieve the economic and social objectives which underpin sustainable development and planning policy objectives that wish to build a strong, competitive economy by improving productivity through the provision of much needed infrastructure. By expanding Gatwick Airport's capacity, conditions will be created whereby businesses can invest, expand and adapt.

8.3.32 Growth at Gatwick and the economic and social benefits associated with that are crucial and define the opportunity for growing the LEP area's economy, including through tourism.

8.3.33 The NPPF states that 'significant weight' should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. Significant weight should therefore be attached to the proposals for development presented in this DCO application. Gatwick will be able to

capitalise on its performance and potential and remain as a gateway for trade, a national asset and the single biggest employment and business hub in the LEP area.

8.4 Surface Access and Impacts on Transport Networks

Policy Context

8.4.1 The highway works proposed fall to be determined against the policies of the NNNPS, although they are promoted to serve the expansion of the airport. Policies of the ANPS are also relevant and the NNNPS makes clear that the strategic road network provides critical links between our cities, communities and airports and that there is a need in principle to improve the linkages with airports (NNNPS paragraphs 2.8 and 2.13).

8.4.2 The ANPS contains policies in respect of the surface access to airports. Paragraph 5.5 of the ANPS states that the Government's objective for surface access is to ensure that access to the airport by road, rail and public transport is high quality, efficient and reliable for passengers, freight operators and airport workers who use transport on a daily basis. The Government also wishes to see the number of journeys made to airports by sustainable modes of transport maximised as much as possible.

8.4.3 Paragraph 5.9 of the ANPS is particular to the proposal for a Northwest Runway at Heathrow but is nonetheless relevant to other proposals for airport expansion. It requires the Applicant to prepare an airport surface access strategy in accordance with the guidance contained in the Aviation Policy Framework. The airport surface access strategy must reflect the needs of the scheme contained in the application for development consent, including any phasing over its development, implementation and operational stages, reflecting the changing number of passengers, freight operators and airport workers attributable to the number of air traffic movements. The strategy should reference the role of surface transport in relation to air quality and carbon. The airport surface access strategy must contain specific targets for maximising the proportion of journeys made to the airport by public transport, cycling or walking. The strategy should also contain actions, policies and defined performance indicators for delivering against targets.

8.4.4 Paragraph 5.10 states that the Applicant should assess the implications of airport expansion on surface access network capacity using the WebTAG methodology stipulated in the Department for Transport guidance[56], or any successor to such methodology. The Applicant should consult Highways England, Network Rail and highway and transport authorities, as appropriate, on the assessment and proposed mitigation measures. The assessment should distinguish between the construction and operational project stages for the development comprised in the application. Paragraph 5.12 states that the Applicant will need to demonstrate that National Highways, Network Rail and any relevant highway and transport authorities and transport providers are content with the deliverability of any new transport schemes or other changes required to existing links to allow expansion within the timescales required.

[56] Transport analysis guidance - GOV.UK (www.gov.uk)

8.4.5 Paragraph 5.13 of the ANPS states that for schemes and related surface access proposals or other works impacting on the strategic road network, the Applicant should have regard to DfT Circular 02/2013, *The Strategic Road Network and the delivery of sustainable development*[57] (or prevailing policy), and the NNNPS.

8.4.6 Paragraph 5.14 of the ANPS recognises that the surface access systems and proposed airport infrastructure may have the potential to result in severance in some locations. Where appropriate, the Applicant should seek to deliver improvements or mitigation measures that reduce community severance and improve accessibility.

8.4.7 Paragraphs 5.15 and 5.16 of the ANPS relate to mitigation and state that the Applicant should set out the mitigation measures that it considers are required to minimise and mitigate the effect of expansion on existing surface access arrangements and demonstrate in its assessment, that the proposed surface access strategy will support the additional transport demands generated by airport expansion and that this can be appropriately secured.

8.4.8 Section 6 of this Planning Statement summarises the relevant policy contained in the NNNPS which 'has effect' in the determination of this DCO application due to the improvements to the North Terminal and South Terminal roundabouts being highways-related development (for the purposes of the Act) in their own right. Paragraphs 5.201 to 5.218 of the NNNPS specifically deal with the impacts of a scheme on wider transport networks and of construction sites on the networks whilst a scheme is being developed. Paragraph 5.206 of the NNNPS states that the Applicant should describe those impacts in their ES along with mitigating commitments and provide a proportionate assessment of the transport impacts on other networks.

8.4.9 Paragraphs 5.203 to 5.205 in the NNNPS state that the Applicant should have regard to the policies set out in local plans and also consult the relevant highway authority, and local planning authority, as appropriate, on the assessment of transport impacts. In addition, the NNNPS states that the Applicant should consider reasonable opportunities to support other transport modes in developing infrastructure.

8.4.10 Paragraph 5.208 of the NNNPS states that where appropriate, the Applicant should prepare a travel plan including management measures to mitigate transport impacts. The Applicant should also provide details of proposed measures to improve access by public transport and sustainable modes where relevant, to reduce the need for any parking associated with the proposal and to mitigate transport impacts.

8.4.11 Paragraphs 5.215 and 5.216 in the NNNPS relate to mitigation measures for schemes which are required to be proportionate and reasonable and focussed on promoting sustainable development. The NNNPS states that there is a very strong expectation that impacts on accessibility for non-motorised users should be mitigated.

8.4.12 Section 9 of the NPPF contains policies that promote sustainable transport and paragraph 104 states that transport issues should be considered from the earliest stages of plan-

[57] Strategic road network and the delivery of sustainable development - GOV.UK (www.gov.uk)

making and development proposals, so that:

- the potential impacts of development on transport networks can be addressed;
- opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;
- opportunities to promote walking, cycling and public transport use are identified and pursued;
- the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and
- patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.

8.4.13 Policy GAT3 in the Crawley Borough Local Plan 2015-2030 (December 2015) relates to Gatwick Airport related parking. It states that the provision of additional or replacement airport parking will only be permitted within the airport boundary. All new proposals must be justified by a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport. Policy IN3 (Development and Requirements for Sustainable Transport) states that developments should meet the access needs they generate and not cause an unacceptable impact in terms of increased traffic congestion or highway safety. It further states that developments will be permitted unless the cumulative impact on the transport network is severe and cannot be satisfactorily mitigated.

Assessment

8.4.14 **ES Chapter 12: Traffic and Transport** (Doc Ref. 5.1) provides an assessment of the potential surface access, traffic and transport effects of the Project during the construction and operation periods. In particular, it:

- sets out the existing and future baseline conditions on the highway network, public transport services and walking and cycling infrastructure. The Project is assessed against the future baselines. For the highway network, the future baselines are established from extensive strategic modelling work which takes into account background growth and cumulative developments;
- presents the potential environmental effects on traffic and transport arising from the Project; and
- highlights any necessary monitoring and/or mitigation measures that could prevent, minimise, reduce or offset the possible environmental effects identified in the EIA process.

8.4.15 Chapter 12 covers the traffic and transport effects on people arising from the Project and provides an assessment on severance, driver delay, pedestrian and cyclist delay and amenity, accidents and safety, hazardous loads, and effects on public transport amenity including at Gatwick Airport Station. A full list of the issues considered in the traffic and transport assessment are detailed in **Table 12.4.1 in ES Chapter 12** (Doc Ref. 5.1).

8.4.16 The traffic modelling outputs of the assessment have been used to inform the assessments

contained in **ES Chapter 13: Air Quality, ES Chapter 14: Noise and Vibration, ES Chapter 15: Climate Change** and **ES Chapter 16: Greenhouse Gases** (all Doc Ref. 5.1).

8.4.17 A **Transport Assessment** (TA) (Doc Ref. 7.4) is submitted separately with the DCO application. The TA provides more information on the assessment of the impacts of the Project on the transport networks, including demand forecast/trip generation information and modelling methodologies. The annexes to the TA provide extensive technical reports on strategic modelling (highways and public transport), microsimulation modelling and Gatwick Airport station and shuttle modelling.

8.4.18 GAL already has an Airport Surface Access Strategy 2022-2030 (the ASAS). It aims to achieve the targets set out in Gatwick Airport's Decade of Change documents in a situation without the Project. In the context of the Project's proposals, GAL has separately developed **Surface Access Commitments (SACs)** (Doc Ref. 5.3) which define the surface access outcomes that GAL commits to achieving at the Airport with the Project in place. In due course, and in accordance with the expected cycle of ASAS, GAL will produce a new ASAS to refresh its strategy which will be informed by these SACs and become the means through which those commitments are delivered. All ASAS and SAC measures identified and relied upon for the traffic and transport assessment are summarised in Section 12.6 (Future Baseline) and Section 12.8 (with Project) in **ES Chapter 12.**

8.4.19 Outside of the public consultations that were held by GAL in Autumn 2021 and Summer 2022, GAL has engaged continually with key stakeholders including National Highways, West Sussex County Council and Surrey County Council as the Local Highway Authorities, Network Rail and Transport for London. Details of this engagement are summarised in **Table 12.3.4** in **ES Chapter 12.**

8.4.20 **Section 12.6** in **ES Chapter 12** sets out some aspects of the existing baseline position at Gatwick which are important to note. These are as follows:

- **Mode Share and Travel Patterns** – CAA surveys to the first quarter of 2020 (prior to the impact of Covid-19) show a continuing improvement in public transport mode share year-on-year, up to 47.4% in 2019 and 47.8% in the 12 months to March 2020. Post-pandemic mode share data is emerging. In 2022 the annualised public transport mode share for Gatwick Airport was 43.7%, indicating that the Airport is still in recovery, with public transport services not yet returning to pre-pandemic levels and the effect of rail strikes and related disruption.

- **Surface Transport Facilities at the Airport** – these are made up of on-airport roads, forecourts and car parks, including facilities for coaches, taxis and car rental companies. GAL has recently completed works to improve the North Terminal Forecourt and has introduced forecourt charging at both terminals. There are currently around 46,700 car parking spaces 'on airport', including staff parking, and a further 21,200 authorised spaces 'off-airport'.

- **Rail** - Gatwick Airport station has regular, direct daily services from over 120 stations. Over 1,000 stations are accessible with one interchange. Gatwick Airport therefore enjoys a very high level of rail connectivity, with around 18 trains to and from central London via London Bridge or London Victoria in the morning peak hour. Rail upgrade works commenced at Gatwick Airport station in 2019 and are due to complete in 2023.

- **Bus and Coach** - Gatwick is served by frequent bus and coach services at both North and South Terminals. The operators include Metrobus, National Express, Megabus and Oxford Bus Company.

- **Walking and Cycling** - Based on mode share information, very few air passengers walk or cycle to the Airport and a low percentage of staff walk or cycle to the Airport. Given the extent of the catchment area for walking and cycling trips, the focus to improve active travel is on staff from nearby residential areas, including Horley and Crawley.

8.4.21 As part of the future baseline position (based on anticipated passenger growth in the absence of the Project), GAL is proposing to upgrade the South and North Terminal Roundabouts through local widening and signalisation in order to provide additional capacity, working with National Highways. These improvements are identified in GAL's Capital Investment Programme (CIP) and are programmed to be completed before 2029.

8.4.22 A number of measures have been designed into the Project to reduce the potential for impacts on traffic and transport. The measures for traffic and transport are listed in Table 12.8.1 in **ES Chapter 12** as follows:

- **Surface Access Improvements (Highways)** - traffic modelling shows that the surface access improvements will be required for the Project by assessment year 2032. The surface access improvement works include changes to the North and South Terminal Roundabouts to provide grade-separagraphted solutions. The Longbridge Roundabout also requires modification. These works are in addition to the CIP works identified and already committed to in the absence of the Project in the future baseline. These improvements are shown in the **Surface Access Highways Plans – General Arrangements** (Doc Ref.4.8.1)

- **Surface Access Improvements (Active Travel**) - improvements to walking and cycling infrastructure are incorporated into the highway proposals to improve accessibility and overcome severance (illustrated in **Figure 12.6.2** in **ES Chapter 12**).

- **Surface Access Commitments (ES Appendix 5.4.1)** (Doc Ref. 5.3) - GAL has set mode share commitments alongside commitments to interventions that would be implemented to support the achievement of these mode shares. The SACs also contain commitments to funding enforcement measures against off-airport parking and confirm GAL's continuing commitment to contribute to a Sustainable Transport Fund, established under the existing Gatwick Section 106 agreement and to a new contingent transport fund which can be drawn upon if required.

- **Travel Plan (Construction)** - a Workforce Travel Plan will be implemented for construction workers, as part of the wider approach to managing the transport aspects of construction activity. An **Outline Construction Workforce Travel Plan** has been prepared and is included in **ES Appendix 5.3.2** (Doc Ref. 5.3)..

- **Temporary Diversion Routes during construction** - temporary diversion routes for traffic and pedestrians would be required during highway construction to maintain safety.

- **Outline Construction Traffic Management Plan (CTMP)** - as part of the construction works, a traffic management strategy would be put in place to minimise any negative environmental and community impacts. This is provided in ES **Appendix 5.3.2** (Doc Ref. 5.3)

- **Surface Access Commitments to Monitoring** - the SACs also commit to monitoring and reporting progress towards achieving the mode share commitments. Annual reporting will be undertaken and reported to the Transport Forum Steering Group.

- **Travel Plan Monitoring (Construction)** - monitoring of the Workforce Travel Plan will indicate how well it is performing at meeting the target mode shares and any other targets that are set for the construction period.

8.4.23 In view of the mode share commitments, on-airport air passenger car parking is limited to a net gain of 1,100 notwithstanding the scale of growth forecast in passenger numbers. The proposals include some 8,900 new parking spaces which would replace the same number that would be lost as part of the construction of the Project. No increase is proposed in staff parking numbers.

8.4.24 Within the SACs, GAL commits to achieving the following annualised mode shares within three years of the opening of the new northern runway:

- A minimum of 55% of air passenger journeys to and from the Airport to be made by public transport (rail, local bus, regional/express bus or coach or another commercially-operated shared transport service for public use);
- A minimum of 55% of staff journeys to and from the Airport to be made by public transport, shared travel (a journey made by private car containing more than one person) and active modes (walking and cycling);
- A reduction of air passenger drop-off and pick-up car journeys at the Airport to a mode share of no more than 12% of surface access journeys; and
- At least 15% of staff journeys to work originating within 8km of the Airport to be made by active modes.

8.4.25 The assessment shows that the interventions tested can adequately mitigate the surface access effects of the Project and achieve at least the committed mode shares within three years of the commencment of dual runway operations. These mode shares represent the minimum commitment GAL is making, and (in-keeping with its past high performance in this area), GAL aspires to a high sustainable, low emission mode share and will continue to work towards achieving in excess of the committed mode shares, in conjunction with stakeholders.

8.4.26 The identified measures and interventions are forecast to lead to an increase in annual average air passenger public transport mode share from around 45% prior to the Covid-19 pandemic, up to 52% for all future baseline years, and 54% to 56% between 2029 and 2047 in the 'with Project' scenario. This increase in public transport mode share for air passengers is significant and notable given the high public transport mode share already achieved at the Airport. In terms of employees, the strategic model shows that a sustainable transport mode share of 48% to 50% is expected in the future baseline, increasing to between 55% and 56%

in the 'with Project' scenario.

8.4.27 The **SACs** (Doc Ref. 5.3) set out GAL's commitment to monitoring and reporting. Comprehensive monitoring will be undertaken based on a range of data sources (including surveys, barrier counts at car parks, automatic number plate recognition data, traffic flows, gateline data), and GAL will prepare Annual Monitoring Reports (AMRs). The first AMR will be produced six months before the commencement of dual runway operations.

8.4.28 A detailed assessment has been made of the impact of the Project on the transport networks around the Airport and in the wider area. The assessment has shown that the growth in passenger and employee numbers as the result of the Project can be accommodated on the public transport networks, with limited changes to crowding on rail services, increases in patronage on bus and coach services and sufficient capacity at Gatwick Airport station.

8.4.29 Within the vicinity of the Airport, there are existing segregated pedestrian and cycle routes. The proposed surface access improvements will improve walking and cycling infrastructure and connections, including crossings to reduce severance and dedicated walking and cycling paths to reduce conflicts and the risk of accidents. The focus for improving active travel is on staff journeys from nearby residential areas, including Horley and Crawley, although the benefits of the improvements will be to all users on these routes, not only airport staff.

8.4.30 The highway improvement works would provide adequate capacity to cater for background growth and airport-related growth with the Project, providing an overall improvement to local highway network performance when compared to the future baseline. They will also deliver key pedestrian and cyclist connections and infrastructure.

Planning Policy Compliance

8.4.31 Gatwick is a key transport hub, where a range of transport modes connect, including 24-hour rail, bus and express coach services. The Airport has a fully integrated railway station on the Brighton Main Line and is also served by trains on the North Downs Line and Arun Valley Line. An inter-terminal shuttle system operates between the North and South Terminals. This connectivity means that the airport achieved a high public transport mode share of around 47% prior to the pandemic. In pursuing an increase in public transport mode share, Gatwick has consistently out-performed other major UK airports over the last 10-15 years, seeing considerable growth in the percentage of trips using sustainable modes.

8.4.32 The assessment of the likely traffic and transport effects of the Project demonstrates that, in accordance with the Government's objective for surface access (as stated in paragraph 5.5 of the ANPS), the Project will ensure that access to the airport by road, rail and public transport will be high quality, efficient and reliable for passengers, freight operators and airport workers. The Project is not expected to give rise to any significant transport or traffic effects subject to implementing the measures proposed. When compared to the future baseline scenario, the highway works proposed in the vicinity of the airport generate improved accessibility, not just to the Airport but also for other users of the local and strategic road network.

8.4.33 GAL has assessed the implications of its proposed Airport expansion on the surface access network in full consultation with key stakeholders including National Highways, Network Rail and highway and transport authorities who have considered the proposed mitigation

measures (in accordance with 5.10 of the ANPS). These stakeholders are broadly content with the deliverability of the new transport schemes and improvements to existing links. Engagement with these stakeholders is ongoing and is being managed through the Statement of Common Ground process in parallel with ongoing technical discussions.

8.4.34 GAL has committed to surface access commitments that will see the number of journeys made to the Airport by sustainable modes of transport optimised above an already high base, directly in accordance with Government policy objectives (ANPS paragraph 5.5). GAL is committed to low-carbon growth and its Decade of Change strategy sets ambitious carbon reduction targets. The current ASAS sets out objectives and actions to encourage sustainable travel, including to continue to innovate as the best connected and most accessible UK airport, delivering integrated surface transport and sustainable growth by meeting the needs of customers and airport colleagues. The SACs provide further ambitious mode share commitments beyond those in the current ASAS and additional interventions to respond to the increase in total passenger throughput that is expected with the Project.

8.4.35 The SACs will inform a future version of the Gatwick ASAS in due course, which will set out the overall strategy for implementation. This accords with the requirements of paragraph 5.9 of the ANPS.

8.4.36 In accordance with paragraph 5.14 of the ANPS and paragraphs 5.215 and 5.216 of the NNNPS, the Project will deliver improvements and mitigation measures that will reduce community severance, improve accessibility for active modes and promote sustainable travel. For example, the proposed pedestrian crossing at the new signalised junction on A23 London Road and the new pedestrian and cyclist path between Longbridge Roundabout and North Terminal Roundabout will provide enhanced connectivity for pedestrians and cyclists to the Airport. These improvements are being achieved at the same time as enhancements to the overall capacity of the local network.

8.4.37 The traffic modelling work shows that without the Project, the network would operate close to capacity in several locations. With the additional Project demand together with the proposed highway works, the modelling work shows improved performance on the network compared to the equivalent future baseline scenario. This includes locations such as the M23 Spur, where congestion would largely be removed, South and North Terminals where queues would be substantially reduced, and Longbridge Roundabout where conditions would be improved compared to those expected in the future baseline. This would be achieved in addition to the extra capacity provided for active modes within the highway works. Although some parts of the network would remain busy, with the proposed highway improvements, the overall operation of the highway network would remain acceptable. The modelling and assessment of the Project is undertaken in accordance with paragraph 5.10 of the ANPS.

8.4.38 The proposed mitigation measures as described above will ensure that the additional transport demands generated by airport expansion will be acceptable. They will be appropriately secured through Requirements or via the Section 106 agreement to be secured as part of the DCO in accordance with paragraphs 5.15 and 5.16 of the ANPS. The proposals include a contingent fund to address unexpected impacts and continued financial support for sustainable modes through continued investment in the Sustainable Transport Fund to enable enhanced bus and coach services.

8.4.39 In terms of parking provision, the number of spaces being proposed has reduced since the statutory consultation in Autumn 2021 in response to comments received. In particular, the application does not include a specific allowance to relocate unauthorised off-airport parking within the airport boundary. Instead, the number of additional parking spaces proposed is limited to reflect the modelled effects of the enhanced non-car mode share commitments and GAL has committed funds to be used by the local authorities to enforce against unauthorised off-airport parking and fly-parking in local residential areas.

8.4.40 Taking into account the proposed mitigation, there are no significant adverse impacts expected on the wider transport networks from the construction or operation of the Project. .

8.4.41 The Project will generate increased traffic and transport demands with the growth of the Airport. Overall, however, the Project limits those impacts to acceptable levels, whilst providing enhancements to the local highway network and to active travel and public transport networks. The Project accords with the relevant planning policies in both the NNNPS and the ANPS and with relevant local policy and the benefits that it secures should be afforded weight in the planning balance.

8.5 Air Quality

Policy Context

8.5.1 Paragraph 5.23 of the ANPS recognises that increases in emissions of pollutants during the construction or operational phases of the scheme could result in the worsening of local air quality and that increased emissions can contribute to adverse impacts on human health and on the natural environment.

8.5.2 Paragraph 5.35 of the ANPS states that the SoS will need to be satisfied that the mitigation measures put forward by the Applicant are acceptable, including at the construction stage. Paragraph 5.36 acknowledges that mitigation measures may affect the project design, layout, construction and operation, and/or may comprise measures to improve air quality in pollution hotspots beyond the immediate locality of the scheme. Paragraph 5.40 states that mitigation measures at the construction stage should also be provided and draw on best practice from other major construction schemes. Specific measures could include but are not limited to development of a construction traffic management plan; use of low emission construction plant/ fleet, fitting of diesel particulate filters, and use of cleaner engines; active workforce management/ a worker transport scheme etc.

8.5.3 Paragraph 5.42 of the ANPS states that the SoS will consider air quality impacts over the wider area likely to be affected, as well as in the vicinity of the scheme. In order to grant development consent, the SoS will need to be satisfied that, with mitigation, the scheme would be compliant with legal obligations that provide for the protection of human health and the environment. Paragraph 5.43 on the ANPS explains that air quality considerations are likely to be particularly relevant where the proposed scheme:

- is within or adjacent to Air Quality Management Areas, roads identified as being above limit values, or nature conservation sites (including Natura 2000 sites and Sites of Special Scientific Interest).
- would have effects sufficient to bring about the need for new Air Quality Management Areas or change the size of an existing Air Quality Management Area, or bring about

changes to exceedances of the limit values, or have the potential to have an impact on nature conservation sites; and

- after taking into account mitigation, would lead to a significant air quality impact in relation to Environmental Impact Assessment and / or to a deterioration in air quality in a zone or agglomeration.

8.5.4 Paragraph 5.232 in the ANPS recognises that for nationally significant infrastructure projects of the type covered by the ANPS some impact on amenity for local communities is likely to be unavoidable. However, impacts should be kept to a minimum and should be at a level that is acceptable. Paragraph 5.233 of the ANPS states that the applicant should assess any likely significant effects on amenity from emissions of dust, and odour and other emissions in the ES. Paragraph 5.236 states that the SoS should ensure the Applicant has provided sufficient information to show that any necessary mitigation will be put into place. Paragraph 5.237 in the ANPS states that the SoS should be satisfied that all reasonable steps have been taken, and will be taken, to minimise any detrimental impact on amenity from emissions of dust and odour.

8.5.5 The requirements in the NNNPS insofar as it relates to the assessment of air quality (paragraphs 5.3 to 5.15) and dust and odour (paragraphs 5.81 to 5.88) are largely as set out in the ANPS. Paragraph 5.5 of the NNNPS does recognise that development on the national networks in general and road schemes in particular, creates complex challenges with regards to air quality, given the very wide geographical area over which impacts (positive and negative) can potentially be felt. Paragraph 5.12 of the NNNPS states that the SoS must give air quality considerations substantial weight where, after taking into account mitigation, a project would lead to a significant air quality impact in relation to EIA and/or where they lead to a deterioration in air quality in a zone/agglomeration under the Air Quality Directive58. Paragraph 5.15 of the NNNPS states that mitigation measures could include, but are not limited to, changes to the route of the new scheme, changes to the proximity of vehicles to local receptors in the existing route, physical means including barriers to trap or better disperse emissions and speed control. It is recognised that implementation of mitigation measures may require working with partners to support their delivery.

8.5.6 Paragraph 174 of the NPPF refers to how the planning system should contribute to and enhance the natural and local environment by, amongst other things, preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of air pollution. Paragraph 186 states that planning decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants taking into account Air Quality Management Areas and Clean Air Zones and opportunities to improve air quality or mitigate impacts should be identified including through traffic and travel management. Paragraph 188 of the NPPF helpfully states that the focus of planning decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions

[58] DIRECTIVE 2008/50/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 21 May 2008 on ambient air quality and cleaner air for Europe - [redacted]

(where these are subject to separate pollution control regimes).

Assessment

8.5.7 **ES Chapter 13: Air Quality** (Doc Ref. 5.3) provides an assessment of the NRP on air quality and odour.

8.5.8 Table 13.13.1 in **ES Chapter 13** summarises the potential impacts based on the construction period (including demolition) and the operational period.

8.5.9 A wider study area incorporating the 11 km by 10 km domain centred on the airport in addition to the modelled Affected Road Network outside this area (roads that exceed the guidance screen criteria) has been assessed (**Figure 13.1.11** in **ES Chapter 13**). The 11 km by 10 km domain has been selected to account for all emissions cumulatively within the vicinity of the airport. The area was selected to take into account the effect of aircraft emissions which have been assessed for the landing and take-off (LTO) cycle up to 3,000 ft (approximately 915 metres) in height as defined by the International Civil Aviation Organization (ICAO). Previous modelling assessments at other major UK airports have shown that air quality impacts from aircraft and on-airport sources are captured by a study area of this scale.

8.5.10 **Table 13.5.1** in **ES Chapter 13** summarises the issues considered in the assessment during the construction period and the operational period. These are as follows:

Activity	Potential Effects
Construction Period (including Demolition): Air Quality	
Construction and demolition activities, including upgraded highway junctions, earthworks, land preparation, construction sites and airside development	Dust generation causing annoyance due to dust soiling, human health impacts due to increased PM_{10} concentrations and harm to ecological receptors.
	Emissions from construction vehicles and non-road mobile machinery causing human health impacts due to increased NO_2, PM_{10} and $PM_{2.5}$ concentrations.
Construction vehicle movements using the public highway network	Emissions from construction road traffic causing human health impacts due to increased NO_2, PM_{10} and $PM_{2.5}$ concentrations, and harm to ecological receptors due to increased NO_x concentrations.
Operational Period: Air Quality	
Use of airport including aircraft, road traffic (and including upgraded highway junctions) and on-site plant	Emissions from road traffic causing human health impacts due to increased NO_2, PM_{10} and $PM_{2.5}$ concentrations, and harm to ecological receptors due to increased concentrations, nitrogen and acid deposition.
	Aircraft emissions causing human health impacts due to increased NO_2, PM_{10} and $PM_{2.5}$ concentrations, and harm to

Activity	Potential Effects
	ecological receptors due to increased NO_x concentrations and nitrogen and acid deposition.
	Emissions from airport operations/combustion plant causing human health impacts due to increased NO_2, NO_x PM_{10} and $PM_{2.5}$ concentrations, and harm to ecological receptors due to increased NO_x, NH_3 concentrations and nitrogen and acid deposition.
	Emissions from the CARE facility (a biomass boiler process at Gatwick Food Waste to Energy Plant) causing human health impacts due to increased NO_x, NO_2, PM_{10}, $PM_{2.5}$, VOC, SO_2 and CO and harm to ecological receptors due to increased NO_x concentrations, nitrogen and acid deposition. Plume visibility assessment from CARE facility.
	Increased emissions of odours from operations (eg aircraft fuel, other airport operations/plant) causing annoyance.

8.5.11 The sensitive **Air Quality Receptors** that have been identified and considered as part of the assessment are detailed in **ES Appendix 13.6.2** (Doc Ref. 5.3). In total, 1,783 representative sensitive human receptors have been selected including 284 schools/nurseries, 381 hospitals/care homes, 903 residential dwellings, 134 committed developments and 81 receptors requested by Reigate and Bansted Borough Council (RBBC). On-airport receptors (hotels, offices and passengers) have also been considered. Sensitive ecological receptors are defined as those sites whose features have been designated as sensitive to air pollutants, either directly or indirectly. This includes statutory designations such as Sites of Special Scientific Interest (SSSI), Special Protection Areas (SPAs), Special Areas of Conservation (SACs), National Nature Reserves (NNR), Local Nature Reserves (LNRs) as well as non-statutory designations such as ancient woodlands. The air quality assessment included both statutory and non-statutory sites in the wider study area.

8.5.12 A number of measures have been designed into the Project to reduce the potential for impacts on air quality. These are summarised in **Table 13.9.1** in **ES Chapter 13.** Mitigation is required for the construction period in relation to best practice measures for the control of dust and construction related emissions. The operational phase includes mitigation measures set out within the **Carbon Action Plan** in **ES Appendix 5.4.2** (Doc Ref. 5.3) and **Surface Access Commitments** in **ES Appendix 5.4.1** (Doc Ref. 5.3) which will help to reduce emissions associated with the project. It should be noted that, whilst there are technical considerations applied in the Greenhouse Gases assessment within the **ES** for the alignment with Government policy on net zero within the aviation sector, the air quality assessment does not include these assumptions – in order to comply with best practice approaches to deliver a conservative assessment of future impacts. Although the toolkit measures of the **Carbon Action Plan** relate to Greenhouse Gas emissions, the measures would also benefit air quality and it would be expected that total emissions will be lower in

the future in relation to energy usage and airside vehicles **ESES**.

Construction Dust

8.5.13 Following the implementation of the dust control measures set out in **Appendix 13.8.1** in **ES Chapter 13** and in the **Code of Construction Practice** in **ES Appendix 5.3.2** (Doc Ref. 5.3) the effects of construction-related activities on dust soiling and human health would not be significant.

Construction Traffic Assessment (Airfield and Highways Construction Periods)

8.5.14 No significant effects for air quality are anticipated for the either construction period scenario, the 2024-2029 construction period due to airfield works or for the 2029-2032 construction period due to highway works. The assessments of the construction period traffic emissions are based 2024 and 2029, the peak years for airfield and highways construction respectively. **ES**

8.5.15 Since no significant effects have been predicted for air quality during construction, no further additional monitoring beyond that set out in **Table 13.9.1** in **ES Chapter 13** is required. A commitment is made to the continuation of current monitoring and new monitoring locations on the airport site and external to the airport are proposed to allow future monitoring of concentrations as set out in **Table 13.9.1** in **ES Chapter 13.**

Operational

8.5.16 For the assessment of operational emissions, emissions were estimated for the future years 2029, 2032, 2038 and 2047 for all sources across the study area, with and without the NRP. Concentrations were modelled at sensitive receptor locations for the assessment years 2029, 2032 and 2038 across the study area, with and without the Project. In addition, the assessment for these years considers the likely effects of the Slow Fleet Transition Case with the NRP.

8.5.17 By 2047, it is anticipated that there would be improvements in air quality as a result of national efforts to reduce emissions, reduced background concentrations due to national policy and reduced vehicle emissions due to improvements in vehicle technology and uptake of electric vehicles. Therefore, despite the uncertainty of predicting emissions for a future year of 2047, in the absence of detailed dispersion modelling, it has been concluded that the 2047 future year is not at risk of resulting in a significant impact to air quality. The previous year assessment scenarios (2032 and 2038) represent more conservative years in terms of air quality impacts and conclude no significant impacts.

8.5.18 No significant effects for air quality are anticipated for the 2029, 2032, 2038 or 2047 assessment years including on human receptors, ecological receptors or compliance with air quality standards as a result of the Project. No further mitigation or monitoring beyond that already included in the Project is proposed. The mitigation measures outlined in **Table 13.9.1** in **ES Chapter 13**, the **Carbon Action Plan** (Doc Ref. 5.3) and **Surface Access Commitments** (Doc Ref. 5.3) will collectively facilitate emission reductions and improvements in air quality. Monitoring commitments are intended to be secured under the Section 106 Agreement.

8.5.19 Air quality modelling has been carried out to enable a determination of whether the Project would cause likely significant effects on the integrity of European sites. For the purposes of

the air quality assessment undertaken for the **Habitats Regulation Assessment Report (ES Appendix 9.9.1)** (Doc Ref. 5.3), scenario years 2032 and 2038 have been assessed, with 2032 and 2038 traffic information used, respectively. The assessment of effects has been considered in **ES Chapter 9: Ecology and Nature Conservation** (Doc Ref. 5.3).

8.5.20 The CARE facility has been assessed for the first year of operation only (2029) as the impact is assessed as being constant within each year. The total cumulative emissions have been taken into account in the total concentrations in all future years. The CARE facility results in no significant impacts as a result of the Project. In addition, a plume visibility assessment was carried out and it is predicted that there would be no visible plumes greater than 20m in length.

Odour

8.5.21 A qualitative assessment of the effects and potential changes to odour as a result of the operational period of the Project has been carried out. The assessment considers the risk of odour from airport operations (water treatment works, CARE, aircraft emissions and additional use of fuel farms). No assessment has been carried out of odour emissions from the ground during construction related excavations. Where any potential sources of odour are identified during the works, suitable mitigation would be implemented via the **Code of Construction Practice (ES Appendix 5.3.2)** (Doc Ref. 5.3).

8.5.22 Consideration has been paid to the proposed water treatment works and CARE facility and the likely odour effects. The proposed water works are not considered to be significant in relation to odour as it would not handle highly odorous or offensive contaminants. The CARE facility design is at the outline stage, however odour risk would be managed following best practice waste handling procedures. Following best practice methodology to contain and reduce odour effects from the facility would mean that no significant impacts would occur. A detailed odour assessment can be provided at the detailed design stage to demonstrate management of odour effects. No odour impacts would expect to occur from the plume as volatile organic compounds would be burnt off in the incineration process.

8.5.23 The assessment of odour under operational scenarios has been undertaken using a Source Pathway Receptor assessment and review of complaint data. This assessed the distance and direction in relation to prevailing wind and receptor sensitivity. It is possible that local communities (namely Horley Gardens Estate) may experience occasional, short-term odour under specific weather conditions as a result of the increase in airport activity. However, the assessment concludes that the odour effect is considered to be not significant. Best practice measures that will be employed to mitigate odours from the airport are detailed in the **Table 13.9.1** in **ES Chapter 13**.

Planning Policy Compliance

8.5.24 The air quality assessment undertaken for construction and operation periods of the Project concludes that no significant air quality effects are predicted. A number of mitigation measures designed into the Project to reduce the potential for impacts on air quality are summarised in **Table 13.9.1** in **ES Chapter 13** and **ES Appendix 13.8.1 Air Quality Construction Period Mitigation (**Doc Ref. 5.3). In addition, the **Carbon Action Plan** and **Surface Access Commitments** will collectively facilitate reductions and improvements in air quality.

8.5.25 The Project recognises the non-thresholds effects at a population level for pollutants such as NO_2, PM_{10} and $PM_{2.5}$ (Public Health England, 2019), so there are health benefits to be gained from improving air quality even at concentrations below the standards.

8.5.26 The Project is therefore considered to be in accordance with the relevant air quality planning policies and the legal obligations that provide for the protection of human health and environment provisions. Limited air quality effects are not assessed to be significant and, with the mitigation measures proposed, including at construction stage, they should attract only limited negative weight in the planning balance.

8.6 Noise and Vibration

Policy Context

8.6.1 Paragraph 5.44 of the ANPS recognises that the impact of noise from airport expansion is a key concern for communities affected, and that the Government takes this issue very seriously. The ANPS states that high exposure to noise is an annoyance, can disturb sleep, and can also affect people's health and that aircraft operations are by far the largest source of noise emissions from an airport, although noise will also be generated from ground operations and surface transport, and during the construction phase of a scheme. Paragraph 5.45 of the ANPS further recognises that aircraft noise is not only determined by the number of aircraft overhead, but also by engine technologies and airframe design, the paths the aircraft take when approaching and departing from the airport, and the way in which the aircraft are flown.

8.6.2 Paragraph 5.46 of the ANPS importantly notes that, over recent decades, there have been reductions in aviation noise due to technological and operational improvements, and this trend is expected to continue. New technology is already making aircraft quieter. In addition, further opportunities for noise reductions are expected in the next decade as part of the UK airspace modernisation programme[59]. One of the key benefits of this programme is expected to be "*reduced noise from aircraft overflying communities, with less 'holding' at lower altitudes*".

8.6.3 Paragraph 5.47 of the ANPS states that the Government wants to strike a fair balance between the negative impacts of noise (on health, amenity, quality of life and productivity) and the positive impacts of flights. The ANPS recognises that there is no European or national legislation which sets legally binding limits on aviation noise emissions. Major airports are, however, under a legal obligation to develop strategic noise maps and produce Noise Action Plans based on those maps, on a five yearly basis. GAL's current Noise Action Plan[60] covers the period 2019-2024 and was formally adopted by the Parliamentary under SoS for the Environment on 11 February 2019. The ANPS states that airports are also required to review and, if necessary, revise action plans when a major development occurs affecting the existing noise situation. In addition, the Government already expects the noise-

[59] UK airspace policy: a framework for balanced decisions on the design and use of airspace (web version) (publishing.service.gov.uk)

[60] [redacted]

designated airports (Heathrow, Gatwick and Stansted) to produce noise exposure maps on an annual basis. Since 2015, all noise exposure contour reports for the airport have been commissioned by Gatwick Airport Limited. The latest report that is available is for 2021[61].

8.6.4 Paragraph 5.52 of the ANPS requires the Applicant to undertake a noise assessment for any period of change in air traffic movements prior to opening, for the time of opening, and at the time the airport is forecast to reach full capacity, and (if applicable, being different to either of the other assessment periods) at a point when the airport's noise impact is forecast to be highest. This assessment should form part of the ES. The assessment should take into account construction and operational noise (including from surface access arrangements) and aircraft noise. The Applicant's assessment of aircraft noise should be undertaken in accordance with the developing indicative airspace design. This may involve the use of appropriate design parameters and scenarios based on indicative flightpaths.[62] Paragraph 5.53 of the ANPS states that operational noise, with respect to human receptors, should also be assessed using the principles of the relevant British Standards and other guidance. Paragraph 5.64 requires noise mitigation measures at the construction stage to be provided.

8.6.5 Paragraphs 5.54 to 5.66 of the ANPS relate to mitigating noise. Paragraph 5.54 of the ANPS states that noise management at airports where a noise problem has been identified is subject to the concept of a 'Balanced Approach', referred to in EU Regulation 598/2014. Regulation EU 598/2014 requires a range of noise mitigation measures to be considered in accordance with the 'balanced approach', with a view to determining the most effective measure or combination of measures. The balanced approach requires consideration of four main elements:

- noise at source;
- land use planning and management;
- noise abatement operating procedures; and
- noise abatement operating restrictions.

8.6.6 Regulation EU 598/2014 seeks to ensure that 'noise related operating restrictions' are only imposed when other measures within the balanced approach have first been considered, and where those other measures are not in themselves sufficient to attain the specific noise abatement objectives for the airport.

8.6.7 Paragraph 5.55 of the ANPS states that the Government recognises that aircraft noise is a significant concern to communities affected and that, as a result of additional runway capacity, noise- related action will need to be taken. Such action should strike a fair balance between the negative impacts of noise and positive impacts of flights.

8.6.8 Paragraphs 5.57 and 5.58 state that the package and detail of noise mitigation measures should be subject to consultation with local communities and other stakeholders to ensure the most appropriate and effective measures are taken forward, and that noise mitigation measures should ensure the impact of aircraft noise is limited. Paragraph 5.60 of the ANPS

[61] [redacted]

[62] This text is understood to be specific to a third runway at Heathrow where airspace could not be known with certainty. No airspace change is required at Gatwick for the NRP.

states that the Applicant should put forward plans for a noise envelope. Such an envelope should be tailored to local priorities and include clear noise performance targets. As such, the design of the envelope should be defined in consultation with local communities and relevant stakeholders, and take account of any independent guidance such as from the Independent Commission on Civil Aviation Noise. The benefits of future technological improvements should be shared between the Applicant and its local communities, hence helping to achieve a balance between growth and noise reduction. Suitable review periods should be set in consultation with the parties to ensure the noise envelope's framework remains relevant.

8.6.9 Paragraph 3.29 of the Aviation Policy Framework (APF) sets out the overall objective for noise which is to limit and where possible reduce the number of people in the UK significantly affected by aircraft noise. It recognises noise envelopes as a means of giving certainty to local communities about the levels of noise which can be expected in the future and to give developers certainty on how they can use their airports. It further states that within the limits set by the envelope, the benefits of future technological improvements should be shared between the airport and its local communities to achieve a balance between growth and noise reduction. This means that a balance needs to be struck between the economic benefits of permitting growth and the noise impacts of doing so, with the industry able to share the benefits of quieter aircraft in return for the ability to grow.

8.6.10 Paragraph 5.68 of the ANPS states that development consent should not be granted unless the SoS is satisfied that the proposals will meet the following aims for the effective management and control of noise, within the context of Government policy on sustainable development:

- Avoid significant adverse impacts on health and quality of life from noise;
- Mitigate and minimise adverse impacts on health and quality of life from noise; and
- Where possible, contribute to improvements to health and quality of life.

8.6.11 Paragraph 5.186 of the NNNPS states that the Government's policy on noise is set out in the Noise Policy Statement for England which promotes good health and good quality of life through effective noise management. It recognises that similar considerations apply to vibration, which can also cause damage to buildings. It makes clear that for the purposes of the NNNPS, references to noise equally apply to assessments of impacts of vibration. It further states that noise effects of the proposed development on ecological receptors should be assessed (paragraph 5.187).

8.6.12 Paragraph 5.188 sets out the factors that will determine the likely noise impact which will include:

- construction noise and the inherent operational noise from the proposed development and its characteristics;
- the proximity of the proposed development to noise sensitive premises (including residential properties, schools and hospitals) and noise sensitive areas (including certain parks and open spaces);
- the proximity of the proposed development to quiet places and other areas that are particularly valued for their tranquillity, acoustic environment or landscape quality such as National Parks, the Broads or Areas of Outstanding Natural Beauty; and

- the proximity of the proposed development to designated sites where noise may have an adverse impact on the special features of interest, protected species or other wildlife.

8.6.13 Paragraphs 5.189 to 5.192 of the NNNPS set out what is required by way of noise assessment. Paragraph 5.193 states that due regard must have been given to the relevant sections of the Noise Policy Statement for England, National Planning Policy Framework and the Government's associated planning guidance on noise. Paragraph 5.194 states that the project should demonstrate good design through optimisation of scheme layout to minimise noise emissions and, where possible, the use of landscaping, bunds or noise barriers to reduce noise transmission.

8.6.14 Paragraph 5.195 of the NNNPS states that the SoS should not grant development consent unless satisfied that the proposals will meet, the following aims, within the context of Government policy on sustainable development:

- avoid significant adverse impacts on health and quality of life from noise as a result of the new development;
- mitigate and minimise other adverse impacts on health and quality of life from noise from the new development; and
- contribute to improvements to health and quality of life through the effective management and control of noise, where possible.

8.6.15 Paragraphs 5.197 and 5.198 of the NNNPS state that the Examining Authority and the SoS should consider whether mitigation measures are needed both for operational and construction noise over and above any which may form part of the project application and that the SoS may wish to impose requirements to ensure delivery of all mitigation measures which should be proportionate and reasonable.

8.6.16 Paragraph 5.199 of the NNNPS recognises that for most national network projects, the relevant Noise Insulation Regulations will apply. These place a duty on and provide powers to the relevant authority to offer noise mitigation through improved sound insulation to dwellings, with associated ventilation to deal with both construction and operational noise. In extreme cases, the Applicant may consider it appropriate to provide noise mitigation through the compulsory acquisition of affected properties in order to gain consent for what might otherwise be unacceptable development.

8.6.17 The NPPF states that planning decisions should contribute to and enhance the natural and local environment by (amongst other things) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability (paragraph 174). Paragraph 185 states that planning decisions should ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should mitigate and reduce to a minimum, potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life.

8.6.18 In March 2023, the DfT issued a policy paper 'Overarching Aviation Noise Policy'[63] in the lead-up to publishing a noise policy paper later in 2023 and further to a statement made in its strategic framework for the aviation sector 'Flightpath to the Future'. The policy paper was published to frame the night-time noise abatement objective consultation and to provide clarity for airports and their stakeholders preparing or responding to noise action plan consultations. The Government's revised Overarching aviation noise policy statement provides as follows:

> *"The Government's overall policy on aviation noise is to balance the economic and consumer benefits of aviation against their social and health implications in line with the International Civil Aviation Organisation's Balanced Approach to Aircraft Noise Management. This should take into account the local and national context of both passenger and freight operations and recognise the additional health impacts of night flights."*
>
> *"The impact of aviation noise must be mitigated as much as is practicable and realistic to do so, limiting, and where possible reducing, the total adverse impacts on health and quality of life from aviation noise."*

8.6.19 The policy paper explains that, in Aviation 2050 the Government consulted on setting a new objective "*to limit, and where possible, reduce total adverse effects on health and quality of life from aviation noise*." This was to bring national aviation noise policy in line with airspace policy updated in 2017. Consultation responses had provided general support for focus on the total adverse effects, although some respondents highlighted the potential ambiguity of "limit, and where possible, reduce", with some suggestions that policy should be to reduce aviation noise. In response, the policy paper states the Government's position, as follows:

> *"We consider that "limit, and where possible reduce" remains appropriate wording. An overall reduction in total adverse effects is desirable, but in the context of sustainable growth an increase in total adverse effects may be offset by an increase in economic and consumer benefits. In circumstances where there is an increase in total adverse effects, "limit" would mean to mitigate and minimise adverse effects, in line with the Noise Policy Statement for England."*

Assessment

8.6.20 **ES Chapter 14: Noise and Vibration** (Doc Ref. 5.1) provides an assessment of the Project on noise and vibration effects and in particular:

- air noise – noise from aircraft in the air or departing or arriving (including reverse thrust) on a runway, generally assessed to a height up to 7,000 feet above ground level;
- ground noise – noise generated from airport activities at ground level including aircraft taxiing and traffic within the airport boundary;
- road traffic noise – noise from road traffic vehicles outside the airport on the public highway; and

[63] https://www.gov.uk/government/publications/aviation-noise-policy-statement/overarching-aviation-noise-policy

- construction noise and vibration – noise and vibration from temporary construction of the Project, including the use of construction compounds.

8.6.21 The air noise assessment assumes the routing of aircraft to and from the main runway and from the northern runway would remain as it is today. This is because the Project can operate using these routes without need for airspace change. When the likely outcome of the FASI-South airspace change is known then the noise impacts of that change will be assessed as part of that process, following the relevant guidance. Further details of FASI-South and the approach are set out in **ES Chapter 6: Approach to Environmental Assessment** (Doc Ref. 5.1). The air noise assessment is based on the air traffic forecasts summarised in the **Forecast Data Book** (**ES Appendix 4.3.1**) (Doc Ref. 5.3).

8.6.22 Use of the northern runway as part of dual runway operation is proposed to be restricted at night. This is proposed through Requirement no. 19 (3) in Schedule 2 of the DCO. The noise modelling has therefore been undertaken on the basis that the use of the northern runway as part of dual runway operations would be limited to the period 06:00-23:00 hours, avoiding scheduling flights in the majority of the more sensitive night-time period.

8.6.23 The 'central case' used in the noise assessment is based on what was considered before the Covid-19 pandemic to be the most likely rate of fleet transition. However, there is uncertainty around this, particularly at the current time due to effect of the global pandemic and the financial impact on the airlines. Therefore, noise modelling has also been carried out for a 'slower transition fleet' case, based on ATM forecasts in which the rate of fleet transition is delayed by about five years and which would result in higher noise levels than the central case.

8.6.24 The noise and vibration assessment considers the likely significant effects arising from the construction and operation of the Project on:

- people, primarily where they live ('residential receptors') on an individual dwelling basis and on a community basis, including any shared community open areas;
- community facilities such as schools, hospitals, places of worship; and
- commercial properties such as offices and hotels, collectively described as 'non-residential receptors'.

8.6.25 To identify noise impacts, the assessment uses standard methodology which relates noise impact to the level of noise a receptor experiences:

- **LOAEL - Lowest Observed Adverse Effect Level** – this is the level above which adverse effects on health and quality of life can be detected.

- **SOAEL - Significant Observed Adverse Effect Level** – this is the level above which significant adverse effects on health and quality of life occur.

8.6.26 The noise assessment has been carried out based on ATMs forecasts across the assessment years as set out in Table 14.7.1 in **ES Chapter 14** (Doc Ref. 5.1).

8.6.27 The Project includes some key changes to the airport (other than increased traffic flow) which affect ground noise impacts. It would be necessary to remove a bund at the western end of the northern runway in order to allow for alterations to taxiways. This bund currently provides mitigation for ground noise affecting properties in the Charlwood area and it would

be replaced with a longer (~500 metres) combination of bund and barrier shifted slightly north and west relative to the existing bund. To allow for usage of the northern runway, all taxiing from or to the western end of the runways would take place on Taxiway Juliet, which would have to be moved slightly further north to provide a safe distance between the taxiway and the northern runway in accordance with CAA/EASA regulations. In addition, the Project requires an extension to Taxiway Lima, which would join up to Taxiway Juliet providing the main route for all aircraft taxing to or from the western end of the runways. This extension to Taxiway Lima and the planned intensification of usage mean that a large number of taxiing aircraft would be routed further north and west than for previous operations, bringing ground noise sources closer to properties in the direction of Charlwood.

8.6.28 The overflights analysis contained within the air noise assessment has also been used in:

- **ES Chapter 7: Historic Environment** (Doc Ref 5.1) - assessment of impacts on sensitive heritage assets; and
- **ES Chapter 8: Landscape, Townscape and Visual Resources** (Doc Ref. 5.1) **-** assessment of tranquillity.

8.6.29 The results of the noise assessment have also been used in **ES Chapter 17: Socio-Economics** (Doc Ref. 5.1) to estimate health impacts and costs associated with the Project.

Mitigation

8.6.30 Mitigation and enhancement measures have been adopted as part of the Project to reduce the potential for impacts. These are described in Section 14.8 and 14.9 in **ES Chapter 14** (Doc Ref. 5.1) and include:

- **Construction Noise and Vibration** - for sensitive receptors affected, minimising working outside of daytime, weekday hours and avoiding use of percussive piling techniques where practicable. These measures will be secured through the **CoCP (ES Appendix 5.3.2)** (Doc Ref. 5.3). Measures include a commitment to the 'Section 61 process' to identify best practice mitigation on a detailed basis in advance of specific construction works – see further below.

- **Air Noise** – continuing the noise management systems already operated by GAL as set out in their Noise Action Plan (and detailed in **Section 14.8** in **ES Chapter 14** (Doc Ref. 5.1) and **ES Appendix 14.9.2 Air Noise Modelling** (Doc Ref. 5.3)). These include aircraft landing charges for the noisiest planes and operating; operating flights from the northern runway using procedures designed to minimise noise impacts, compliant with established noise abatement procedures and in line with the commitments of the Noise Action Plan; operating a system of Departure Noise Limits where airlines are fined if they exceed defined noise limits (fines are passed to the Gatwick Airport Community Trust); and the Noise Insultation Scheme (an enhanced scheme is proposed as part of the Project).

- **Ground Noise** - earthworks, bunding at least 8 metres in height situated at the western end of northern runway; noise barriers 10 metres in height adjoining the bund installed at the western end of the northern runway and running for approximately 500 metres to the north of the relocated Juliet taxiway and around the boundary of the relocated fire training ground; Museum Field Bund and ensuring that the acoustic design of plant and

fixed noise sources on buildings meet stipulated noise criteria. See **Table 14.8.3** in **ES Chapter 14** (Doc Ref. 5.1).

- **Road Traffic Noise** - alignment changes were made through consultation and optioneering of the road scheme design; the new right turn onto the A23 from the North Terminal Roundabout removes the current need for traffic wishing to turn right instead having to turn left up to the Longbridge roundabout, around it, and back down the A23, thus reducing traffic flows on this section of the A23; 1 metre noise barrier along the North Terminal roundabout flyover elevated section (facing Riverside Garden Park); 1 metre noise barrier along the South Terminal roundabout flyover elevated section, north side and traffic management and speed restrictions. See **Table 14.8.4** in **ES Chapter 14** (Doc Ref. 5.1). Following further assessment, a further noise barrier adjacent to Riverside Garden Park is not proposed as the assessments show that it is not required.

8.6.31 Further mitigation is proposed to reduce the noise and vibration effects from construction noise and vibration and air noise as follows (see Section 14.9 in **ES Chapter 14** (Doc Ref. 5.1)).

Construction Noise and Vibration

8.6.32 Construction would be undertaken in accordance with a CoCP. The CoCP sets out the key management measures that contractors would be required to adopt and implement. The ES provides a conservative assessment of the likely benefit of these measures including selecting quiet plant and noise barriers. These measures would be further developed by the contractor and submitted to the local authority for a prior consent pursuant to Section 61 of the Control of Pollution Act 1974 ('CoPA') to demonstrate that the best practicable means have been adopted to minimise noise.

8.6.33 As the construction methods are refined and known in more detail, the Section 61 process will be progressed, and the contractor will develop details of the scheme including the mitigation that will be adopted on site. Use of the Section 61 process ensures that construction work is carried out in accordance with best practicable means to minimise noise and with the agreement of the local authority, taking account of the nature of noise receptors close to the works and a detailed understanding of the proposed nature and duration of the works. As a result, noise from construction activities will be limited as far as practicable.

8.6.34 Noise insulation would also be offered for qualifying buildings, where after the application of best practicable means noise levels during construction are still predicted to exceed defined criteria consistent with those adopted on other large scale construction projects. Noise insulation or, if other measures are not possible, temporary re-housing would avoid residents being significantly affected by levels of construction noise inside their dwellings. The assessment provides an estimate of the buildings that are likely to qualify for noise insulation or to qualify for temporary rehousing, if any. Details of the qualifying criteria for noise insulation and temporary rehousing are given in the **CoCP** and summarised as follows:

- To be eligible a residential dwelling must be occupied and be one for which the predicted or actual noise exceeds any of the relevant thresholds for:

- a period of 10 or more days of working in any 15 consecutive days during construction; or for a total of 40 days or more in any 6 consecutive months during construction.

- The key qualifying noise levels are as follows.

  - Noise Insulation:
    - $L_{eq\ 10\ hr}$ day 75dB; and
    - $L_{eq\ 1\ hr}$ night 55dB.
  - Temporary Rehousing:
    - $L_{eq\ 10\ hr}$ day 85dB; and
    - $L_{eq\ 1\ hr}$ night 65dB.

8.6.35 These levels are increased if ambient noise levels are higher, as explained in the CoCP.

8.6.36 Qualification for noise insulation and, where appropriate, any temporary re-housing would be confirmed, as part of seeking prior consent from the local authority under Section 61 of the CoPA. Qualifying buildings would be identified, as required in the CoCP, so that noise insulation can be installed, or where appropriate any temporary re-housing provided, before the start of the works predicted to exceed noise insulation or temporary re-housing criteria.

Air Noise – Noise Insulation Scheme (NIS)

8.6.37 The current Gatwick NIS is based on a 60 dB L_{eq} contour. The extent of the scheme is shown as the red line in Figure 14.8.1. It is based on a future $L_{eq,\ 16\ hour}$ 60 dB contour forecast in 2014, with 15 km extensions from under the runway centrelines, and adjusted to accommodate various residential areas. There are about 2,000 homes within this area of which about 1,120 have taken up the scheme (November 2022). Within this zone residents are entitled to £4,300 towards acoustic glazing and doors. Under the existing Noise Action Plan commitments, GAL has reviewed the scheme, which has resulted in the offer being increased from £3,000 within the same zone. The NIS developed for the Project has taken on board the results of this review.

8.6.38 An enhanced NIS would be introduced for the Project to replace the current scheme and to address expected increases in air noise (see **ES Appendix 14.9.10 : Noise Insulation Scheme**) (Doc Ref. 5.3). The new scheme will offer additional mitigation for the housing already affected by noise, within two zones.

- Inner Zone
- Outer Zone

8.6.39 A new NIS Inner Zone would offer the highest level of noise insulation based on the predicted $L_{eq\ 16\ hr}$ 63dB daytime and $L_{eq\ 8\ hr}$ night 55dB summer air noise contours for 2032. The noise levels forecasts, for 2032, predict the following dimensions to these contours for the slower transition fleet case:

- $L_{eq,\ 16\ hour\ day}$ day 63 dB: 13.9 km2, approx. 600 people, 250 households; and
- $L_{eq,\ 8\ hour\ night}$ night 55 dB: 20.7 km2, approx.1,200 people, 400 households.

8.6.40 The NIS Inner Zone is formed by the larger of these, the $L_{eq, 8\ hour}$ night 55 dB contour, which fully encloses the $L_{eq, 16\ hour}$ day 63 dB contour. The NIS Inner Zone is shown as the black contour line in Figure 14.8.1 for the slower transition fleet case. Residential properties within this zone would be offered noise insulation in the form of replacement acoustic glazing or internal secondary glazing to all windows, acoustic ventilators and blinds to noise sensitive rooms (bedrooms, sitting rooms, dining rooms and studies), and replacement doors to noise sensitive rooms if necessary. Additionally, the offer would include acoustic upgrading of bedroom ceilings where practicable if they are found to be allowing more noise intrusion than the closed acoustic glazing provided. Overall properties in this new Inner Zone would receive a significantly improved level of noise mitigation. The level of noise mitigation offered to homes in the new Inner Zone exceeds that of the current NIS and homeowners who have taken up the current scheme would be entitled to upgrade to the new scheme. **ES Appendix 14.9.10 Noise Insulation Scheme** (Doc Ref. 5.3) provides further details of the scheme and how it would be administered. The noise insulation work would be carried out by GAL's contractor with the full cost being paid up to a maximum of £20,000, which is expected to be sufficient to provide a full package of sound insulation.

8.6.41 A new NIS Outer Zone would be created for homes within the forecast $L_{eq, 16\ hour}$ 54 dB daytime noise contour in 2032. This noise level was chosen in view of the Government consultation document "Aviation 2050 – The Future of UK Aviation"[64] which suggested that government policy might reduce the current minimum noise insulation standard of $L_{eq\ 16\ hr}$ 63dB in the APF to $L_{eq\ 16\ hr}$ 60dB, and best practice at UK airports. The new Outer Zone is shown in blue in **ES Chapter 14** on **Figure 14.8.1**. This zone would be extended where necessary (e.g. along the extended runway centreline to the west) to ensure it includes all properties within the current scheme. Approximately 3,900 homes are predicted to be within this zone and outside the Inner Zone so that in total approximately 4,300 homes will be offered noise insulation within the Outer and Inner Zones. This compares to approximately 250 home had the current APF standard of of $L_{eq\ 16\ hr}$ 63dB been adopted or approximately 550 homes if the $L_{eq\ 16\ hr}$ 60dB standard has been adopted. In the Outer Zone noise levels are modelled below SOAEL but residents would be offered acoustic ventilators to noise sensitive rooms. This would allow windows to remain closed with ventilation, which, with modern double glazed windows, would increase the sound attenuation of the window by more than 10 dB. For properties with older single glazed windows with poor acoustic performance, double glazed windows would be offered to noise sensitive rooms in addition to ventilators to ensure equivalent levels of protection. All homeowners in the Outer Zone who have taken up the current scheme would be entitled to upgrade to the new Outer Zone scheme, including the addition of acoustic ventilators to help reduce internal noise levels by allowing windows to remain closed in hotter weather. The appropriate package of measures will be developed and installed with GAL funding up to the following amounts, to be paid to the contractor appointed by GAL to carry out the works.

[64] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/769695/aviation-2050-web.pdf

- $L_{eq\ 16\ hr}$ 54 to 57 dB £3,500
- $L_{eq\ 16\ hr}$ 57 to 60 dB £5,000
- $L_{eq\ 16\ hr}$ 60 to 63 dB £8,000

8.6.42 A Schools NIS is proposed for all schools with noise sensitive teaching spaces within the forecast 2032 $L_{eq,\ 16\ hour}$ 51 dB noise contour. Where schools are concerned that aircraft noise could be affecting teaching, each classroom area would be surveyed to assess the effects of all types of noise including local road traffic. If noise insulation measures, such as improved glazing and acoustic air ventilation to reduce aircraft noise, would be practicable to implement, and would significantly improve the overall teaching conditions, then GAL would work with the school to deliver a suitable noise insulation package.

Air Noise - Home Owners Relocation Assistance Scheme

8.6.43 In order to offer home owners the option to move from the areas most affected by the highest noise levels, home owners within the $L_{eq,\ 16\ hour}$ 66 dB standard mode noise contour with the Project in operation would be offered a package to assist them in moving. Approximately 100 properties could be exposed to these noise levels by the peak year around 2032 but approximately 75 of these were already exposed to these noise levels in 2019 and only a small number are expected to take up the offer.

Air Noise - Monitoring Performance

8.6.44 This section summarises the existing noise reporting processes that GAL follows, that are expected to continue with the Project. GAL reports its air noise management performance through a number of mechanisms including:

- quarterly and annual Flight Performance Team (FPT) reports that provide information on performance against noise control measures;
- live online NTK; and
- annual Noise Contour Reports.

8.6.45 In addition to the above reporting, GAL also regularly engages with stakeholders including airlines, air navigation service providers, local community groups, local authorities, and Government bodies. This is done through various engagement forums such as the:

- Gatwick Airport Consultative Committee (GATCOM);
- GATCOM Steering Group;
- Noise and Track Monitoring Advisory Group (NaTMAG);
- Noise Management Board;
- Section 106 Steering Group; and
- The Gatwick Noise Monitoring Group.

8.6.46 Working with community noise groups and the Noise Management Board, GAL agreed to develop a process by which the noise change associated with the growth of the airport could be forecast for the coming years, and reported, to help manage the expectations of local residents, and to forecast future noise management performance. GAL would take forward this process as described in the next section (Noise Envelope).

Air Noise - Noise Envelope

8.6.47 The ongoing noise abatement measures adopted by GAL are summarised in **Section 14.8** in

ES Chapter 14.

8.6.48 There were a number of options considered for a noise envelope for the Project. Full details of the options considered and how the envelope has been developed taking account of stakeholder inputs, and within the ICAO balanced approach as required under EU Regulation No 598/2014, as adopted in UK law, are provided in **ES Appendix 14.9.5. Noise Envelope Background** (Doc Ref 5.3) and **ES Appendix 14.9.7 The Noise Envelope** (Doc Ref 5.3).

8.6.49 GAL proposes a noise envelope that sets limits in terms of the areas of the daytime LOAEL contour $L_{eq,\ 16\ hour}$ day 51 dB, and the night-time LOAEL contour $L_{eq,\ 8\ hour}$ night 45 dB. The LOAEL contours have been chosen because they represent the lowest level of observable adverse effects during the day and night and can be modelled with reasonable accuracy so as to provide forecasts of future performance.

8.6.50 The noise envelope is based on the noise modelling for the slower transition fleet that supposes the rate of fleet transition is delayed by about five years, particularly owing to uncertainties due to Covid-19. The slower transition fleet builds in assumptions that the noisiest aircraft currently flying at Gatwick are phased-out by the point the northern runway opens and that substantial investment in next generation aircraft will occur. GAL proposes to set the noise envelope to limit noise levels between opening of the northern runway and the peak noise year (2032) and then to set a lower noise envelope limit to provide certainty that noise levels would reduce over time. In summary, the terms of the Noise Envelope are as follows:

1st Noise Envelope Period: From commencement of dual runway operations to the end of the 1st Noise Envelope period

By the end of the first year after after the opening of the reconfigured northern runway pursuant to the Project, the area enclosed by the 92 day summer season average mode noise contours for the Airport shall not exceed the following:

- $L_{eq\ 16}$ hour day 51 dB 146.7 km^2
- Leq 8 hour night 45 dB 157.4 km^2

2nd Noise Envelope Period: From the end of the 1st Noise Envelope Period for the period of 5 years

Nine years after the opening of the reconfigured northern runway pursuant to the Project, or by the end of the year when annual commercial ATMs reach 382,000 (whichever is the sooner), the area enclosed by the 92 day summer season average mode noise contours for the Airport shall not exceed:

- Leq 16 hour day 51 dB 125.7 km^2
- Leq 8 hour night 45 dB 136.1 km^2

8.6.51 Whilst the air traffic forecasts used in the ES for the early years of operation are considered a reliable and robust basis for the noise envelope limits, projections for the longer term are inevitably less reliable. For this reason, the noise envelope limits are to be set for the first 14 years after opening within the DCO, to provide sufficient certainty of what will be achieved in the initial operating period, and every 5 years thereafter the limits will be subject to a review

and where appropriate revised. This will ensure the noise envelope remains current, being based on up to date reliable forecasting data. The process for submitting and approving a review, including how reviews may also be undertaken to reflect changing circumstances, is described in the **Noise Envelope (ES Appendix 14.9.7)** (Doc Ref 5.3).

8.6.52 The area of the Leq day and night contours would not exceed the limits above, and the noise envelope would provide certainty to the community that noise levels would be limited as the airport grows.

8.6.53 GAL will report on performance within the noise envelope annually and set in place internal management processes to forecast performance in the years ahead so as to pre-empt any potential non-compliance and put in place operating practices and measures to reduce noise before an exceedance arises. **ES Appendix 14.9.7: The Noise Envelope** (Doc Ref. 5.3) provides details of the proposed noise envelope and the processes through which it will be applied.

8.6.54 In consultation with airline, local authority and community group stakeholders GAL has developed a set of processes for forecasting and reporting performance within the noise envelope and to allow its limits to be reviewed, subject to independent scrutiny. Details of that consultation can we found in **ES Appendix 14.9.9: Report on Engagement on the Noise Envelope** (Doc Ref 5.3) The processes developed to manage compliance within the noise envelope are provided in **ES Appendix 14.9.7: The Noise Envelope** (Doc Ref 5.3) and summarised below.

8.6.55 Consultees, in particular those who feel L_{eq} noise metrics do not reflect their experience of aircraft noise, were keen to use additional noise metrics. The following supplementary noise metrics are included within the noise envelope. These do not have limits but are to be reported annually to provide further information on noise exposure, to track performance, and help pre-empt any non-compliance in future years:

- Airport Fleet Average Aircraft Noise L_{max} dB
- N65 Day 20 contour area
- N60 Night 10 contour area
- $L_{eq,\ 16\ hour}$ day 51 dB contour population
- $L_{eq,\ 8\ hour}$ night 45 dB contour population
- $L_{eq,\ 16\ hour}$ day 63 dB contour area
- $L_{eq,\ 8\ hour}$ night 55 dB contour area
- Annual $L_{eq,\ 16\ hour}$ day 51 dB contour area
- Annual $L_{eq,\ 8\ hour}$ night 45 dB contour area

8.6.56 In order to meet the objective of providing certainty on future noise levels, GAL will report compliance annually, and also forecast noise levels 5 years ahead to demonstrate expected compliance with the noise limits in the future. All noise metrics will be reported and the annual monitoring report will be submitted to the CAA who will provide scrutiny of the report as Independent Reviewer. The report will then only be approved when it shows that the forecasts will comply with the noise envelope limits.

8.6.57 As it is considered the proposed noise envelope may represent a noise operating restriction under EU Regulation No 598/2014, a review of the proposal in accordance with thos regulations has been undertaken. This review is provided in **ES Appendix 14.9.5. Noise**

Envelope Background (Doc Ref 5.3). It is for the Secretary of State for Transport, as the competent authority, to consider Gatwick's proposal for a noise envelope and other measures, and to conduct any consultation in accordance with the requirements of EU Regulation No 598/2014. It is anticipated that this consultation will be undertaken in parallel with the consultation and examination of the Application so as to ensure that the requirements of EU Regulation No 598/2014 in connection with the introduction of operating restrictions have been satsifed at the point at which any DCO is made and the noise envelope is secured by its requirements.

Summary of Effects

8.6.58 Section 14.9 in **ES Chapter 14** sets out the potential noise and vibration effects based on the construction period (including demolition) and the operational period based on the assessment years assuming embedded and further mitigation. This is summarised below.

Construction Noise and Vibration

8.6.59 Construction noise has been assessed based on the current design of the works, making a series of worst case approximations where necessary. Noise levels have been predicted for 24 stages of construction at 170 locations across the airfield and highway areas. Works required at night, such as those near the runway and taxiways, and main roadways, will give rise to the greatest potential noise impacts without mitigation around the airfield perimeter from 2026 to 2028 and around the main highway works between 2029 and 2032. The likely programme of day and night works has been analysed to make sure that cumulative noise from potentially overlapping works have been modelled and assessed.

8.6.60 Predicted noise impacts are based on assumed standard methods of working and assuming the best practicable means to reduce noise on site are adopted. The effect of site perimeter noise barriers has been assessed to mitigate four areas of noise impact. Overall, with mitigation the assessment results indicate that there is potential for significant adverse noise effects at approximately 37 properties during the day and approximately 10 during the night.

8.6.61 The **Code of Construction Practice (CoCP) (ES Appendix 5.3.2)** (Doc Ref. 5.3) places various requirements on the contractor to minimise and monitor noise and vibration, including using the best practicable means to reduce noise on site. The CoCP also requires the contractor to apply to the Local Authority to carry out the works under Section 61 of the Control of Pollution Act, which will require the contractor to demonstrate the proposed methods of working adopt the Best Practicable Means to minimise noise and vibration. That process should provide opportunities to limit further the extent of the temporary adverse effects.

8.6.62 The CoCP also provides for noise insulation to be offered above the SOAEL. The assessment identifies 10 properties that are likely to qualify for noise insulation due to night-time noise in the vicinity of highway works that must be done at night. The majority of night works required for the highways near residential properties are near Longbridge Roundabout and the Balcombe Road Bridge and are brief, programmed to be completed within 4 to 6 weeks. Taxiway construction and runway pavement works in the west of the airfield that may give rise to significant noise effects at night to the single property on Lowfield Heath Road south of Charlwood would take a total of approximately six months of night shifts to complete.

8.6.63 The Construction Noise Insulation Scheme is described in the CoCP and will be developed as the Project progresses, construction methods are refined, the Section 61 process is engaged, and the contractor develops details of the scheme. Noise insulation would then be offered to all qualifying properties so as to mitigate all significant effects above SOAEL.

8.6.64 The potential for impacts arising from construction traffic have been assessed as not significant.

8.6.65 Vibration has also been assessed as unlikely to give rise to significant effects.

8.6.66 Residual noise effects are likely and the magnitude of noise impact from construction is assessed as medium magnitude, which would give rise to a temporary moderate adverse significant effect.

Air Noise

8.6.67 Air noise has the potential to affect residents, and other NSRs over a wide area beyond the airport boundary. The assessment has included modelling changes in noise that can be expected over this area. It uses a number of noise metrics to quantify and characterise the changes in noise that are expected following established guidance, and also provides additional detail on the changes that are expected at representative communities and noise sensitive community buildings. Air noise modelling has been carried out by the CAA's Environmental Research and Consultancy Department (ERCD) and noise impacts would be greatest in the 2032 interim assessment year. After this, the effect of the aircraft fleet shifting to quieter types outweighs the effect in increasing ATMs.

8.6.68 The air noise assessment has considered the range of noise levels likely in each future assessment year, 2029, 2032, 2038 and 2047, that would result from the range of aircraft fleet that could operate. As aircraft age, airlines replace them with next generation aircraft so that over time the fleet transitions to next generation aircraft and, other things being equal, overall noise levels reduce. The ATM forecasts used for the modelling of noise in the future are based on estimates of how the fleet will transition based on assumptions around airlines' fleet procurement programmes and business models. The 'central case' used in the noise assessment is based on what was considered before the Covid-19 pandemic to be the most likely rate of fleet transition. However, there is uncertainty around this, particularly at the current time due to effect of the global pandemic and the financial impact on the airlines. Therefore, noise modelling has also been carried out for a 'slower transition fleet' case, based on ATM forecasts in which the rate of fleet transition is delayed by about five years and which would result in higher noise levels than the central case.

8.6.69 The existing northern runway centreline is located some 198 metres north of the main runway centreline. The Project would increase the difference between the two runway centrelines by 12 metres. The existing northern runway is currently only used when the main runway is unavailable; for example, due to maintenance work at night. In the 2019 summer season (16 June to 15 September), the northern runway was used by 1,292 flights. From January to November 2022 the northern runway was used on 160 days by over 9,500 flights due to a major resurfacing programme on the main runway. The Project would make alterations to the existing northern runway, resulting in increased use of this runway using the same flight paths offset 12 metres to the north. The smaller ICAO 'Code C' aircraft (ie <36 metre wingspan (not larger types, eg B787 and A350)) would use the northern runway

when it was in coordinated use with the main runway. Given the close proximity between the existing and proposed runway centrelines, and the fact that the existing northern runway is already in regular (if limited) use, any noise impacts of the Project would not be over areas currently unaffected by noise from Gatwick. This would therefore avoid most of the noise impacts often associated with new flight paths which are routed over areas not previously overflown.

8.6.70 In the noisiest year 2032, the population within the daytime LOAEL $L_{eq,\ 16\ hour}$ day 51 dB contour is predicted to rise from between 16,100 to 23,500 (the ranges provided cover the range of noise levels arising from the central case and slower transition fleet cases) in the base case to between 18,800 to 26,400 with the Project, and to remain below the 24,050 in 2019 except in the slower transition fleet case. Thus the Project is predicted to increase the population within the LOAEL $L_{eq,\ 16\ hour}$ day 51 dB contour by between 2,700 to 2,900 people in 2032. However, the majority (61 to 68% for daytime and 97 to 99% for night-time) of those affected would experience a change of less than 1 dB which is assessed to be negligible. Approximately 1,800 to 4,900 people living to the south of the airport would see noise levels reduce, with 1,200 to 4,300 of these being negligible (<1 dB) and about 600 low (1-3 dB).

8.6.71 To the north and in the Smallfield area to the north east, approximately 4,800 to 6,500 people are predicted to experience 1 to 2 dB increases in daytime noise, which is likely to result in minor adverse and not significant effects. The majority of the residential properties in this area would be eligible for the new Outer Zone NIS, which would further reduce noise effects in this area.

8.6.72 To the west, approximately 300 to 400 people are expected to experience noise increases in daytime of 2-3 dB, which are likely to be minor adverse and not significant effects. All the residential properties in this area would be eligible for the new Outer Zone NIS, which would further reduce noise effects in this area.

8.6.73 To the west of the western end of the northern runway approximately 40 properties on Ifield Road and near Russ Hill have been identified as experiencing daytime noise increases above 3 dB, above the daytime SOAEL which are major significant effects without consideration of mitigation. A further approximately 40 properties are predicted to have daytime noise increases of greater than 1dB above SAOEL, in Russ Hill and Partridge Lane to the West and on Balcombe Road and Peeks Brook Lane to the East, which are major adverse significant effects.

8.6.74 The total number of properties with major adverse significant effects before the application of mitigation is approximately 80, or approximately 210 people.

8.6.75 Noise changes at night would be lower than during the day because it is assumed that the current night restrictions would continue to cap aircraft numbers in the 23:30-06:00 hours period. In 2032, the population within the SOAEL $L_{eq,\ 8\ hour}$ night 55 dB contour is predicted to rise from a range of approximately 900 to 1,100 in the base case, by approximately 160 with the Project, but to remain below the population in 2019 when it was approximately 1,250. The areas within the day and night SOAEL contours overlap and all those significantly affected at night are also significantly affected during the day, so the total number of people significantly affected day or night is approximately 210, as reported above for daytime,

8.6.76 All residential properties forecast to be within the $L_{eq\ 16\ hour}$ day 63 dB or the $L_{eq\ 8\ hour}$ night 55 dB slower transition fleet SOAEL contours would be eligible for full noise insulation under the new Inner Zone NIS, to mitigate the predicted significant effects. The extent of the NIS is shown in Figure 14.8.1. All the properties at which adverse significant effects are predicted (approximately 80 properties, 210 people, described above) are within this NIS inner zone and so would be eligible to apply. The Noise Insulation Scheme inner zone would avoid noise impacts indoors, including sleep disturbance and disturbance to noise sensitive activities during the day such as working reading etc, and is consistent with policy in the first aim of the NPSE to avoid significant effects on health and quality of life. However, at these approximately 80 properties (approximately 210 people) increases in daytime noise levels of greater than $L_{eq\ 16\ hour}$ 1dB are expected above SOAEL, and noise insulation would not reduce noise levels outside, so some disturbance in outside activities is likely which is expected to result in moderate adverse significant effects in these areas.

8.6.77 50 noise sensitive community buildings within the $L_{eq,\ 16\ hour}$ day 51 dB noise contour in 2032 with the Project have been assessed. These comprise 21 schools, one hospital, 18 places of worship and seven community buildings. At two places of worship in Crawley noise levels are expected to reduce by 1-2 dB. At 42 of these buildings noise levels are predicted to either decrease or increase by less than 1 dB, i.e. a negligible increase, as a result of the Project compared to the 2032 baseline, with low increases of 1-2 dB at the others. A noise insulation scheme has been included for any school adversely affected.

8.6.78 The assessment of significant effects is based primarily on the predicted levels and changes in the primary noise metrics, $L_{eq,\ 16\ hour}$ day and $L_{eq,\ 8\ hour}$ night, but additional noise metrics are used to provide more detail on the changes that would arise. Number Above metrics N65 and N60 night show how the numbers of aircraft above Lmax 65 dB and Lmax 60 dB are expected to change. Seven Community Representative Locations have been used to illustrate the effects on the most populated areas affected by aircraft noise. The European metrics L_{den} and L_{night} have also been used to report air noise changes as annual averages for day evening and night and also separately for night. A physiological sleep disturbance study has been undertaken which concludes that even in the area of greatest noise increase beyond the west end of the Northern Runway there would be no more than one additional 'awakening' per summer night per person as a result of the Project, in the population in that area overall. An 'awakening' in this study means a change of sleep state, not waking up, and an average healthy person awakens about 20 times a night for various reasons not connected with noise.

8.6.79 Beyond the noise contours, the extent to which the number of overflights below 7,000 feet would change have been computed to give stakeholders further from the airport information on how many more aircraft would overfly them as a result of the Project.

8.6.80 A noise envelope is proposed to set limits on noise from future operations at the airport in terms of the areas of $L_{eq,\ 16\ hour}$ day and $L_{eq,\ 8\ hour}$ night noise contour. Noise limits are proposed for two periods, first for the period from when the northern runway opens up to when the noise impacts are expected to be greatest about three years later, and second for when the airport grows to operate at 382,000 commercial ATMs or by the end of the ninth year of opening, and thereafter. The latter noise contour areas are smaller. The area of the Leq day and night contours would not exceed these limits, and the noise envelope would

provide certainty to the community that noise levels would be limited and would reduce in the future. Compliance with the Noise Envelope would be assessed every year and reported in an annual monitoring report along with forecasts for future compliance up to 5 years ahead. This would ensure that GAL is planning its operations to stay within the noise envelope limits and is planning ahead for any measures required to remain in compliance.

8.6.81 Following 9 years after opening and every five years thereafter, the noise envelope would be subject to review in light of circumstances prevailing at the time, to ensure it remains relevant. The CAA would act as Independent Reviewer to scrutinise annual compliance reports and reviews of the noise envelope contours. **ES Appendix 14.9.7: The Noise Envelope** (Doc Ref 5.3) provides details of the noise envelope, the options considered through stakeholder consultation are discussed in **ES Appendix 14.9.5: Noise Envelope Background** (Doc Ref 5.3), **ES Appendix 14.9.8: The Noise Envelope Group Output Report** (Doc Ref 5.3) and **ES Appendix 14.9.9: Report on Engagement on the Noise Envelope** (Doc Ref 5.3).

Changes in the Number of Overflights

8.6.82 The Project does not change airspace routings, however, close to the extended northern runway centreline, such as in the area south of Charlwood, there are areas that are currently 'overflown' only when the northern runway is used during maintenance/standby use, and that would be routinely overflown when the northern runway is in use daily.

8.6.83 **Figures 14.6.7 to 14.6.9** in **ES Chapter 14** show the baseline modelling of overflights in 2019, with **Figure 14.6.7** showing all flights within 35 miles of Gatwick below 7,000 feet above ground level. In Figure 14.9.29 the number of Gatwick flights has been increased by 20% on the 2032 baseline while keeping all other baseline parameters (non-Gatwick flights and their airspace routings) the same. The 20% increase in flight movements equates to approximately the increase to summer season traffic in the future 2032 with the Project scenario compared to the 2032 future baseline (see **ES Appendix 14.9.2 Air Noise Modelling** for further details).

Ground Noise

8.6.84 Ground noise from aircraft taxiing and within the airfield has been modelled using a model calibrated with measurements made on the airfield in spring 2019 and baseline measurements made at 13 representative receptors across 12 assessment areas. The increase in numbers of aircraft and the addition of taxiways closer to neighbouring properties to the north has the potential to lead to noise increases, and mitigation has been incorporated including: bunding 8 metres in height situated at the western end of northern runway, and noise barriers 10 metres high adjoining the bund installed at the western end of the northern runway and running for approximately 500 metres just to the north of the relocated Juliet Taxiway.

8.6.85 For daytime, the results show predicted ground noise effects would not be significant (negligible or minor) at 9 of the representative receptor areas studied, with moderate adverse effects within the three remaining receptor areas during the day. The effects rated as moderate are considered significant and these are predicted in the Charlwood Road, Lowfield Heath and Rowley Farm assessment areas, covering up to 22 properties of the 3,176 properties considered in these assessment areas.

8.6.86 For night-time the results show predicted ground noise effects would not be significant (negligible or minor) at 7 of the representative receptor areas studied with significant adverse effects within 5 receptor areas during the night. The effects, rated as moderate or major, are considered significant and these are predicted in the Charlwood, Charlwood Road, Povey Cross, Lowfield Heath and Rowley Farm assessment areas, covering up to 37 properties of the 3176 properties considered in these assessment areas.

8.6.87 There are 20 properties, 2 in the Charlwood receptor area, 8 on Charlwood Road, and 10 in the Lowfield Heath receptor area, where the effects are rated as major above SOAEL. For these the Noise Insulation Scheme inner zone insulation package would avoid noise impacts indoors, including sleep disturbance and disturbance to noise sensitive activities during the day such as working reading etc, and is consistent with policy in the first aim of the NPSE to avoid significant effects on health and quality of life. However, noise insulation would not reduce noise levels outside and so some disturbance in outside activities is likely which will potentially result in moderate adverse significant effects in these areas.

8.6.88 Up to 17 properties in the Povey Cross and Rowley Farm receptor areas will potentially experience moderate adverse significant effects due to increases in ground noise below SOAEL. These would be offered noise insulation within the NIS outer zone which would help to reduce noise levels indoors and reduce these noise impacts.

8.6.89 In total, although noise insulation will partly mitigate the effects, potential residual significant adverse effects are predicted at 37 properties.

Road Traffic Noise

8.6.90 A construction traffic noise assessment was undertaken in accordance with the Design Manual for Roads and Bridges (DMRB) methodology which considered three main scenarios where peak changes in road traffic are excepted due to peaks in the constriction works taking place and traffic management measured on the highways creating diverted traffic. No significant effects were predicted.

8.6.91 A detailed noise model has been used to predict noise levels from the operation of the highway scheme and to compare them to the do-minimum in 2032 and 2047 as required by the DMRB methodology. Noise mitigation including noise barriers, traffic management and speed reductions have been incorporated into the highway design. The scheme reduces traffic numbers on the A23 past the northern part of Riverside Garden Park by allowing traffic to turn right as it exits the North Terminal rather than turning left, passing around Longbridge Roundabout and doubling back sothwards down the A23. This ensures that at most receptors, including the two Noise Important Areas, noise levels would reduce or have a negligible effect as a result of the Project. The numbers of properties affected by the different noise changes has been assessed, and it is concluded that the adverse effects are of negligible or minor magnitude in most areas, with benefits in other areas within the study area. No significant effects were predicted.

8.6.92 Noise levels on other roads beyond the highway works could be changed by traffic changes resulting from the Project. Modelling indicated these noise changes would be insignificant.

Planning Policy Compliance

8.6.93 GAL fully recognises that the impact of noise from the Project is a key concern for those

communities that will be affected – as was demonstrated by the number of responses received to the consultation events on this matter. However, GAL has demonstrated a very successful track-record to date in terms of monitoring, reducing and mitigating against noise and will continue to build on this success by enhancing schemes already in place and introducing new measures to reduce and mitigate against adverse effects of the Project.

8.6.94 GAL has taken the noise assessment carried out for the Project very seriously through conducting thorough and extensive modelling which considers all the main sources of noise emissions from the airport, ground operations, construction and surface transport. The assessment has been carried out in accordance with all relevant guidance and Government's policy.

8.6.95 The requirements set out in the ANPS and NNNPS for noise assessment have been fulfilled. Additionally, the assessment has considered how, and made allowances for new technology and quieter aircraft so that noise exposure in the future can be properly planned for.

8.6.96 The Project will result in some negative impacts from noise (allowing for a reasonable worst case) even once embedded and further mitigation is applied, as summarised in the table below (Table 8.1):

Table 8.1: Summary of Significant Residual Noise and Vibration Effects

Description of Significant Effect	Receptor	Significance
Construction Noise, short term	Approximately 37 properties, daytime	Moderate, Significant
Aircraft Noise, permanent	Approximately 80 properties, daytime	Moderate, Significant
Ground Noise, permanent	Approximately 37 properties, daytime	Moderate, Significant

8.6.97 The air noise impacts of the Project are considered small, considering the additional air capacity released, compared to the impacts that could arise from other schemes delivering equivalent capacity. This is in part because of the mitigation measures included and also because the population densities around Gatwick airport are smaller than other airports.

8.6.98 In considering options for noise mitigation, GAL has considered the concept of a 'Balanced Approach', referred to in EU Regulation 598/2014. A range of noise mitigation measures have been considered and the most appropriate and effective package of measures have been selected in consultation with local communities and key stakeholders. This includes plans for a noise envelope which could become a noise related operating restriction under the EU Regulation. The other measures included in the noise mitigation package which will include an enhanced Noise Insulation Scheme and an enhanced Home Owners Relocation Assistance Scheme and noise-reducing measures to be applied during the construction phase through the CoCP will ensure that the noise impact of the Project is limited. All of these measures represent best practice and the noise insulation scheme goes beyond government policy requirements. The package of noise measures, and in particular the noise envelope, allows for a balance to be struck between the economic benefits to communities from permitting growth and the noise impacts of doing so, and is consistent with the

Government's March 2023 Overachieving aviation noise policy statement: *The impact of aviation noise must be mitigated as much as is practicable and realistic to do so, limiting, and where possible reducing, the total adverse impacts on health and quality of life from aviation noise*.

8.6.99 The noise mitigation package proposed will ensure that there is effective management and control of noise within the context of Government policy. Significant adverse effects on health and quality of life from noise will be avoided by the measures proposed including noise insulation, consistent with the first aim of the NPSE, and will also minimise adverse effects as required by the second aim of the NPSE. Mitigation measures have also been included to contribute to the improvement of health and quality of life as required by the third aim of the NPSE, including the enhanced noise insulation scheme that will be offered to properties already affected by aircraft noise over a wider area than the current scheme regardless of if the Project increases or reduces levels of aircraft noise. Vibration impacts are not expected to be significant. In accordance with the NNNPS, the Project has been designed to ensure that the scheme layout has been optimised to minimise noise emissions including through the use of landscaping, bunds and noise barriers to reduce noise transmission.

8.6.100 It has been demonstrated that the Project accords with the relevant planning policies and other provisions governing noise. It is recognised that even when allowing for a reasonable worst case, that there will be an increase in air noise, ground noise and construction noise. The mitigation measures outlined above will mitigate negative effects as far as reasonably practicable. Moderate negative weight should be afforded in the planning balance.

8.7 Greenhouse Gas Emissions

Legislative Context

8.7.1 The legislation relevant to the assessment of Greenhouse Gas (GHG) is set out in **Section 16.2** in **ES Chapter 16: Greenhouse Gases** (Doc Ref. 5.1). This explains the effect of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017; Climate Change Act 2008; the Air Navigation (Carbon Offsetting and Reduction Scheme for International Aviation) (CORSIA) Order 2021 and the Greenhouse Gas Emissions Trading Scheme Order 2020 as amended by the Greenhouse Gas Emissions Trading Scheme (Amendment) Order 2022.

Policy Context

8.7.2 **Section 6** of this **Planning Statement** sets out the key policy objectives of the Government's framework and plan for achieving net zero aviation by 2050 as set out in the DfT's publication 'Jet Zero Strategy: Delivering Net Zero Aviation by 2050' (2022). The Jet Zero Strategy has been developed to secure a more sustainable future for the climate but also for the aviation industry, recognising the critical role it plays in boosting trade, tourism and travel. The strategy is underpinned by an overarching approach and three principles. The Government has set clear strategic decarbonisation goals; in addition to the 2050 net zero target, all domestic flights are to achieve net zero by 2040 and all airport operations in England are to be zero emission by the same year (paragraph 3.3).

8.7.3 The Government fully recognises that decarbonising aviation will be a challenge with solutions at different stages of technological and commercial readiness and that significant changes need to be made in the coming decades to reduce its emissions. It also notes that meeting this challenge is vital for UK connectivity and growth but makes clear that the Government is determined to meet the challenge through a range of market mechanisms and other measures.

8.7.4 Not only has the UK become the first country in the world to set a legally binding net zero commitment for greenhouse gas emissions in 2050, it has also set a carbon budgeting process - both of which now include the UK's share of international aviation emissions. The Sixth Carbon Budget, covering the period 2033-37[65], was adopted by the UK Government in 2021. It formally includes emissions from international aviation within the overall target of 965 million tonnes of carbon dioxide equivalent ($MtCO_2e$).

8.7.5 The Government makes clear in the Jet Zero Strategy that it will continue to support sustainable airport growth (page 10, Executive Summary) and that it sees no role for demand management. The Strategy states that the sector can achieve Jet Zero without the Government needing to intervene directly to limit aviation growth. It also notes that its underlying analysis indicates that current UK airport expansion plans (which include the NRP) can be accommodated within the planned trajectory for net zero emission by 2050. Paragraph 3.57 states:

> '*…we can achieve Jet Zero without the Government needing to intervene directly to limit aviation growth. The analysis uses updated airport capacity assumptions consistent with the latest known expansion plans at airports in the UK.'*

8.7.6 Consequently the Jet Zero Strategy confirms that the Government's aviation policy frameworks remain compatible with the UK's climate change obligations.

8.7.7 An important element of the Jet Zero Strategy is that the emissions trajectory for the aviation sector will be monitored on an annual basis whilst the Strategy itself will be reviewed every five years. This acknowledges that decarbonisation will rely on new technologies which require time to develop and test. However, the Strategy explains (for example, on page 10) that the Government will intervene with new measures if the sector is not meeting its emissions trajectory.

8.7.8 Paragraphs 5.69 to 5.83 of the ANPS relate to carbon emissions. Paragraph 5.70 states that the Government's key objective on aviation emissions, as outlined in the Aviation Policy Framework, is to ensure that the aviation sector makes a significant and cost-effective contribution towards reducing global emissions.

8.7.9 Paragraph 5.74 of the ANPS confirms that the carbon impact of an aviation development falls into four areas: increased emissions from air transport movements (both international and domestic) as a result of increased demand, emissions from airport buildings and ground operations, emissions from surface transport accessing the expanded airport, and emissions

[65] [redacted]

caused by construction. Paragraph 5.76 requires the Applicant to provide evidence of the carbon impact of the project (including embodied carbon), both from construction and operation, such that it can be assessed against the Government's carbon obligations, including but not limited to carbon budgets. The ANPS continues by stating that the Applicant should quantify the greenhouse gas (GHG) impacts before and after mitigation to show the impacts of the proposed mitigation. This will require emissions to be split into traded sector and non-traded sector emissions, and for a distinction to be made between international and domestic aviation emissions. Paragraph 5.77 requires that the Applicant's assessment should seek to quantify impacts from emissions from surface access due to airport and construction staff; airport passengers/visitors; energy and fuel use and freight and retail operations and construction site traffic.

8.7.10 Paragraph 5.78 of the ANPS states that the SoS will need to be satisfied that the mitigation measures put forward by the Applicant are acceptable, including at the construction stage. It suggests a management/project plan may help clarify and secure mitigation and that the Applicant is expected to take measures to limit the carbon impact of the project.

8.7.11 Paragraph 5.82 of the ANPS importantly states that any increase in carbon emissions alone is not a reason to refuse development consent, unless the increase in carbon emissions resulting from the project "*is so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets, including carbon budgets*". This policy test is repeated in paragraph 5.18 of the NNNPS albeit that paragraph 5.17 of the NNNPS states that it is very unlikely that the impact of a road project will, in isolation, affect the ability of Government to meet its carbon reduction plan targets.

8.7.12 Paragraph 5.83 of the ANPS states that evidence of appropriate mitigation measures (incorporating engineering plans on configuration and layout, and use of materials) in both design and construction should be presented as part of any application for development consent. The SoS will consider the effectiveness of such mitigation measures in order to ensure that, in relation to design and construction, the carbon footprint is not unnecessarily high. The SoS's view of the adequacy of the mitigation measures relating to design, construction and operational phases will be a material factor in the decision-making process. This requirement is repeated in paragraph 5.19 of the NNNPS.

8.7.13 Paragraph 8 of the NPPF states that, in order to achieve sustainable development, there is a need to protect and enhance the natural, built and historic environment including mitigating and adapting to climate change and moving to a low carbon economy. Section 14 of the NPPF relates to meeting the challenges of climate change and states that the planning system should help to shape places in ways that contribute to radical reductions in GHG emissions and support renewable and low carbon energy and associated infrastructure (paragraph 152). Paragraph 154 states that new development should be planned for in ways that reduce GHG emissions. Paragraph 155 supports the increased use and supply of renewable and low carbon energy and heat.

Assessment

8.7.14 **ES Chapter 16: Greenhouse Gases** (Doc Ref. 5.1) provides an assessment of the Project on the global atmosphere resulting from the generation of GHG emissions. The assessment adopts the definition of GHGs used in the Kyoto Protocol – that is carbon dioxide (CO_2),

methane (CH_4), nitrous oxide (N_2O), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), sulphur hexafluoride (SF_6) and nitrogen trifluoride (NF_3). In the assessment, and in this section of the Planning Statement, the term 'carbon' has been used as shorthand to refer to all GHG emissions.

8.7.15 The assessment considers carbon emissions from four groups of activities:

- **Construction** - arising from the extraction, processing and manufacture of construction materials; transportation of these materials; the energy and water used during construction processes; transport and disposal of waste; and transport of construction workers. This category also considers impacts from land use change arising from the Project.
- **Airport Buildings and Ground Operations (ABAGO)** - energy use for buildings, infrastructure and operations to provide heating, cooling, lighting and power needs; fuels for airside and landside vehicles; electricity transmission and distribution emissions; refrigerant losses; fuels for fire training; water consumption and treatment; and operational waste disposal and treatment.
- **Surface Access (Transport)** - of passengers, staff and freight accessing the airport.
- **Aviation -** emissions from air traffic movements, emissions from aircraft on the ground, in the Landing and Take-off (LTO) cycle, in Climb-Cruise-Descent (CCD) stage, and use of aircraft fuel for fire training and engine testing.

8.7.16 The methodology for the carbon assessment is set out in **Section 16.4** in **ES Chapter 16.** Further details on the adopted methodology are set out in **ES Appendix 16.9.1 Assessment of Construction Greenhouse Gas Emissions; ES Appendix 16.9.2 Assessment of Greenhouse Gas Emissions for ABAGO; ES Appendix 16.9.3 Assessment of Surface Access Greenhouse Gas Emissions** and **ES Appendix 16.9.4 Aviation Greenhouse Gas Emissions** (all Doc Ref. 5.3).

8.7.17 Given the Government's commitment to meet its carbon reduction targets and its declared policy to take action to ensure that the necessary trajectory of downward emissions from aviation (and other sectors) is met, for aviation the assessment adopts the 'High Ambition' scenario set out in the Jet Zero Strategy. The assessment methodology, therefore, applies 'trends' (or assumptions) that anticipate future development in the aviation sector e.g. in relation to fleet efficiency improvements, SAF take-up – 10% by 2030, 22% by 2040 and 50% by 2050 etc.

8.7.18 A comparable approach is adopted for surface access, where the assessment assumes that transport related carbon will follow the trajectory assumed and required by the Government's Transport Decarbonisation Plan (the TDP).

8.7.19 This is consistent with Government policy and also, for instance, with the approach taken in the most recent decision made by the SoS in relation to airport development – the decision of 18 August 2022 to grant DCO consent to proposals at Manston Airport [66], in which the SoS made clear:

[66] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-006369-220818%20-%20Manston%20Airport%20PA08%20Decision%20Letter.pdf

> *"149. …..the SoS is satisfied that Government's Transport Decarbonisation Plan and the Jet Zero Strategy, which set out a range of non-planning policies and measures that will help accelerate decarbonisation in the aviation sector, will ensure Government's decarbonisation targets for the sector and the legislated carbon budgets can be met without directly limiting aviation demand."*

8.7.20 The main assumptions that have informed the development of the future scenario carbon estimates are set out in **Table 16.5.1** in **ES Chapter 16**. Those assumptions include the commitments made by GAL in its **Carbon Action Plan (CAP)** provided as **ES Appendix 5.4.2** (Doc Ref. 5.3) and its **Surface Access Commitments (SAC)** provided as **ES Appendix 5.4.1** (Doc Ref. 5.3).

8.7.21 The **CAP** sets out binding commitments relating to three of the principal aspects of airport development which the ANPS identifies as important to the generation of carbon emissions: construction, ABAGO and aviation. The **SAC** sets out commitments for the fourth aspect: surface access.

8.7.22 The **CAP** provides the framework under which GAL commits to manage and reduce carbon emissions, and it incorporates a range of commitments across the different emissions activities set out in the GHG assessment. Given the rapid development of emerging techniques and technologies for carbon reduction, the **CAP** and the **SAC** do not commit to a blueprint of specific measures – rather, such measures are identified as a menu of actions from which measures can be drawn to ensure that the binding commitments to outputs are achieved. The commitments made in both documents are assessed as part of the GHG assessment for the Project as they provide "committed goal(s) that (are) secured, e.g. forming part of the description of development, a specific planning condition/requirement, or a legal agreement" in accordance with the relevant IEMA Guidance.[67]

8.7.23 **F**or the categories of construction, ABAGO and Surface Access, the assessment quantifies carbon then contextualises this against UK Carbon Budgets and relevant sectoral carbon trajectories. The scale of carbon emissions represents a small proportion of those budgets (see Tables 16.9.4, 16.9.6 and 16.9.8) and the with Project projected carbon emission align with net zero trajectories out to 2050 (see Diagrams 16.9.1 and 16.9.2).

8.7.24 The methodology and the approach to the assessment of significance is consistent with the approach recommended in the IEMA Guidance. The guidance recognises that all new carbon emissions contribute to a negative environmental impact, but the significance of a project's impacts should be based on its net impact over time (IEMA paragraph 6.1). The Guidance advises, therefore, that impacts should be seen in the context of wider policy initiatives and particularly the staged reductions in emissions to which the Government is committed through the UK Carbon Budgets. Accordingly, "*a key goal of EIA is to inform the decision maker about the relative severity of environmental effects such that they can be weighed in a planning balance. Therefore, it is essential to provide context for the magnitude*

[67] Institute of Environmental Management & Assessment (IEMA) Guide: Assessing Greenhouse Gas Emissions and Evaluating their Significance; February, 2022.

of carbon emissions reported in the EIA in a way that aids evaluation of these effects by the decision maker". As the Guidance explains:

> "*The crux of significance therefore is not whether a project emits GHG emissions, nor even the magnitude of GHG emissions alone, but whether it contributes to reducing GHG emissions relative to a ce baseline consistent with a trajectory towards net zero by 2050."* (IEMA paragraph 6.2)

8.7.25 As a result, a project that follows a 'business-as-usual' or 'do minimum' approach and is not compatible with the UK's net zero trajectory, or accepted aligned practice, results in a significant adverse effect. However, a project that is compatible with the budgeted, science based 1.5°C trajectory (in terms of rate of emissions reduction) and which complies with up-to-date policy and 'good practice' reduction measures to achieve that has a minor adverse effect that is not significant.

8.7.26 Each aspect (construction, ABAGO and surface access) is considered in turn, with particular attention paid to the facts that:

- impacts are very small as a proportion of Carbon Budgets;
- the commitments made as part of the Project through the CAP and the SACs align with or exceed those required by current Government policy;
- for example, the construction commitments in the CAP reduce business as usual carbon by 17% and commit to a range of measures to further embed best carbon practice and encourage further carbon savings;
- the surface access commitments replicate or exceed best practice by limiting the use of the car, optimising other modes and investing in public transport and active travel – as well as deploying other measures to reduce car use, such as forecourt charging; parking enforcement etc;
- the commitments for ABAGO exceed the expectations of the Jet Zero Strategy by committing to carbon neutral in 2030, well ahead of the target date of 2040; and
- the trajectory for the decarbonisation of car travel assumes that required by and committed by the TDP.

8.7.27 Accordingly, the assessment concludes that the impacts for these aspects are not significant.

8.7.28 Aviation accounts for the largest proportion of carbon dioxide emissions generated by the Project. Emissions are calculated and assessed in the context of UK Carbon budgets (Table 16-27). At its highest, the net contribution from the Project is 0.576% of the 6th Carbon Budget. This value is assessed prior to the use of any abatement outside of the aviation sector (i.e. offsetting, removals) that may arise under the Jet Zero Strategy.

8.7.29 The assessment recognises that control over aviation emissions is a matter for which the Government has taken responsibility and which it has committed to enforce. Airports can play their part and the CAP confirms GAL's commitment to do so; including its commitment to ensure that Gatwick Airport is consistently 'Jet Zero ready', i.e. that Gatwick will ensure that it can continue to host its airline community as their fleets change to meet the trajectory

to net zero. GAL is aware that this will require continuous monitoring of developments, for example, changing fuel and engine types and that accommodating the changes is likely to require continuous investment at the airport. The GAL Board has been fully informed and has established a reporting procedure to ensure that the necessary timely investments can be planned and executed. Accordingly, the assessment concludes that aviation related carbon impacts will also be not significant.

8.7.30 Comparative **ES** The question of the weight to attach to carbon impacts against the background of the Government's commitments was considered directly by the SoS in his decision on plans at Manston Airport.[68] As set out above, at paragraph 149 of his decision letter, the SoS confirmed that he is satisfied that Government's Transport Decarbonisation Plan and the Jet Zero Strategy, which set out a range of non-planning policies and measures that will help accelerate decarbonisation in the aviation sector, will ensure Government's decarbonisation targets for the sector and the legislated carbon budgets can be met without directly limiting aviation demand. The decision letter then continued:

> *"For this reason, he does not accept the Examining Authority's view that carbon emissions is a matter that should be afforded moderate weight against the Development in the planning balance, and considers that it should instead be given neutral weight at the most*."

Policy Compliance

8.7.31 In accordance with the requirements of paragraphs 5.76 and 5.77 of the ANPS, evidence has been provided of the carbon impacts of the project (including embodied emissions), both from construction and operation, such that it can be assessed against the Government's carbon obligations, including but not limited to carbon budgets. The carbon impacts have been quantified before and after mitigation to show the impacts of the proposed mitigation.

8.7.32 The Project is not so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets, including Carbon Budgets in line with paragraph 5.82 of the ANPS and 5.17 of the NNNPS. It therefore represents sustainable airport growth which is supported by the Jet Zero Strategy.

8.7.33 That conclusion is consistent with the assessment which lies behind the Jet Zero Strategy (see Sections 3 and 6 in this Statement), which identify how the modelling which supports the Jet Zero Strategy takes account of planned capacity improvements at UK airports, including the NRP at Gatwick.

8.7.34 The mitigation and controls to which GAL has committed are best practice and are directly consistent with policy expectations (for example in the ANPS at 5.78) to take measures to limit carbon impact so that airports play their part in the journey to net zero.

8.7.35 Given that the Project is not so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets, and in accordance with paragraph 5.82 of the ANPS and paragraph 5.17 of the NNNPS, the increase in carbon emissions that is

[68] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-006369-220818%20-%20Manston%20Airport%20PA08%20Decision%20Letter.pdf

predicted cannot be a reason for refusing development consent on its own. The matter should not, therefore, be afforded significant weight in the planning balance.

8.8 Climate Change Adaptation

Policy Context

8.8.1 Climate change adaptation is defined in the NPPF as adjustments made to natural or human systems in response to the actual or anticipated impacts of climate change, to mitigate harm or exploit beneficial opportunities. The NPPF defines climate change mitigation as action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.

8.8.2 Paragraphs 4.41 to 4.52 in the ANPS sets out how the NPS puts Government policy on climate change adaptation into practice, and in particular how the Applicant and the SoS will take into account the effects of climate change when developing and considering airports infrastructure applications. Paragraph 4.42 in particular states that climate change mitigation is essential to minimise the most dangerous impacts of climate change. Paragraph 4.45 states that any accompanying ES should set out how the proposal will take account of the projected impacts of climate change using the latest UK Climate Projections available at the time. Paragraph 4.48 states that the Applicant should demonstrate that there are no critical features of infrastructure design which may be seriously affected by more radical changes to the climate beyond those projected in the latest set of UK Climate Projections. Paragraph 4.49 requires any adaptation measures to be based on the latest set of UK Climate Projections, the most recent UK Climate Change Risk Assessment, consultation with statutory consultation bodies and other appropriate climate projection data. Any adaptation measures must themselves also be assessed as part of any Environmental Impact Assessment and included in the ES, which should set out how and where such measures are proposed to be secured.

8.8.3 The requirements of the ANPS on climate change adaptation are largely repeated in the NNNPS in paragraphs 4.36 to 4.47. Paragraph 4.40 recognises that new national networks infrastructure will be typically long-term investments which will need to remain operational over many decades, in the face of a changing climate. Consequently, Applicants are required to consider the impacts of climate change when planning location, design, build and operation.

8.8.4 Paragraph 8 of the NPPF states that in order to achieve sustainable development, there is a need to protect and enhance the natural, built and historic environment including mitigating and adapting to climate change. Section 14 of the NPPF relates to meeting the challenges of climate change in particular with regards to flooding and coastal change. It states that the planning system should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure (paragraph 152). Paragraph 154 states that new development should be planned for in ways that manage climate change risk through suitable adaptation measures and reduce greenhouses gas emissions. Paragraph 155 supports the increased use and supply of renewable and low carbon energy

and heat.

Assessment

8.8.5 **ES Chapter 15: Climate Change** (Doc Ref. 5.1) provides an assessment of the potential effects of current and future climate change on the Project. It should be read alongside **ES Chapter 16: Greenhouse Gases** (Doc Ref. 5.1). In particular, it presents the assessment of the following:

- **Climate Change Resilience (CCR)**: the resilience of the design, construction and operation of the Project to projected future climate change impacts. Decommissioning has been scoped out of this assessment.
- **In-combination Climate Change Impacts (ICCI)**: the combined effects of the Project and its potential climate change impacts on the receiving environment and community.

8.8.6 The UK Climate Change Act 2008 requires GAL to report on how the airport is addressing current and future climate impacts. GAL has developed Climate Change Adaptation Reports (CCAR). The latest report was published in 2021. These existing adaptation reporting processes are relevant to the environmental assessment of the Project as all climate change risk assessment and associated environmental measures identified through the assessment would feed into GAL's future reporting (both construction and operation phases of the Project). The CCAR must be prepared at no longer than five yearly intervals. To date, GAL has prepared three CCARs dated 2011, 2016 and 2021. Paragraph 4.49 of the ANPS requires that adaptation measures proposed in relation to new airport infrastructure are based on the most recent UK CCAR (DEFRA, January 2017)[69].

8.8.7 The issues covered within the assessment which relate to both the construction and operational phases of the Project are detailed in **Table 15.4.1** in **ES Chapter 15.** These are summarised as follows:

Activity	Potential Effects
Construction Period	
Construction and demolition activities within the existing airport boundary and construction of upgraded highway junctions	Extreme weather/climatic events (winds, heatwaves, low temperatures, droughts, intense rainfall events, lightning) exacerbating health and safety of construction workers and impacts on nearby sensitive community receptors (CCR and ICCI assessments).
	Extreme weather/climatic events (winds, heatwaves, low temperatures, droughts, intense rainfall events, lightning) exacerbating environmental impacts to air, land, biodiversity, water, and human health receptors (ICCI assessment).

[69] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/584281/uk-climate-change-risk-assess-2017.pdf

Activity	Potential Effects
Delivery of construction and demolition activities within existing airport boundary, including construction of upgraded highway junctions	Extreme weather/climatic events (winds, heatwaves, low temperatures, droughts, intense rainfall events, lightning) negatively affecting performance of construction equipment/delays to construction programme (CCR assessment).
Operational Period	
Performance of the Project with respect to climate change resilience and adaptation.	Change in seasonal patterns (rainfall and temperatures) affecting soil moisture, flora growing season, green infrastructure (ICCI and CCR assessments).
	Extreme weather/climatic events (winds, heatwaves, low temperatures, droughts, intense rainfall events, lightning) exacerbating environmental impacts to air, land, biodiversity, water, and human health receptors (ICCI assessment).
	Urban Heat Island (ICCI and CCR assessments).
	Change in seasonal patterns (rainfall and temperatures) affecting health and safety (CCR assessment).
	High temperatures, heatwave, high intensity rainfall events, snowfall, lightning and/or flooding affecting aircraft operations, airport infrastructure (eg, drainage), utilities/service resilience and upgraded highway junctions (CCR assessment).
Mitigation areas beyond existing airport boundary	Change in seasonal patterns (rainfall and temperatures) affecting soil moisture, flora growing season, green infrastructure (ICCI assessment).
	Extreme weather/climatic events (winds, heatwaves, low temperatures, droughts, intense rainfall events, lightning) exacerbating environmental impacts to air, land, biodiversity, water, and human health receptors (ICCI assessment).
	Urban Heat Island (ICCI and CCR assessments).

8.8.8 The CCR and ICCI assessment considers five sets of current and projected future climate conditions as follows:

- current baseline climate conditions for 1981-2010– based on historical weather data;
- future climate scenario for 2020-2049 (‘2030s’) covering the construction period;
- future climate scenario for 2050-2079 (‘2060s’) covering operation;
- Probabilistic Projections of Climate Extremes (PPCE) for current baseline (1981-2010) climate extremes; and
- PPCE for future (‘2060s’) climate extremes.

8.8.9 For the purposes of the assessment during the operational period, it has been assumed that GAL will commit to continuing its Gatwick Airside Adverse Weather Plan (2021). Gatwick Airport is an EASA (European Union Aviation Safety Agency) certified Aerodrome. Under EASA regulations Gatwick Airport is required to have an Adverse Weather Plan. This Plan is

prepared to preserve passenger, operational safety and business continuity.

8.8.10 The adaptive capacity of the Project has been considered, based on the resilience inherent in embedded mitigation and the capacity of the Project to be retrofitted to be even more resilient in the future. The embedded and existing mitigation considered as part of the assessment are identified in **Table 15.8.4** and Table 15.9.1 in **ES Chapter 15** and are summarised as follows:

- Climate resilience related design principles (Appendix 1 of the **Design and Access Statement** (Doc Ref. 5.3)) includes consideration of measures for heating and cooling.
- **ES Appendix 5.4.2: Carbon Action Plan** (Doc Ref. 5.3) - The Carbon Action Plan supports, resilience through reducing reliance on, and requiring additional capacity during prolonged warmer/colder seasons and extreme events, on the energy grid; increasing overall energy resilience by requiring low carbon heating, cooling and energy use.
- Climate resilience related design principles (Appendix 1 of the **Design and Access Statement** (Doc Ref. 5.3)) and **ES Appendix 5.3.2: CoCP Annex 1 - Water Management Plan** (Doc Ref. 5.3) - directly support resilience through reducing mains water use and demand.
- Adverse weather measures in the **Code of Construction Practice (CoCP)** (Doc Ref. 5.3) and **CoCP Annex 1 - Water Management Plan (ES Appendix 5.3.2)** (Doc Ref. 5.3)
- Alongside the CoCP measures, the consideration of climate projections and risks by relevant contractors - sets out best practice construction methods including adverse weather measures in construction to ensure that there are plans in place (which include all airside operations areas) about how GAL can sustain stable construction in the event of an adverse weather event including a processes and procedures for different extreme weather events during the construction.
- **Outline Landscape and Ecology Management Plan (oLEMP) (ES Appendix 8.8.1)** (Doc Ref. 5.3) –- this outlines the combined strategies for landscape and ecology and incorporates several mitigation measures. It demonstrates the elements and landscape zones that would be created as part of the Project, in addition to actions for their ongoing maintenance and management.
- **Flood Resilience Statement (ES Appendix 11.9.6** in **Annex 6**) and **Surface Access Highways Surface Water Drainage Strategy** (**ES Appendix 11.9.6** in **Annex 2)** (Doc Ref. 5.3) and Drainage Design Principles (Appendix 1 of the **Design and Access Statement** (Doc Ref. 7.3)) – will ensure that there is no adverse impact on flood risk as a result of the Project.
- Measures contained within the **Code of Construction Practice (CoCP)** (Doc Ref. 5.3) - the CoCP sets out best practice construction methods including those to mitigate potential in-combination climate change impacts from climate change on groundwater receptors and the historic environment.
- Vegetation Retention Plans **(Outline Landscape and Ecology Management Plan (oLEMP) (ES Appendix 8.8.1)** ((Doc Ref. 5.3) and **Code of Construction Practice (CoCP)** (Doc Ref. 5.3) - To ensure green infrastructure assets are retained wherever possible, and their ongoing management is maintained so the impacts on the character of surrounding landscapes and townscapes are minimised.
- Planting woodland, tree, scrub, shrub, wetland, amenity and grassland planting in the **ES Appendix 8.8.1 Outline Landscape and Ecology Management Plan** (Doc. Ref. 5.3) - ensure a high-quality environment is created. These proposals include

consideration of climate change as the plant species chosen would be resilient to all extreme weather conditions and climate change. This includes drought resistant species in the planting options to increase the resilience of plants to future drought conditions. This would also benefit several environmental topics.

- Landscape resilience in the **ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan** (Doc. Ref. 5.3) - to build long-term climate resilient mitigation into the landscape surrounding Gatwick.
- Creation of new high value habitats as set out in **ES Appendix 8.8.1 Outline Landscape and Ecology Management Plan** (Doc. Ref. 5.3) - To provide new habitats for fauna displaced during the diversion of the River Mole, enhancing existing habitats and increasing the resilience of flora subject to increased drought conditions in future.
- The implementation of measures to prevent and control spillage of oil, chemicals and other potentially harmful liquids in existing legislative regimes and in **ES Appendix 5.3.2: Code of Construction Practice** (Doc. Ref. 5.3) - to ensure appropriate storage and handling of materials and products that reduce the impact of accidental spillages and potential impacts from simultaneous flooding events.
- Realignment of the River Mole as per **ES Appendix 8.8.1 Outline Landscape and Ecology Management Plan** (Doc. Ref. 5.3) - Natural plan form to improve flow regime increasing the existing capacity of the river. This mitigation would also increase the resilience of the surrounding area to changing climate and provide additional habitats.
- **Gatwick Airside Operations Adverse Weather Plan**–- this plan, part of the existing legislative regime, supports resilience by setting out processes and procedures for different extreme weather events.

8.8.11 There are other existing actions that are captured within the CCR (risk based) Assessment under embedded mitigation measures that require continuation of and adherence to, under the existing legislative regime, for the Project (see **ES Appendix 15.8.1 Climate Change Resilience Assessment** in **ES Chapter 15)** which are summarised below:

- assets designed based on the latest standards and specifications that take future climate change into account;
- measures relating to allowances in maximum take-off weight, maximum plane operating temperature and take-off in hot days are managed by flight operation procedures; and
- infrastructure assets will be designed to the climatic conditions experienced at the end of their life cycle using appropriate climate change projections and allowances (as advised by regulators).

CCR Assessment

8.8.12 The full CCR assessment for the construction and operational periods is presented in **Appendix 15.8.1 Climate Change Resilience Assessment** in **ES Chapter 15.**

Construction Period (2030s)

8.8.13 No significant effects are expected, and no further mitigation is required.

Operational Period (2060s)

8.8.14 No high or very high risks (considered significant) during operation were identified in the CCR assessment. Therefore, no further mitigation is required. Whilst not considered necessary to avoid significant effects, additional measures may be implemented following scheme refinements during detailed design stage which would further reduce the risk of any

significant effect.

8.8.15 As a responsible operator, and in compliance with the evolving legislative landscape, GAL already has procedures to check the efficacy of embedded mitigation measures and keep them under review on account of regulator change, other circumstances change or the prevailing climate changes; to preserve passenger and operational safety and business continuity. All risks, especially the medium risks (not significant) (see **ES Appendix 15.8.1 CCR Assessment** for more detail) to ensure they do not move to the high or very high rating, need regular review. During operation this can be formalised and aligned with the GAL's Task Force for Climate-Related Disclosures (TCFD) mandatory reporting (latest example in GAL, 2023)[70] and GAL's 5-year review cycle for the Climate Adaptation Risk Assessment (GAL, 2021)[71], reporting to the Government under the ARP as part of the 2008 Climate Change Act. Although currently voluntary, all major airport and infrastructure operators currently report under the ARP and this reporting may become mandatory in the future

ICCI Assessment

8.8.16 The ICCI assessment assesses the extent to which climate change exacerbates a potential effect of the Project on an environmental receptor listed in **Table 4.4.1** in **ES Appendix 15.4.1 Climate Change Resilience Definitions** (Doc Ref. 5.3). The full ICCI assessment is set out in **ES Appendix 15.9.1 In-Combination Climate Change Impacts Assessment** (Doc Ref. 5.3).

8.8.17 Mitigation and enhancement measures identified by other environmental topics and how they influenced the ICCI assessment are presented in **Table 15.9.1** in **ES Chapter 15.**

Construction Period (2030s)

8.8.18 The assessment of these impacts for the construction period is presented in **ES Appendix 15.9.1 In-Combination Climate Impact Assessment** (Doc Ref. 5.3). The ICCI assessment concluded that no significant impacts were identified during the construction period given the mitigation embedded into the Project. No further mitigation is proposed during this construction period of the Project as a result of this ICCI assessment. No future monitoring is proposed during this construction period of the Project on the basis that no significant effects were identified.

Operation Period (2060s)

8.8.19 The assessment of potential in-combination climate change impacts for the operational period is presented in **Appendix 15.9.1** (In-Combination Climate Impact Assessment) in **ES Chapter 15.** The ICCI assessment concluded that there were no significant ICCIs identified during the operation of the Project. No further mitigation is proposed during this operational

[70] Gatwick Airport Limited (Gatwick) (2023) Annual report and the consolidated and parent company financial statements for the year ended 31 December 2022 [Online]. Available at: [redacted]

[71] Gatwick Airport Limited (Gatwick) (2021) Climate Change Adaptation Progress Report - [redacted]

period of the Project on the basis that no new significant effects were identified.

8.8.20 Future monitoring is proposed during this operational period of the Project and is considered good practice. All ICCIs currently identified as not significant need future monitoring by GAL (see **ES Appendix 15.9.1 In-combination Climate Change Impacts Assessment** for more detail) (Doc Ref. 5.3). During operation this can be formalised and aligned with the GAL's Task Force for Climate-Related Disclosures (TCFD) mandatory reporting (latest example in GAL, 2023)[72] and GAL's 5-year review cycle for the Climate Adaptation Risk Assessment (GAL, 2021),[73] reporting to the Government under the ARP as part of the 2008 Climate Change Act. Although currently voluntary, all major airport and infrastructure operators currently report under the ARP and this reporting may become mandatory in the future.

8.8.21 A separate climate change cumulative effects assessment is not required nor is a separate climate change inter-related effects assessment.

8.8.22 With the stated mitigation measures in place, it is concluded that climate change adaptation can be satisfactorily managed and that this matter can be attributed neutral weight in the planning balance.

Planning Policy Compliance

8.8.23 In accordance with paragraphs 4.45 and 4.49 in the ANPS, the **ES** sets out how the proposal will take account of the projected impacts of climate change using the latest UK Climate Projections available and the most recent UK Climate Change Risk Assessment, along with consultation with statutory consultation bodies and other appropriate climate projection data. The EIA assesses the existing and embedded adaptation measures and sets out how and where such measures are proposed to be secured within the **draft DCO** (Doc Ref. 2.1).

8.8.24 The assessment has demonstrated that the embedded and further mitigation that is proposed will minimise the most dangerous impacts of climate change in accordance with paragraph 4.42 of the ANPS and paragraph 4.37 of the NNNPS.

8.8.25 In summary, the proposed development has been planned for in ways that manage climate change risk through suitable adaptation measures and is therefore compliant with the relevant planning policy requirements. The matter should not, therefore, be afforded significant weight in the planning balance.

8.9 Biodiversity and Ecological Conservation

Policy Context

8.9.1 Paragraphs 5.84 to 5.91 of the ANPS refer to the aims of the UK Government's biodiversity strategy to 'halt biodiversity loss, support healthy, well-functioning ecosystems, and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife

[72] Gatwick Airport Limited (Gatwick) (2023) Annual report and the consolidated and parent company financial statements for the year ended 31 December 2022 [Online]. Available at: [redacted]

[73] Gatwick Airport Limited (Gatwick) (2021) Climate Change Adaptation Progress Report - [redacted]

and people.'

8.9.2 The ANPS describes the approach to the incorporation of ecological mitigation measures during the construction and operation of airport developments (paragraphs 5.92 to 5.95 refer).

8.9.3 Paragraph 5.96 of the ANPS requires development to avoid significant harm to biodiversity and geological conservation interests, including through mitigation and the consideration of reasonable alternatives. The ANPS advises the consideration of biodiversity offsetting in devising compensation proposals to counteract any impacts on biodiversity which cannot be avoided or mitigated. Where significant harm cannot be avoided or mitigated, as a last resort appropriate compensation measures should be sought. Similar considerations are also set out at paragraphs 5.25 of the NNNPS.

8.9.4 Paragraph 5.97 of the ANPS states that appropriate weight should be attached to designated sites of international, national and local importance, protected species, habitats and other species of principal importance for the conservation of biodiversity, and to biodiversity and geological interests within the wider environment.

8.9.5 The ANPS requires proposals to mitigate the harmful aspects of development on Sites of Special Scientific Interest (SSSI) and, where possible, to ensure the conservation and enhancement of a SSSI's biodiversity or geological interest, are acceptable. Requirements and / or planning obligations will be used to ensure these proposals are delivered (paragraph 5.101).

8.9.6 Paragraph 5.102 of the ANPS concerns the role of sites of regional and local biodiversity interest (which include Local Nature Reserves, Local Wildlife Sites and Nature Improvement Areas). The policy requires consideration of adequate compensation, including maintaining ecological corridors as a priority to mitigate widespread impacts.

8.9.7 Paragraph 5.103 of the ANPS confirms that ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Development that would result in the loss or deterioration of irreplaceable habitats including ancient woodland will not be permitted unless the national need for and benefits of the development, in that location, clearly outweigh the loss.

8.9.8 The ANPS states development proposals are required to maximise opportunities for building in beneficial biodiversity as part of good design, including establishing and enhancing green infrastructure (paragraph 5.104).

8.9.9 Paragraph 5.105 confirms that measures should be taken to ensure that habitats and species that are subject to statutory protection or international, regional or local designation are protected from the adverse effects of development. The NPS states that this should be controlled, where appropriate, through requirements or planning obligations.

8.9.10 NNNPS paragraph 5.35 states appropriate mitigation measures should be included as an integral part of a proposed development, including identifying where and how these will be secured.

8.9.11 The requirements in the NNNPS insofar as they relate to the assessment of biodiversity and ecological conservation (paragraphs 5.20 to 5.38) are largely as set out in the ANPS.

8.9.12 Chapter 15 of the NPPF sets out the Government's planning policies for 'Conserving and

enhancing the natural environment' including a requirement to consider biodiversity in planning decisions (paragraph 174).

8.9.13 The NPPF requires planning decisions to be determined in accordance with the principles set out at paragraph 180 including the consideration of significant harm to biodiversity arising from development to be avoided, mitigated or compensated for.

8.9.14 Paragraph 182 of the NPPF requires that '*the presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.*'

Assessment

8.9.15 **ES Chapter 9: Ecology and Nature Conservation** (Doc Ref. 5.1) provides an assessment of the Project on ecology and nature conservation interests of the Project site and surrounding receptors.

8.9.16 The effects of the Project on air quality, water environment and traffic and transport have an effect on ecology and biodiversity and are assessed in other chapters of the **ES** notably **Chapter 11: Water Environment, Chapter 12: Traffic and Transport** and **Chapter 13: Air Quality** (Doc Ref. 5.1).

8.9.17 In accordance with the ANPS and NNNPS the potential environmental effects on ecology and nature conservation arising from the Project have been considered based upon information gathered and the analysis and assessments undertaken within various studies.

8.9.18 **ES Appendix 9.6.1 Ecological Desk Study** (Doc Ref. 5.3) summaries the adopted methodologies for the assessment. An **Ecology Survey Report** (**ES Appendix 9.6.2**) (Doc Ref. 5.3) provides details of surveys undertaken between 2018 and 2022 for habitats, hedgerows, badgers, bats, birds dormouse, newts, reptiles, water vole and otters, fish. **ES Appendix 9.6.3** (Doc Ref. 5.3) details the approach and findings relating to **Bat Trapping and Radio Tracking Surveys**, focusing on parts of the Project site that may be of importance to bats. A **Badger Survey** was also undertaken (**ES Appendix 9.6.4** refers, provided on a confidential basis) (Doc Ref. 5.3). A **Habitats Regulations Assessment Report** has also been undertaken (**ES Appendix 9.9.1)** Doc Ref. 5.3).

8.9.19 The assessment for ecology and nature conservation provided within the **ES** highlights any necessary monitoring and/or mitigation measures that could prevent, minimise, reduce or offset the potential environmental effects, including residual effects, identified through the environmental impact assessment process.

8.9.20 **Table 9.4.1** in **ES Chapter 9** summarises the potential effects of the Project on ecology and biodiversity which have been considered based on the construction period (including demolition) and the operational period for the Project. These potential effects are summarised in the table below.

Activity	Potential Effects
Construction Period (including Demolition)	
Construction and demolition activities	Effects on designated sites and habitats as a result of construction activity including habitat severance and loss of ecological connectivity, habitat disturbance (e.g. light, noise pollution/ introduction of toxic pollutants), changes to water quality/flow and changes in air quality (emissions from traffic and dust). Effects on species valued as important features of designated sites.
	Effects on habitats as a result of construction activity eg habitat loss, habitat severance and loss of ecological connectivity, habitat disturbance (eg dust, light, noise pollution/introduction of toxic pollutants), through changes to air and water quality/flow.
	Effects on species as a result of construction activity within the Project boundary (e.g. direct killing or injuring of fauna, disturbance and displacement of species (particularly to those sensitive to noise and light disturbance), introduction or spread of invasive species, changes to water quality).
Construction of highways improvements	Effects on habitats as a result of construction of upgraded highway junctions (e.g. habitat loss, habitat severance and loss of ecological connectivity, habitat disturbance (e.g. dust, light, noise pollution/introduction of toxic pollutants), changes to air and water quality/flow).
	Effects on species as a result of construction of upgraded highway junctions (e.g. direct killing/injury through activity/pollution, disturbance by increased noise/light, loss of foraging/commuting habitat).
Use of construction compounds and creation of mitigation areas	Effects on habitats, including ancient woodland, as a result of use of construction compounds and creation of mitigation areas beyond the airport boundary (e.g. habitat loss, habitat severance and loss of ecological connectivity, habitat disturbance (e.g. dust, light, noise pollution/ introduction of toxic pollutants), introduction or spread of invasive species (in particular along the water courses within the airport and surrounding land), changes to air/water quality/flow).
	Effects on species as a result of use of construction compounds and creation of mitigation areas beyond the airport boundary (eg direct killing or injuring of fauna, disturbance and displacement of species (particularly to those sensitive to noise and light disturbance), introduction or spread of invasive species).
Operational Period	
Use of airport, including upgraded	Effects on designated sites (set out above) as a result of changes to air quality both from airport operations and traffic emissions.
	Effects on habitats as a result of operational activity, including light and noise, as well as from changes to air quality both from airport operations and traffic emissions (air traffic movements and surface access) (eg habitat loss,

highway junctions	habitat severance and loss of ecological connectivity, habitat disturbance (eg dust, light, noise pollution/introduction of toxic pollutants)).
	Effects on species as a result of operational activity (including light and noise) (eg direct killing or injuring of fauna (including bird/bat strike from increased air traffic movements and road traffic collisions), disturbance and displacement of species (particularly to those sensitive to noise and light disturbance), introduction or spread of invasive species).

8.9.21 **Table 9.6.5 in the ES** provides a summary of Important Ecological Features. The majority of the Project site comprises habitats associated with the airport including areas of tarmacked hard standing and an array of buildings associated with the wider airport. Areas of grassland on the airfield are managed making them unattractive to wildlife. Undeveloped areas around the periphery of the airport include broadleaved woodland and neutral grasslands.

8.9.22 The Project site includes two areas managed by GAL as part of the airport Biodiversity Action Plan (BAP) including:

- the North West Zone (NWZ) made up of the corridor of the River Mole comprising the watercourse, neutral grasslands and broadleaved woodland; and
- the Land East of the Railway Line (LERL) made up of broadleaved woodland, neutral grassland (including a flood storage area) and the Gatwick Stream.

8.9.23 There are no statutory designated sites within the Project site boundary, with the nearest being at Willoughby Fields Local Nature Reserve (LNR) located approximately 786 metres to the south. There are 14 nationally designated sites within 5 km of the Project site boundary. A further 71 non-statutory designated sites have been identified within 5 km of the Project site boundary. Horleyland Wood Local Wildlife Site (LWS), comprised of woodland, is located adjacent to the Project site boundary.

8.9.24 Gratton's Park Biodiversity Opportunity Area (BOA) and the River Mole (and tributaries) BOA fall within the Project boundary and Gatwick Woods BOA is located partially within the Project boundary to the east of the airport.

8.9.25 There are three internationally designated sites within 20 km of the Project site boundary including; Mole Gap to Reigate Escarpment SAC (located 9.27 km to the north west of the Project site boundary), Ashdown Forest SAC (located 12 km to the south west of the Project site boundary), and Ashdown Forest SPA (located 12 km to the south west of the Project site boundary). In addition, Ebernoe Common SAC (located 29 km to the south west of the site) and The Mens SAC (located 25 km to the south west of the site) are important European designated sites for bats.

8.9.26 The surveys undertaken to inform the assessment of potential effects of the Project on ecology and nature conservation identify the presence of a range of species including two plant protected plant species within the Project boundary (Bluebell *Hyacinthoides non-scripta* and pennyroyal *Mentha pulegium*). A total of 72 bird species were recorded within the Project site boundary and surrounding study area, with a breeding assemblage of 51 species. Grass snakes were recorded within and immediately adjacent to the Project site in two distinct areas, along the River Mole corridor (NWZ) and within the grassland areas of the LERL. A number of ponds and linear water features are identified as being suitable to

support all species of native amphibian. Signs of badger activity were also recorded.

8.9.27 An assessment of the suitability of buildings for bat roosting potential, within the landside and airside areas of the Project site, and a total of 43 trees within the Project site are identified as having features suitable to support roosting bats. Higher value foraging and commuting habitat was identified within the woodland areas in the east of the Project site, along woodland edges, river corridors and mature hedgerows and treelines.

8.9.28 The Project site boundary also includes a number of Habitats of Principal Importance including hedgerows, woodland, rivers and ponds. A number of Species of Principal Importance were also found to be present during field surveys (common toad) and from the desk study. Records of harvest mouse and hedgehog are also considered.

8.9.29 **Table 9.7.1** in **ES Chapter 9** summarises the potential impacts of the Project based on the construction period, first operation of the dual runways and up to construction of the final elements of the Project.

8.9.30 The Project site encompasses an area of approximately 735 hectares. The majority of this area comprises existing operational airport and configuration of habitats would remain largely unchanged. Individual elements of the Project which would affect habitat loss are identified within **ES Project Description Figures 5.2.1a** to **5.2.1h** (Doc Ref. 5.2). **Table 9.7.1** in **ES Chapter 9** confirms the Maximum Design Scenarios that have been identified which have the potential to result in the greatest effect on an identified receptor or receptor group.

8.9.31 A number of measures have been incorporated into the Project to reduce the potential for impacts on ecology and nature conservation. These are summarised in **Table 9.8.1** in **ES Chapter 9.** In summary, extensive mitigation and enhancement measures are proposed including:

- Assessing all pre-construction archaeology, ground investigation and unexploded ordnance surveys for potential impacts on ecology and nature conservation
- Avoidance of designated sites, areas of woodland and other ecological sensitive habitats
- 15 metres buffer zones around areas of ancient woodland including use of dust suppression methods
- Protection during construction of existing trees, scrub and hedgerows to be retained
- Review existing features of ecological value at detailed design stage to see if they can be incorporated within the design
- Measures for the appropriate storage of materials and fuel and management of dust during construction activities (to be managed through the CoCP
- A lighting strategy to ensure levels of artificial lighting do not significantly increase on sensitive habitats
- Clearing woodland sensitively so that bluebell bulbs could be collected and replanted within new woodland
- Suitable habitat for breeding birds would be cleared between October and mid-February, outside the breeding bird season
- Additional breeding bird surveys would be undertaken prior to construction commencing to determine the presence or absence of Schedule 1 species
- Any nest of a Schedule 1 species found to be active during construction works would be protected by a suitably sized buffer

- At least part of the mitigation area in the west of the site would be managed to provide a suitable nesting site for skylark
- Receptor areas for GCN and grass snake would be prepared, and the species translocated into these areas
- Areas of lower value reptile habitat would be cleared sensitively
- Active badger setts that would be damaged or destroyed, or which could result in badgers using them being disturbed, would be closed using appropriate methods
- Measure to ensure that no badgers are harmed during the construction phase
- Creation of new, high value habitats comprising a mixture of wet and dry neutral grasslands along the new channel of the River Mole and within the Museum Field
- Creation of an earth bund in the south and east of Museum Field to provide a mosaic of habitats
- Creation of new habitats within a newly created mitigation area in the western part of the Project site
- Tree and shrub planting to compensate for loss of existing habitat within built-up areas
- Woodland creation to compensate for loss of existing habitat
- Restoration of temporary land take to habitats of existing or greater ecological value
- The retention of a strip of woodland between the Gatwick Stream and new highway alignments/water attenuation area to retain a dark corridor
- Creation of new habitats within a newly created mitigation area north and east of Longbridge roundabout
- Creation of woodland belts in Pentagon Field
- Replacement of the hedgerow between the A23 London Road and Perimeter Road East with a native species-rich hedgerow
- Provision of bat roost features within higher value habitats
- Landscape planting to include a variety of native trees and shrubs and wildflower grasslands.
- Tree and shrub planting to reinforce retained tree lines within existing car parks and to improve habitat connectivity across them
- Creation of an attenuation pond supporting reedbed to the north of South Terminal Roundabout
- Creation of various small attenuation ponds and drainage ditches as part of highway proposals supporting wet grassland and marginal plants
- Diversion of the River Mole would create an increased length of channel with a more sinuous, natural course

8.9.32 Creation of refugia and hibernacula within newly created habitats for GCN and grass snake.The assessed significance of effects of the Project upon ecology and nature conservation range from moderate adverse effects (long-term loss of woodland and associated effects on species that use that woodland) to moderate beneficial effects (diversion of River Mole). In the long term (i.e. by the future assessment year, 2047), the moderate adverse effects on woodland would have reduced to minor adverse and no longer be significant. The moderate adverse effects on the species that use the woodland would be negligible.

8.9.33 A range of pre-construction surveys would be undertaken, including for ecology (birds, reptiles and other species) and for other disciplines. These would include intrusive surveys such as ground investigation excavations. The measures designed into the Project would ensure that high value habitats would be avoided as far as practicable and that any localised

impacts on habitats for protected species would be avoided. The effects would be controlled through the **CoCP** (Doc Ref. 5.3).

8.9.34 The overall loss of semi-natural broadleaved woodland and broadleaved trees within the Project boundary and the resulting loss of habitat connectivity is considered to be a long term, reversible and medium magnitude impact resulting in a moderate adverse significance of effect which is considered to be significant. As the mitigation planting matures, by the long-term assessment year in 2047, this effect would become a low adverse and therefore not significant.

8.9.35 New and translocated habitats and species are expected to establish within the proposed new channel forming part of the diverted River Mole. Habitats adjoining the new river corridor would also be restored to wet grassland from 2035 when the airfield satellite contractor compound is anticipated to be decommissioned. This would result in a longer length of stream and associated habitats, designed to be of higher value than the section of river lost. This would result in a moderate beneficial effect.

8.9.36 Mitigation measures incorporated into the Project would ensure that areas of suitable foraging and nesting habitat were replaced across the Project site and birds displaced from areas of construction would be likely to move to similar areas of suitable habitat within and adjacent to the Project site boundary. This would not result in the complete loss of breeding sites and substantial areas of habitat would be retained within the Project site and within the vicinity. The loss would result in a long-term, medium impact on other breeding birds (a feature of County value) due to the amount of time habitats would be absent, resulting in a moderate adverse significance and therefore considered significant. As the mitigation planting matures, by the long-term assessment year in 2047, this effect would become negligible and therefore not significant.

8.9.37 The construction works assumed to be undertaken between 2024 and 2029 would result in the loss of a range of habitats suitable for foraging, commuting and roosting bats across the Project site. When considered with the other aspects of the Project the overall impact would be long-term and high, resulting in a moderate adverse significance of effect and therefore significant. As the mitigation planting matures, by the operational year, 2038, this effect would become negligible and therefore not significant.

8.9.38 The provision of new areas of habitat creation ensures that, overall, the Project delivers substantial biodiversity net gain (BNG) of circa 20%.

8.9.39 In addition to which a range of monitoring relating to GCN and grass snake populations, bat activity, badger setts and river condition assessment will be undertaken.

Planning Policy Compliance

8.9.40 The Project site largely comprises low value habitats associated with the airport and its infrastructure. The site consists of large areas of hard standing and amenity grassland with areas of ornamental shrub and tree planting. These areas are predominantly located within the centre of the Project site with areas of higher value habitats to the east and west.

8.9.41 Where possible, the Project has been designed to avoid or reduce adverse effects on valued ecological features and deliver benefits for biodiversity in accordance with policy and best practice. Where potential adverse effects are identified, measures have been incorporated to

mitigate any effects. This is in line with paragraph 5.91 and 5.96 of the ANPS which states *"development should avoid significant harm to biodiversity and geological conservation interests, including through mitigation and consideration of reasonable alternatives."*

8.9.42 An assessment of the effects has been conducted in compliance with the requirements of ANPS (including paragraph 5.96) and NNNPS (paragraph 5.25). The Project has taken into account the need to protect biodiversity and prevent significant harm, such as through avoiding areas of high biodiversity value. This has included changes to the Project boundary to avoid areas of high biodiversity value.

8.9.43 Mitigation measures adopted as part of the Project include measures to protect and minimise the potential for effects on biodiversity including habitat creation around the Project site, which would contribute to the overall effect in relation to biodiversity. Details of compensation measures are provided where they are required as a last resort, such as the provision of alternative habitat to compensate for habitat losses for bats, great crested newts and reptiles.

8.9.44 The Project would have no direct effect on SSSIs. The Project would have no direct effect on Local Nature Reserves or Local Wildlife Sites due to the mitigation measures that would be put in place. The Project therefore complies with the requirements of ANPS paragraph 5.101 and paragraph 2.29 of the NNNPS.

8.9.45 Opportunities to enhance the Project site for the benefit of biodiversity have been included in the design of the Project consistent with the requirements set out in the ANPS (paragraph 5.104) and NNNPS (paragraph 5.33). Furthermore, a range of appropriate mitigation measures are integral to the Project that reduce the potential effects of the Project upon biodiversity.

8.9.46 Paragraph 174 of the NPPF requires decisions to minimise impacts on and provide net gains for biodiversity. The Project accords with the trust of this requirement by a range of measures designed to enhance biodiversity and nature conservation. The Project delivers a biodiversity net gain of over 20% (as set out in **ES Appendix 9.9.2 Biodiversity Net Gain Statement** (Doc Ref. 5.3).

8.9.47 The NRP has been assessed as being in accordance with relevant policies for ecology and nature conservation including biodiversity. Whilst some of the measures, including proposed mitigation, will take time to establish, these can be afforded positive weight in the planning balance.

8.10 Agricultural Land Use and Recreation

Policy Context

8.10.1 Paragraph 5.108 of the ANPS explains that best and most versatile agricultural land is land which is most flexible, productive, and efficient in response to inputs, and which can best deliver future crops for food and non-food uses.

8.10.2 Paragraphs 5.115 and 5.126 of the ANPS set out policy regarding development on the best and most versatile agricultural land. Paragraph 5.115 states that the Applicant should take into account the economic and other benefits of best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, the

Applicant should seek to use areas of poorer quality land in preference to that of a higher quality. Paragraph 5.126 notes that the SoS will take into account the economic and other benefits of the best and most versatile agricultural land, and ensure the applicant has put forward appropriate mitigation measures to minimise impacts on soils or soil resources.

8.10.3 Paragraphs 5.109, 5.118, 5.122 and 5.126 of the ANPS sets out policy on soil resources and their protection. Paragraph 5.109 explains that development of land will affect soil resources, including physical loss of and damage to soil resources, through land contamination and structural damage. Indirect impacts may also arise from changes in the local water regime, organic matter content, soil biodiversity and soil process. Paragraphs 5.118 states that the Applicant can minimise the direct effects of a project on the existing use of the proposed site, or proposed uses near the site, by the application of good design principles, including the layout of the project and the protection of soils during construction. Paragraph 5.126 states that the SoS will ensure that the Applicant has put forward appropriate mitigation measures to minimise impacts on soils or soil resources.

8.10.4 Paragraphs 5.106, 5.112, 5.119, 5.120 and 5.124 of the ANPS relate to the need to protect existing open space, sports and recreational buildings. Paragraph 5.106 states that access to high quality open spaces and the countryside and opportunities for sport and recreation can be a means of providing necessary mitigation and/or compensation requirements and that green infrastructure can enable developments to provide positive environmental and economic benefits. Paragraph 5.112 states that existing open space, sports and recreational buildings and land should not be developed unless the land is no longer needed or the loss would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location. Paragraph 5.119 states that where green infrastructure is affected, the Applicant should aim to ensure the functionality and connectivity of the green infrastructure network is maintained and any necessary works are undertaken, where possible, to mitigate any adverse impact and, where appropriate, to improve that network and other areas of open space, including appropriate access to National Trails and other public rights of way. Paragraph 5.120 states that the SoS must also consider whether mitigation of any adverse effects on green infrastructure or open space is adequately provided for by means of requirements, planning obligations, or any other means, for example to provide exchange land and provide for appropriate management and maintenance agreements. Any exchange land should be at least as good in terms of size, usefulness, attractiveness, quality and accessibility.

8.10.5 Paragraph 5.124 states that the SoS should not grant consent for development on existing open space, sports and recreational buildings and land, including playing fields, unless an assessment has been undertaken either by the local authority or independently, which has shown the open space or the buildings and land to be no longer needed, or the SoS determines that the benefits of the project (including need) outweigh the potential loss of such facilities, taking into account any positive proposals made by the applicant to provide new, improved or compensatory land or facilities.

8.10.6 Paragraphs 5.119 and 5.123 of the ANPS relate to public access to land. Paragraph 5.119 states the Applicant should aim to improve appropriate access to National Trails and other public rights of way. Paragraph 5.123 explains that public rights of way, National Trails and other rights of access to land are important recreational facilities for walkers, cyclists and

equestrians. It goes on to state that the Applicant is expected to take appropriate mitigation measures to address adverse effects on National Trails, other public rights of way and open access land and, where appropriate, to consider what opportunities there may be to improve access. In considering revisions to an existing right of way, consideration needs to be given to the use, character, attractiveness and convenience of the right of way. The SoS should consider whether the mitigation measures put forward by an Applicant are acceptable and whether requirements or other provisions in respect of these measures might be attached to any grant of development consent.

8.10.7 The requirements in the NNNPS insofar as it relates to the assessment of land use including open space and green infrastructure (paragraphs 5.162 to 5.185) are largely as set out in the ANPS.

8.10.8 Paragraphs 84, 99, 100 and 174 of the NPPF are relevant in the consideration of development effects on the best and most versatile agricultural land, open spaces and the Public Rights of Way network. Paragraph 84 states that planning decisions should enable the development and diversification of agricultural and other land-based rural businesses. Paragraph 99 states that existing open space, sports and recreational buildings and land should not be built on unless certain criteria are met. Paragraph 100 states that planning decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails. Paragraph 174(b) states that planning decisions should conserve the natural environment by contributing and enhancing it through recognising the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.

Assessment

8.10.9 **ES Chapter 19: Agricultural Land Use and Recreation** (Doc Ref. 5.1) provides an assessment of the Project on agricultural land use (agricultural land quality, soils and farm holdings) and recreational resources including areas of public open space, public rights of way and other linear recreational routes (walking, cycling and horse riding routes).

8.10.10 The effects of the NRP that may affect the visual and acoustic amenity of recreational resources are assessed in other chapters of the **ES** notably **Chapter 8: Landscape, Townscape and Visual Resources and Chapter 14: Noise and Vibration**, where appropriate. Socio-economic effects are considered within **Chapter 17: Socio-economics** (all Doc Ref. 5.1).

8.10.11 **Table 19.7.1** in **ES Chapter 19** summarises the maximum design scenarios relevant to the assessment based on the initial construction period (2024-2029), first operations of the dual runways (2030-2032), construction of the final elements (2033-2038), the design year (2038) and the long-term forecast year (2047).

8.10.12 During the initial construction phase, 21.1 hectares of the total 735 hectare project site of farm holdings will be required on a permanent basis (see **ES Agricultural Land Use and Recreation Figure 19.6.3)** (Doc Ref. 5.2). There would be a temporary loss of approximately 12.1 hectares of lower quality Subgrade 3b land associated with the start of construction of the South Terminal roundabout improvements that would affect land to the north of the existing South Terminal roundabout, together with the placement of spoil

material on Pentagon Field. It is assumed that the permanent loss of soils and agricultural land quality would take place during this period and that there would be permanent land take of approximately 10.1 hectares. The permanent loss of agricultural land quality would be primarily associated with the ground lowering (to create a flood compensation area) within Museum Field, land required for the South Terminal roundabout and Longbridge Roundabout improvements (and associated drainage works).

8.10.13 In terms of recreation and impacts on public rights of way and the National Cycle Route 21 (NCR 21), the early construction period (2024-2029) of the highway works associated with the M23 Spur and South Terminal roundabout works would require the temporary diversion for a number of PRoWs. The locations of these diversions are shown on **Figure 19.9.1 (a-e)** in **ES Chapter 19** (Doc Ref. 5.2)**.** The widening of Airport Way over the railway and widening of the embankment on the south side of Airport Way would requirement temporary closure of NCR 21 through the underpass between Riverside Garden Park to the north and Gatwick Airport to the south during these works. The duration of these works would be for approximately 12 weeks. It is proposed that a diversion of NCR 21 would be provided during the temporary closure of the route and the indicative diversion route is shown on **Figure 19.9.1a** in the **ES**. From south to north, the diversion would run from the junction with the Sussex Border Path (West Sussex section 355_1Sy) to the south of Airport Way and head north along the route of the Sussex Border path (Surrey section 355a) to the pedestrian bridge over the railway. From here, cyclists would head west towards The Crescent and then proceed north-west along The Crescent (approximately 75m) to re-join NCR 21 close to the entrance to Riverside Garden Park. The proposed diversion identified in the **Public Rights of Way Management Strategy** (**ES Appendix 19.8.2)** (Doc Ref. 5.3) would increase the length of the route by between 250 and 500m for a period of approximately 12 weeks.

8.10.14 **Figures 19.9.1(b, c and d)** in **ES Chapter 19** show where other footpaths will need to be closed or diverted during the construction period. This includes the temporary closure and diversion of the Sussex Border Path (Surrey section) where the diversion route will require users to walk an additional distance of more than 500m. The works associated with the provision of the A23 Northbound third lane and London Road bridge replacement would include the permanent diversion of the West Sussex Border Path (section 346_2Sy) to the north of Car Park Y, although the diverted route would remain close to its current alignment, as shown on **Figure 19.9.2a** in **ES Chapter 9.**

8.10.15 The Project also includes the provision of an additional shared pedestrian and cyclist ramp within Riverside Garden Park from the A23 footway near to the Longbridge Roundabout which would provide an alternative link to the Sussex Border Path from the residential areas of Horley, which would be to the benefit of the local and wider community.

8.10.16 It is also proposed to implement public access improvements during this period for the benefit of local communities for health and well-being within the NRP site boundary through the provision of a new circular recreational route around the flood compensation area to the east of Museum Field, with a link to the existing alignment of the Sussex Border Path. The location of this route is shown as part of the design concept provided in the **Outline Landscape and Ecology Management Plan (ES Appendix 8.8.1)** (Doc Ref. 5.3).

8.10.17 In terms of public open space, the works on the north side of the A23 London Road would affect the southern fringe of Riverside Garden Park. Within the areas of Riverside Garden

Park, approximately 0.48 hectares of land would be temporarily affected during construction and 1.03 hectares of open space permanently affected by the Project. To mitigate for these impacts the following measures have been incorporated into the NRP design.

- New areas of public open space would be created totalling approximately 1.43 hectares with the current areas of Car Park B to the north and south of the A23. These areas would comprise approximately 120% of the area of land permanently lost within Riverside Garden Park.
- Provision of a shared pedestrian and cycle ramp from the northern side of the A23 located to the south of the River Mole crossing point into Riverside Garden Park.
- Provision of an additional pedestrian route linking Riverside Garden Park to Car Park B and to the Sussex Border Path (Surrey section 355a) located to the west of the railway line north of the A23.

8.10.18 The location of the replacement open space is shown on **ES Figure 19.8.1** (Doc Ref. 5.2) and a concept design for the provision of landscaping and access through these areas is provided in **ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan** (Doc Ref. 5.3).

8.10.19 Works to the Longbridge Roundabout are anticipated to commence in 2029. These may impact an approximate area of 0.36 hectares on the southern part of areas of public open space at Church Meadows (St Bartholomew's Church and the former Horley Anderson Centre and Playing Fields) to the north of the A23 and east of the River Mole, where a highways attenuation feature is to be constructed. The works to the roundabout would permanently impact an approximate area of 0.13 hectares on the southern part of the open space at Church Meadows. To mitigate for these permanent impacts a replacement area of open space would be provided immediately to the west of the River Mole, linked to the existing Church Meadows by a new pedestrian bridge over the River Mole, with a further access provided in the south western corner of the area, accessed from the shared use pedestrian and cycle route that has recently been constructed in this location. This would provide an area of approximately 0.52 hectares of new open space, significantly larger (400%) than the 0.13 hectares area permanently affected within Church Meadows. The area for the replacement open space currently comprises grassland, as does the existing area of Church Meadows, although the replacement land is currently used to support a livestock-based farming enterprise. The grassland use of the replacement land would enable the early establishment of a usable and attractive space, similar to the existing area of Church Meadows. The location of this replacement open space is shown on **ES Figure 19.8.1** (Doc Ref. 5.2) and the draft concept design proposals for this area are included in **ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan** (Doc Ref. 5.3).

8.10.20 During 2030 and 2032, the assessment of effects for the temporary and permanent loss of agricultural land and farm holdings would be the same as for the initial construction period from 2024-2029. The assessment takes a precautionary approach and considers that there could still be potential for continued disruption to the public rights of way network and NCR 21 during this period in the same way as between 2024 and 2029. In terms of public open space during this period, the temporary construction effects on Riverside Garden Park and Church Meadows would be as assessed for 2029. The permanent the loss of 0.13 ha of land in Church Meadows would not adversely affect the integrity of this resource and would be

mitigated by the provision of approximately 0.52 hectares of replacement open space, which would be significantly larger (400%) than the area of Church Meadows permanently lost. The site is well-suited for use as replacement open space and the implementation of planting proposals in accordance with the principles set out in **ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan** (Doc Ref. 5.3) would further enhance the quality of the replacement open space as the landscaping develops. This area of replacement open space is assessed to provide a significant increase in accessible open space available in this location, of a similar quality to that currently found in Church Meadows.

8.10.21 During the period 2033 and 2038, it is anticipated that the temporary areas of agricultural land required in connection with the provision of the new grade-separated junctions as part of the highway improvement works would be restored (as the works on the South Terminal roundabout improvements together with the North Terminal roundabout improvements and Longbridge Roundabout improvements are completed). The implementation of best practice techniques, provided in **ES Appendix 5.3.2: CoCP Annex 4 – Soil Management Strategy** (Doc Ref. 5.3) would enable these temporary areas to be restored to their former agricultural use as part of holdings 1, 3 and 4a. Therefore, there would be **no change** (compared to the baseline situation) in either the agricultural land quality or farming potential of these restored areas following completion of the restoration period. It is anticipated that the South and North Terminal junction improvements and the works to the Longbridge Roundabout would all be completed by 2032 and therefore there would be no further effects on recreational resources arising from the construction works during this period. In terms of open space, there would be no additional effects on open space at Church Meadows arising from the construction works at Longbridge Roundabout during this period as the replacement open space to the west of Church Meadow would be accessible on the completion of the construction works. The permanent effects on Riverside Garden Park, following the reintegration of temporary land into Riverside Garden Park and the implementation of the mitigation measures are anticipated to result in a neglible adverse effect.

8.10.22 No further effects on agricultural land use resources or recreational resources are anticipated as a result of the operation of the Project in the Design Year 2038 or Long Term Forecast Year 2047.

Planning Policy Compliance

8.10.23 The Project does not require the significant development of agricultural land and in any event, all the land to be lost permanently will be lower quality Subgrade 3b land. No best and most versatile land resource (Grades 1, 2 or 3a land) is affected. This is in accordance with paragraph 5.115 of the ANPS. Further in compliance with paragraphs 5.118 and 5.126 of the ANPS, mitigation measures have been proposed to minimise impacts on soil or soil resources in the form of a **Soil Management Strategy (ES Appendix 5.3.2)** (Doc Ref. 5.3) which will ensure the conservation of soil resources; avoidance of damage to soil structures; maintenance of soil drainage; and the reinstatement, where required, of soil profiles as near as possible to their former condition.

8.10.24 The Project will result in the following temporary and permanent loss of open space (Table 8.2):

Table 8.2: Temporary and Permanent Loss of Open Space

Area of Open Space Affected	Temporary Requirement	Permanent Loss
Riverside Garden Park	0.48ha	1.03ha
Church Meadow	0.36ha	0.13ha
Total	**0.84ha**	**1.16ha**

8.10.25 However, the following replacement areas will be provided (Table 8.3):

Table 8.3: Proposed Replacement Open Space Provision

Area of Open Space	Replacement Provision
Riverside Garden Park	
Car Park B North	0.79ha
Car Park B South	0.64ha
Church Meadows	0.52ha
Total	**1.95ha**

8.10.26 In accordance with paragraph 5.112 of the ANPS, this permanent loss of 1.16 hectares of public open space would be replaced by significantly more (1.95 hectares). This provides an increase of approximately 0.79 hectares (68%) of open space available to local communities. The proposed locations of the areas of replacement open space are the closest available parcels of land to those areas that would be permanently lost. The proposed replacement open space considers access and connectivity with the existing areas of open space with pedestrian connections and NCR21.

8.10.27 The replacement open space at Car Park B would provide large areas of accessible open space providing enhanced access to the Sussex Border Path and would include areas of woodland planting, similar to the nature of the wooded southern edge of Riverside Garden Park that would be permanently lost, as well as additional elements that reflect the nature and quality of the wider area of Riverside Garden Park including scrub and ground cover planting and open grassed areas for recreational use. As the landscaping develops over time, this would provide areas of open space that would be similar in nature to the central areas of Riverside Garden Park and more accessible and usable than much of the area lost, the majority of which falls within the highways boundary and contains highways ditches and wooded embankments together with an isolated piece of land that can only be accessed via a steep bank from the A23 Brighton Road.

8.10.28 The replacement open space at Church Meadows is currently used to support a livestock-based farming enterprise. The current grassland use of the replacement land would enable the early establishment of a usable and attractive space, similar to the existing area of Church Meadows.

8.10.29 The replacement open space will therefore represent a quality similar to that of the land lost. The implementation of planting proposals in accordance with the principles set out in the **ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan** (Doc Ref. 5.3) would further enhance the quality of the replacement open space as the landscaping develops.

8.10.30 The replacement open space will therefore represent a quality similar to that of the land lost.

The implementation of planting proposals in accordance with the principles set out in the **ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan** (Doc Ref. 5.3) would further enhance the quality of the replacement open space as the landscaping develops.

8.10.31 Further in compliance with paragraph 5.119 of the ANPS, where green infrastructure will be affected, mitigation has been incorporated into the scheme design to improve areas of open space, including appropriate access to National Trails and other public rights of way.

8.10.32 In accordance with paragraphs 5.119 and 5.123 of the ANPS, access improvements are proposed to National Trails and other public rights of way. Appropriate mitigation measures are proposed to address the potential for disruption to access along the National Cycle Route 21, Sussex Border Path and other public footpaths including permanent or temporary diversions. Additional pedestrian and cyclist recreational facilities are proposed which would be beneficial to the local and wider community.

8.10.33 The Project has been designed, and mitigation measures have been proposed to reduce any impacts on agricultural land use and recreational land in accordance with relevant planning policies. Therefore, the weight that can be attributed in the planning balance is neglible.

8.11 Resource and Waste Management

Policy Context

8.11.1 Paragraph 5.135 of the ANPS states that it is Government policy to protect human health and the environment by producing less waste and by using it as a resource wherever possible. Where this is not possible, waste management regulation ensures that waste is disposed of in a way that is least damaging to the environment and to human health. Paragraph 5.136 explains the waste hierarchy for sustainable waste management which is:

- Waste prevention;
- Preparing for reuse;
- Recycling;
- Other recovery, including energy recovery; and
- Disposal.

8.11.2 Paragraph 5.137 of the ANPS sets out that the targets for preparagraphtion for re-use and recycling of municipal waste (50%), and for construction and demolition waste (70%), as set out by the Waste Framework Directive (2008/98/EC)[74], should be considered 'minimum acceptable practice' for the construction and operation of any new airport infrastructure. Exceeding these targets if possible by aiming for exemplar performance in resource efficiency and waste management is recommended. Paragraph 5.141 of the ANPS states that the Applicant should set out the arrangements that are proposed for managing any waste produced in the application for development consent. The arrangements described should include information on the proposed waste recovery and disposal system for all waste generated by the development. The Applicant should seek to minimise the volume of waste

[74] [redacted]

sent for disposal unless it can be demonstrated that the alternative is the bestoverall environmental, social and economic outcome when considered over the whole lifetime of the project. Paragraph 5.143 states that the Applicant should set out a comprehensive suite of mitigations to eliminate or significantly reduce the risk of adverse impacts associated with resource and waste management.

8.11.3 Paragraph 5.145 of the ANPS states that the SoS will consider the extent to which the Applicant has proposed an effective process that will be followed to ensure effective management of hazardous and non-hazardous waste arising from all stages of the lifetime of the development. The SoS should be satisfied that the process set out provides assurance that:

- Waste produced will be properly managed, both onsite and offsite;
- The waste from the proposed development can be dealt with appropriately by the waste infrastructure which is, or is likely to be, available. Such waste arising should not have an adverse effect on the capacity of existing waste management facilities to deal with other waste arising in the area; and
- Adequate steps have been taken to ensure that all waste arising from the site is subject to the principles of the waste hierarchy and are dealt with at the highest possible level within the hierarchy.

8.11.4 Paragraph 5.146 states that where necessary, the SoS will require the Applicant to develop a resource management plan to ensure that appropriate measures for sustainable resource and waste management are secured.

8.11.5 Paragraphs 5.39 to 5.45 in the NNNPS relate to waste management and largely repeat the advice provided in the ANPS.

8.11.6 The NPPF states that the framework should be read in conjunction with the Government's planning policy for waste which is contained within the Waste Management Plan for England (2021)[75]. Paragraph 8 relates to achieving sustainable development through three overarching objectives including the 'environmental' objective whereby opportunities to minimise waste and pollution should be taken.

Assessment

8.11.7 **Annex 5 of Appendix 5.3.2: Code of Construction Practice** (Doc Ref. 5.3) is the **Construction Resources and Waste Management Plan**. The purpose of the **Construction Resources and Waste Management Plan** is to demonstrate how waste has been considered in terms of the design of the Project. It also sets out measures for managing waste during construction to meet legislative and policy requirements which follows an assessment of the waste arisings expected during the construction phase. Measures for managing waste from the operational phase are set out in **ES Chapter 5: Project Description** (Doc Ref. 5.1).

8.11.8 On consent of the DCO, the **Construction Resources and Waste Management Plan** (Doc

[75] Waste Management Plan for England (publishing.service.gov.uk)

Ref. 5.3) will sit alongside the **Carbon Action Plan (ES Appendix 5.4.2)** (Doc Ref. 5.3) and GAL's Sustainability Strategy 'Second Decade of Change to 2030'[76]. Measures introduced as part of that strategy will be extended to include the Project. The issue with most relevance to the waste strategy is zero waste by ensuring that *'by 2030 all materials used at Gatwick in operations, commercial activity and construction, are repurposed for beneficial use i.e. repaired, reused, donated, recycled, composted or converted to fuel for heating or transport.'*

8.11.9 The **Construction Resources and Waste Management Plan** (Doc Ref. 5.3) is the principal mechanism for demonstrating how waste minimisation will be applied and achieved throughout the detailed design and construction stages.

8.11.10 Site Waste Management Plans (SWMPs) will be prepared for each Project area or works during the detailed design stage and updated throughout the construction period by GAL and its Principal Contractor(s). The SWMPs will be internal documents but will be made available to the local planning authorities during the construction period on request. Site Waste Management Plans (SWMPs) will be prepared (following the template in the **Construction Resources and Waste Management Plan**) during the detailed design stage to record design decisions and construction techniques to minimise waste.

8.11.11 GAL will also undertake periodic audits of the waste management facilities used during the construction and operation of the Project. This is to ensure that the Project's duty of care obligations are being met.

8.11.12 The reuse of excavated material on the site will be managed in accordance with the Definition of Waste: Development Industry Code of Practice (CoP) (CL:AIRE, 2011)[77] and will be documented in a CL:AIRE Materials Management Plan (MMP). The CL;AIRE MMP will be prepared post consent and will be approved by the Environment Agency and CL;AIRE.

8.11.13 **The Construction Resources and Waste Management Plan** (Doc Ref. 5.3) confirms that all waste generated by the Project would be managed in accordance with the waste hierarchy unless it can be demonstrated that the alternative is the best overall environmental outcome.

8.11.14 In terms of construction and demolition waste (excluding spoil), the following targets have been set for the Project:

- divert 90% of uncontaminated demolition materials from landfill; and
- divert 80% of uncontaminated construction waste (ie. non-demolition waste) from landfill.

8.11.15 These targets are in line with the good practice targets set in the Building Research Establishment Environmental Assessment Methodology BREEAM New Construction Manual (BRE Global Ltd, 2018)[78]. The targets exceed the target set by the Waste (England and Wales) Regulations 2011 (as amended), which requires that a minimum of 70% of

[redacted]

construction and demolition waste should be prepared for reuse, recycling or other material recovery.

8.11.16 Section 5.5 of the **Construction Resources and Waste Management Plan** (Doc Ref. 5.3) sets out the waste management measures that would be adopted for the construction stage. This includes details about how measures have been embedded into the design of buildings and structures following guidance from industry bodies to reduce the amount of waste produced including using pre-fabricated materials for on-site assembly; designing buildings/structures to standard dimensions of blocks or frames to avoid off-cuts; reducing wastage when ordering materials and retaining spoil on site where practicable including that which has been generated through lowering ground levels in Museum Field. The target for construction waste resource efficiency for new buildings is ≤11.1 tonnes of waste generated per 100 m^2 (gross internal floor area) and is in line with BREEAM New Construction Manual (BRE Global Ltd, 2018).

8.11.17 In terms of operational waste, both airside and landside waste at the airport is currently taken to the existing CARE facility, which is located within an area of the existing airfield to the north of Taxiway Juliet. Facilities include the existing waste processing building (including a biomass boiler), compound area extending to 2,600 m^2 , materials recovery facility (MRF) and bin store covering a further 2,500 m^2.

8.11.18 The proposed replacement CARE facility would be located to the north-west of Pier 7. The facility would process the majority of airport waste (with the exception of food waste from international flights (also known as international catering waste (ICW)). ICW is a high risk category 1 waste and is therefore, subject to different management requirements. The existing CARE facility would remain in operation until the new CARE facility has been commissioned. The proposed replacement CARE facility would process food waste for energy (heat), as does the current facility, although to provide for growth associated with the Project it would need to process a larger volume of food waste and would therefore need to be larger in scale. There would be two biomass boilers (one pre-existing to provide for the relocated 650 kw plus an additional 450 kv to provide for growth). There would be a materials recovery facility to allow sorting of waste. A storage area would be provided for baled waste for collection by external suppliers from both landside and airside operations. The building would occupy an area of approximately 17,550 m^2. The main building would be up to 22 metres in height with a biomass boiler flue that would be up to 48 metres above ground level and there would be elements up to 5 metres below ground level. The proposed replacement CARE facility offers the opportunity to manage greater quantities of waste by providing a larger area for vehicle management, material sorting and holding areas for bulked up waste.

8.11.19 As part of the Second Decade of Change, GAL is looking at resource efficiency and the circular management of materials as an alternative approach to reduce waste. As part of this work, GAL has prepared a Zero Waste Roadmap that will set out how the goal of zero waste will be delivered. The Roadmap will provide a clear set of key performance indicators as well as defining the metrics to be used for reporting and interpreting waste data.

Planning Policy Compliance

8.11.20 GAL's Project target for construction waste (divert 90% of demolition materials from landfill;

and divert 80% of construction waste ie. non-demolition waste from landfill) goes beyond the 70% target set out in the Waste Framework Directive which is a repeated requirement in the ANPS (paragraph 5.137).

8.11.21 In accordance with paragraph 5.136 of the ANPS, the **Construction Resources and Waste Management Plan** has been developed to reflect the waste hierarchy for sustainable waste management.

8.11.22 In accordance with paragraphs 5.143 and 5.146 of the ANPS, the **Construction Resources and Waste Management Plan** sets out mitigation measures to eliminate or significantly reduce the risk of adverse impacts associated with resource and waste management including setting waste recovery targets which are aligned with Gatwick's Second Decade of Change and producing a SWMP and MMP which will sit alongside the CoCP – all of which will be secured as part of the DCO.

8.11.23 In accordance with paragraph 5.145 of the ANPS, the measures set out in **ES Chapter 5: Project Description** (Doc Ref. 5.1) will ensure that GAL build on their already successful process of managing waste both onsite and offsite and that waste from the proposed development can be dealt with appropriately by the waste infrastructure which will be available through replacing the existing CARE facility with a new one. This matter can be afforded positive weight in the planning balance.

8.12 Flood Risk

Policy Context

8.12.1 Paragraphs 5.153 to 5.171 of the ANPS set out the national approach to flood risk in relation to airport development. Flood risk assessments are required for applications for projects within Flood Zones 2 & 3 and those within Flood Zone 1 comprising one hectare or more (paragraph 5.152 of the ANPS).

8.12.2 Paragraph 5.153 of the ANPS requires the consideration of the risk from all sources of flooding to development or arising from the development and a need to demonstrate how these risks will be managed and, where relevant, mitigated, so that development remains safe through its lifetime.

8.12.3 The ANPS requires flood risk assessments to take into account; the impacts of climate change, clearly stating the Project lifetime over which the assessment is made; any residual risks after risk reduction measures have been taken into account and demonstrating how these are acceptable for the Project; consideration of the need to remain operational during a worst-case flood event during the Project's lifetime and the need for safe access and exit arrangements; and provide evidence relating to the Sequential Test and Exception Test (paragraph 5.154).

8.12.4 Paragraphs 5.158 to 5.165 and 5.178 to 5.181 of the ANPS outline the requirements to mitigate the impact of flooding including to ensure that surface runoff does not increase and the requirement to apply a sequential approach.

8.12.5 The requirements in the NNNPS insofar as they relate to flood risk (paragraphs 5.90 to 5.115) are largely comparable to those as set out in the ANPS.

8.12.6 Section 14 of the NPPF relates to meeting the challenge of climate change, flooding and

coastal change and includes considerations relating to the impact of climate change to flood risk, coastal change and water supply. The NPPF seeks to direct development away from areas at greatest risk of flooding.

8.12.7 Paragraphs 152 to 173 of the NPPF set out specific flood risk policies to be followed by all proposed developments. The policies set strict tests to protect people and property from flooding. The main steps are designed to ensure that if there are better sites in terms of flood risk, or a proposed development cannot be made safe for its lifetime, ensuring flood risk is not increased elsewhere, it should not be permitted.

Assessment

8.12.8 **ES Chapter 11: Water Environment** (Doc Ref. 5.1) provides an assessment of the Project on the water environment (including flood risk and surface water drainage).

8.12.9 The water environment interfaces with other environmental disciplines including ecology and nature conservation (which includes aquatic habitats and ecology) and geology and ground conditions. These are assessed in other chapters of the **ES** namely, **Chapter 9: Ecology and Nature Conservation** and **Chapter 10: Geology and Ground Conditions** (Doc Ref. 5.1).

8.12.10 **Table 11.4.1** in **ES Chapter 11** summarises the potential impacts of the Project through the construction period, first operations of the dual runways and up to construction of the final elements. The potential effects relating to flood risk are summarised below.

Issue	Potential Effects
Construction Period (including demolition)	
Flood Risk	Temporary storage of materials reduces the volume of floodplain storage increasing flood risk.
	Increased flood risk due to existing surface water flow paths being interrupted, diverted or created by construction works, or due to increased compaction of ground or increase in impermeable area.
	Failure of temporary over-pumping arrangements of the surface water drainage and wastewater networks resulting in flooding.
	Dewatering for foundations, basement and other sub-surface structures resulting in changes to groundwater levels and flow routes and altering flood risk, exacerbated due to potential hydraulic connectivity between groundwater and surface water resources.
	Temporary works for outfalls etc. within river channels leading to increase in flood risk.
	Change in drainage strategy altering flows to receiving watercourses affecting flood risk, geomorphology and water quality. Discharges from construction activities leading to increased flows to the surface water network increasing the risk of flooding from the surface water drainage. Sediment from construction areas washed off into surface water drainage causing blockage and flooding.

	Construction activity leading to physical damage to surface water drainage assets and causing flooding.
	Temporary haul roads during construction periods
Operational Period	
Flood Risk and Surface Water Drainage	Increased runoff due to additional impermeable areas increases flood risk.
	Changes to channel structures (eg culverts) reduces capacity and increases flood risk.
	Changes in drainage strategy – increased runoff leading to an increase in flood risk.
	Increased fluvial flood risk due to loss of floodplain storage arising from elements of the Project within the floodplain.
	Increased flood risk due to existing surface water flow paths being interrupted, diverted or created by the Project, or due to increased impermeable area.
	New development placing more people (working and using the airport) or assets in path of potential reservoir failure flow path.
	Foundation/box structures intercepting/diverting groundwater flow leading to waterlogging and/or groundwater flooding.
	Increased runoff due to additional impermeable areas increases flood risk.
	Changes to the A23 resulting in increased surface water runoff increasing flood risk.

8.12.11 In order to assess the effects of the Project in terms of flood risk, a baseline assessment of all sources of flood risk and surface water drainage has been undertaken. The findings are reported in a **Flood Risk Assessment (FRA)** (**ES Appendix 11.9.6)** (Doc Ref. 5.3). The FRA considers baseline flood risk to the Project from all sources, including fluvial, surface water, groundwater, flooding from reservoirs and sewer/ water supply flooding. The assessment is primarily based on site-specific fluvial hydraulic modelling that has been developed by Gatwick in partnership with the Environment Agency.

8.12.12 Flood risk from groundwater and water supply sources have been assessed based on existing available information and previous known flooding incidents within the study area. A qualitative assessment has been undertaken to identify areas that could be vulnerable to groundwater flooding. The assessment also considers the potential for increases in flood risk occurring elsewhere due to the Project.

8.12.13 Gatwick Airport is located in the Thames River Basin District and within the Upper Mole catchment. The River Mole flows through the airport, passing under the main and existing northern runways in culvert. Tributaries of the River Mole, including the Crawter's Brook, the Gatwick Stream and Westfield Stream all run through or adjacent to the Project boundary. Therefore, fluvial flood risk is the primary risk of flooding to the Project.

8.12.14 The Project boundary includes areas within Flood Zones 2 and 3 (as identified in **Figure 11.6.4** in **ES Chapter 11**). These are associated with the River Mole, Westfield Stream, Man's Brook and Crawter's Brook on the western and southern sides of the airport and with

the Gatwick Stream on the eastern side. Beyond the Project boundary, the Flood Zones are quite extensive and include a number of potential receptors for the Project, including residential areas and transport infrastructure that serves both Gatwick Airport and the wider region.

8.12.15 There are areas of the airport at risk of fluvial flooding in the existing scenario from a 1 per cent (1 in 100) AEP event. Should such predicted flooding occur, it would be managed to ensure the safety of passengers and staff by existing GAL procedures as summarised in the **Flood Resilience Statement** (see Annex 6 of ES **Appendix 11.9.6 Flood Risk Assessment)** (Doc Ref. 5.3).

8.12.16 Flooding is primarily associated with the River Mole and Crawter's Brook on the western and southern sides of the airport, and with the Gatwick Stream on the eastern side, around the South Terminal building.

8.12.17 The Sequential Test has been applied to the Project (see Section 5.10 in **ES Appendix 11.9.6 Flood Risk Assessment)** (Doc Ref. 5.3). The majority of the altered northern runway and Project taxiways located in the western part of the airport fall within Flood Zone 2. Alternative locations for the Project, outside of Flood Zone 2 and 3. Therefore the Sequential Test for the Project as a whole is considered to be satisfied.

8.12.18 The Exceptions Test has also been applied to the Project (see Section 5.10 in **ES Appendix 11.9.6 Flood Risk Assessment)** (Doc Ref. 5.3). The Exceptions Test requires the Applicant to demonstrate that a proposed development will provide wider sustainability benefits to the community that outweigh flood risk; and that it will be safe for its lifetime, without increasing flood risk elsewhere and where possible reducing flood risk overall. This Statement demonstrates that the Project will bring benefits to the community. Section 7 in **ES Appendix 11.9.6 Flood Risk Assessment** (Doc Ref. 5.3) demonstrates that the flood mitigation strategy ensures the Project will remain safe throughout its lifetime and does not increase flood risk elsewhere.

8.12.19 The assessment of existing surface water flood risk to the Project has been based on the Environment Agency Risk of Flooding from Surface Water mapping (RoFSW) and surface water modelling produced for the Project by Gatwick.

8.12.20 Surface water flooding occurs in several areas of the airport. Areas at high risk are predominately associated with areas around existing watercourses or drainage features, although there are isolated pockets of high risk likely to be the result of rainfall filling local depressions rather than overland flow paths.

8.12.21 British Geological Survey (BGS) mapping identifies that there is susceptibility to groundwater flooding throughout areas of the site underlain by superficial deposits. There is also identified susceptibility to groundwater flooding from the Tunbridge Wells Sand.

8.12.22 Gatwick operates the two long term storage lagoons adjacent to Crawley Sewage Treatment Works (STW) that receive contaminated runoff. In addition, Gatwick has a complex water distribution and sewer network that is a potential source of flood risk.

8.12.23 For flood risk and surface water drainage, the main source of future change to baseline conditions is climate change.

8.12.24 **Table 11.7.1** in **ES Chapter 11** identifies maximum design scenarios applied to the

assessment of potential effect of the Project.

8.12.25 A number of mitigation measures are incorporated into the Project to meet national planning policy to ensure no increase in fluvial flood risk to other parties. These include:

- Museum Field floodplain compensation area (FCA);
- Car Park X FCA;
- realignment and naturalisation of the River Mole downstream (north) of the northern runway;
- two syphons beneath taxiway Yankee and the western end-around taxiway to maintain floodplain connectivity;
- six syphons beneath the north-west noise bund to maintain floodplain connectivity; and
- six culverts underneath active travel path associated with surface access works at Car Park Y.

8.12.26 Similarly, mitigation measures to ensure no increase in surface water flood risk to other parties, and to reduce the risk of flooding to assets at Gatwick include:

- attenuation storage in a new facility at Car Park Y to reduce risk of surface water flooding to the North Terminal;
- attenuation storage within the airfield surface water drainage network; and
- a new surface water attenuation feature and pumping station to mitigate the additional hard standing being created in the Pond A Catchment and mitigate for the removal of Pond A.

8.12.27 In relation to flood risk and surface water drainage, during the initial construction period, the potential impacts of the Project (Proposed Juliet West Taxiway and End Around Taxiways) would result in increased flood risk due to loss of floodplain storage, increased impermeable area and temporary structures in or near watercourses. There would also be an increase in impermeable area increasing risk of surface water flooding. This scenario would reduce floodplain storage and increase the rate and volume of runoff if no mitigation was in place (long-term impact for taxiways). Similarly for the assessment period 2029 to 2032, the proposed highways access works are also assumed to encroach into floodplain.

8.12.28 Pentagon Field is proposed for inert spoil arising from the project to be placed and landscaped. The northern edge of Pentagon Field is at risk of surface water flooding. Surface access improvement works could also be detrimental to the water environment by increasing flood risk due to encroachment into the floodplain and increased runoff. Temporary services, pedestrian and vehicle watercourse crossings could potentially increase flood risk on the River Mole. These and other works, including embedded mitigations (e.g. flood compensation areas) themselves could have associated effects on the water environment, if unmitigated.

8.12.29 A summary of potential effects of the Project in terms of flood risk is set out in **Table 11.13.1** of **ES Chapter 11**. During the initial construction period 2024 – 2029 works would generally be contained within the existing operational airport boundary. Outside the airport boundary the construction of flood mitigation measures and the establishment of construction compounds would take place. In addition, the surface access improvement works would commence towards the end of this initial construction period.

8.12.30 During the initial construction period, existing surface water flow paths may be interrupted,

diverted or created by construction works, due to increased compaction of ground, increase in impermeable area, or by level changes as a result of temporary works. The discharge of groundwater as a result of dewatering of foundations, basement and other sub-surface structures could result in changes to surface water flow paths. Potential effects of the Project in terms of surface water flood risk are not significant (negligible to minor adverse effects).

8.12.31 Similarly, the risk of fluvial flooding due to the loss of floodplain storage could occur due to construction activities in floodplain areas, including the works in river channels. The potential effects of the Project are assessed as ranging from minor beneficial to minor adverse and not significant.

8.12.32 Over the same initial construction period, an increase in the risk of groundwater emergence could occur as a result of construction activities lowering ground levels or impeding groundwater flows. The effects are assessed as negligible to minor adverse and not significant.

8.12.33 Despite the additional losses of existing floodplain (fluvial flooding) over the period 2029 to 2032, the provision of the associated embedded mitigation measures as a part of the initial construction period reduces flood risk to residential and industrial properties (minor beneficial effect). There would be no change to the risk of flooding to transport infrastructure and a minor beneficial effect on airport infrastructure.

8.12.34 The change in flood risk to the grassed areas of the airfield would result in some areas experiencing a negligible to minor beneficial effect, and other areas a minor adverse effect. These effects are not significant.

8.12.35 All primary works that could impact flood risk would be complete by 2029. The measures implemented by this stage would ensure no further increase in flood risk would occur during the period 2032 to 2037.

8.12.36 By 2038, the introduction of new impermeable areas as part of the Project could result in increased surface water runoff in the long term, or cause alterations to existing surface water flow paths that could potentially increase flood risk. The removal of Pond A and the provision of additional attenuation storage within the Project results in no increase or decrease in discharge volumes and total peak runoff rates as a result of the Project. The assessment demonstrates the potential effects of the Project on residential and industrial properties and transport infrastructure would not be significant.

8.12.37 The provision of additional attenuation storage across the airfield within the surface water drainage network and a new underground tank beneath Car Park Y would mean there are no significant environmental effects would arise in relation to runways and taxi ways, terminal and piers, stands, waste management facilities, car parking or grassed areas.

8.12.38 Elements of the Project that fall within the floodplain could lead to a loss of floodplain storage and increase fluvial flood risk. Fluvial hydraulic modelling results (**Figure 11.9.1** and **Figure 11.9.2** in **ES Chapter 11**), show that for third party receptors anticipated flood depths would decrease by up to 100mm for those receptors adjacent to Gatwick. In relation to residential and industrial properties the resulting effect would be moderate to major beneficial and moderate beneficial respectively, and environmentally significant.

8.12.39 In relation to airport infrastructure, major beneficial effects are assessed in relation to

runways and taxiways, moderate to major beneficial effects for terminal and piers and moderate beneficial for car parking. Overall these effects are environmentally significant. A summary of the effects on airport infrastructure is provided in **Table 11.9.2** in **ES Chapter 11**.

8.12.40 The mitigation measures relevant to minimising flood risk to be adopted as part of the Project are listed in **Table 11.8.1** in **ES Chapter 11** and **ES Appendix 11.9.6 Flood Risk Assessment.**

8.12.41 In summary the following conclusions can be made with regards to flood risk during operation within the Project boundary:

- Fluvial flooding is the principal source of flood risk to the Project during operation. Levels of fluvial flood risk to proposed airport infrastructure would be equivalent to existing or reduced. Fluvial flooding is also the principal source of flood risk during construction. As the mitigation measures such as Museum Field and Car Park X storage areas are to be constructed in the first construction period, levels of fluvial flood risk during construction would be equivalent to existing or reduced.
- Surface water flooding is also a significant source of flooding. However, in most cases surface water flow paths and ponding areas are small in extent and do not encroach on proposed elements of the Project. Similarly, during construction existing surface water flow paths may be interrupted, diverted or created by construction works. Where minor adverse effects are still predicted to occur, surface water drainage will mitigate any risk.
- There is susceptibility to groundwater flooding in the Project areas underlain by superficial deposits. However, any groundwater flood risk due to the Project would be mitigated by adopting appropriate design practices.
- The risk of flooding from other sources during construction, including reservoirs and sewer flooding, is considered low.

Planning Policy Compliance

8.12.42 In accordance with the requirements set out within the ANPS (Paragraph 5.154) and the NPPF, a flood risk assessment has been prepared, which considers all forms of flood risk from and due to the Project and describes the proposed flood mitigation strategy that forms part of the Project. The assessment has been conducted having full regard to the guidance provided in the NPPG.

8.12.43 Consistent with paragraph 5.154 of the ANPS, the potential residual risks are discussed in Section 11.9 of the **ES** which demonstrate how these would be managed appropriately, ensuring that flood risk to the Project, or third parties within the study area, would not be increased.

8.12.44 As required by paragraph 5.152 of the ANPS, the **Flood Risk Assessment (ES Appendix 11.9.6)** (Doc Ref. 5.3) includes consideration of climate change impacts.

8.12.45 It has been demonstrated that the runways would not be flooded and would remain operational for such an event, if required. In terms of the terminal buildings and their surrounding areas, existing flood risk could potentially have an operational impact but Gatwick's Flood Threat Plan (**Appendix 11.9.6 Annex 6** of the **ES**) would ensure that any flooding would be safely managed. Dry access and egress routes above peak flood water levels are available via high-link bridges and multi-storey car parks from the terminal

buildings.

8.12.46 The flood risk assessment also demonstrates the Project's compliance with paragraphs 5.154 of the ANPS, paragraphs 5.90 – 5.115 of the NNNPS and the NPPF relating to the Sequential and Exception Tests.

8.12.47 The issue of Tidal/Coastal flooding was scoped out of the assessment given the distance of the airport from the nearest coastline and ground levels being generally above 55m above ordnance datum.

8.12.48 In summary, the Project has been assessed as being in accordance with relevant policies for flood risk and should be afforded positive weight in the overall planning balance.

8.13 Water Environment (Water Quality and Resources)

Policy Context

8.13.1 Paragraphs 5.172 – 5.174 of the ANPS prescribe a set of assessment considerations for water quality and resources.

8.13.2 Paragraph 5.175 of the ANPS requires development that is likely to have significant adverse effects on the water environment to 'ascertain the existing status of, and carry out an assessment of, the impacts of the proposed project on water quality, water resources and physical characteristics'.

8.13.3 Paragraphs 5.176 and 5.177 of the ANPS require assessments to include consideration of; baseline water quality, water resources and characteristics of the water environment; impacts of the Proposed Development on water bodies or protected areas under the Water Framework Directive (WFD), source protection zones and abstractions; impacts of the development on the water and wastewater treatment network; and cumulative effects.

8.13.4 Paragraphs 5.182 to 5.186 of the ANPS set out the requirements in respect of Project to consider interactions with Environment Agency requirements (in relation to water quality and resources), WFD requirements and environmental permitting.

8.13.5 The ANPS states at paragraph 5.183 that the SoS will generally need to give more weight to impacts on the water environment where a project would have adverse effects on the achievement of the environmental objectives established under the Water Framework Directive Compliance Assessment.

8.13.6 The requirements in the NNNPS insofar as they relate to the water quality and resources (paragraphs 5.219 to 5.231) are largely comparagraphble to those as set out in the ANPS. The NNNPS confirms that applicants should ascertain the existing status of, and carry out an assessment of the impacts on, water quality water resources and physical characteristics (geomorphology) as part of the ES.

8.13.7 Section 14 of the NPPF: 'Meeting the challenge of climate change, flooding and coastal change' is relevant to the water environment and considers the impact of climate change to flood risk, coastal change and water supply.

8.13.8 NPPF paragraph 174 states "… Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans."

8.13.9 Section 15 of the NPPF: 'Conserving and enhancing the natural environment' is also relevant to water quality. Paragraphs 174(e) and sets out the requirement of: 'e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution…'

8.13.10 The NPPF also states that development should, wherever possible, help to improve local environmental conditions including water quality.

Assessment

8.13.11 **ES Chapter 11** (Doc Ref. 5.1) provides an assessment of the Project on the water environment (surface water including geomorphology and water quality, groundwater, flood risk including surface water drainage, and water infrastructure including wastewater and water supply). Effects in relation to flood risk are considered in the previous section of this statement.

8.13.12 The water environment interfaces with other environmental disciplines including ecology and nature conservation (which includes aquatic habitats and ecology) and geology and ground conditions. These are assessed in other chapters of the **ES** namely, **Chapter 9: Ecology and Nature Conservation** and **Chapter 10: Geology and Ground Conditions** (Doc Ref. 5.1).

8.13.13 **Table 11.4.1** in **ES Chapter 11** summarises the potential impacts of the Project through the construction period, first operations of the dual runways and up to construction of the final elements. The potential effects relating to flood risk are summarised below:

Issue	Potential Effects
Construction Period (including Demolition): Water Environment	
Geomorphology	Sediment from construction areas washed off into watercourses increasing turbidity and impacting on morphology.
	Damage and loss of riparian vegetation.
	Damage and loss of natural bed and banks.
	Changes in flow (discharge and velocity) in channel and on floodplain.
	Changes in river continuity.
	Change in drainage strategy altering flows to receiving watercourses affecting flood risk, geomorphology and water quality.
	Modifications to groundwater recharge or flow paths could affect surface water flows due to connection via river terrace deposits.
Groundwater	Construction dewatering affecting groundwater levels flows, creating potential settlement and mobilisation of contaminants.
	Piling introducing contaminants and creating contaminant pathways.
	Modifications to groundwater recharge or flow paths could affect surface water flows due to connection via river terrace deposits.
	Spillage at surface impacting the quality of groundwater resources.
Water Quality	Contaminated runoff or spillage from construction areas impacting surface water quality.

	Dewatering for foundations/sub-surface structures resulting in changes to surface water quality.
	Change in drainage strategy altering flows to receiving watercourses affecting flood risk, geomorphology and water quality.
	Dewatering for foundations, basement and other sub-surface structures resulting in changes to groundwater flow and quality of groundwater resources (including any private water supplies, if present).
Wastewater	Increased flows during construction due to additional workers at the airport discharging to the wastewater network.
Water Supply	Increased demand on existing water supply/water resources to support construction activities.
Operational Period: Water Environment	
Geomorphology	Narrowing of channel width with extensions of culverts and bridge widening. Potential increase in stream energies locally. Loss and or damage to channel bed form and substrate.
	Homogeneity of channel cross-section with extension of culverts and bridge widening. Potential for loss of natural variance in velocities and secondary flows cells, leading to changes in velocity and geomorphological processes.
	Disruption of quantity and dynamics of flow and sediment supply, due to changes in bed and bank form, channel planform, cross-section and gradients. Potential effects due to extension of culverts, bridge widening, river renaturalisation and creation of FCA.
	Increased sediment supply. Damage to channel bank form.
	Change in sediment dynamics due to changes in runoff.
	Change in physicochemical quality due to changes to natural bed and banks.
	Loss and damage to riparian zone due to new structures and/or additional access requirements for maintenance.
	Loss of natural bank form and material.
	Reduction in channel – floodplain coupling due to extension of culverts and bridge widening.
Water Quality	Additional de-icer being used to address increase in air traffic movements, with potential impact on surface water quality if not appropriately stored and if contaminated runoff is not treated effectively.
	Runoff from increased impermeable areas increasing sediment and pollutant loadings in watercourses.
	Potential for air quality effects on surface water quality, ie airborne contaminants being deposited on the ground, ultimately ending up in surface water.
	Increased pollutant loadings resulting from increases in road traffic volumes could reach surface water features from accidental spillages

	via outfalls or other surface water pathways. This could include suspended solids and contaminants bound to them and oils and related compounds.
Groundwater	Discharges to ground, eg from road drainage impacting groundwater flows or levels.
	Foundation/box structures, piling or cuttings/underpasses intercepting/diverting groundwater flow leading to impacts on groundwater levels and/or flow.
	Increased impermeable areas (such as car parks) leading to a reduction in recharge to shallow groundwater, impacting both groundwater levels and quality and associated increased surface water flood risk.
	Change in groundwater flow paths from sub-surface structures affecting groundwater fed ecological features (such as wetlands).
Wastewater	Additional treated effluent from an increase in passenger and staff numbers impacting surface water quality if appropriate wastewater collection and treatment is not provided.
	Increased discharges to the existing wastewater sewer system leading to flooding if insufficient capacity is available.
	The provision of new pumping stations creating a risk of flooding within the airport, both landside and airside (in event of failure).
Water Supply	Increase in potable water demand, requiring new infrastructure and affecting sustainability of supply from local water resource zone.

8.13.14 The assessment of the Project on the water environment includes the consideration of potential effects on:

- surface water (comprising geomorphology and water quality)
- groundwater
- water infrastructure (comprising wastewater and water supply).

8.13.15 The assessment of effects is informed by a range of supporting studies which comprise appendices to ES Chapter 11 (all in Doc Ref. 5.3) including:

- Geomorphology Assessment (**ES Appendix 11.9.1**);
- Water Framework Directive Compliance Assessment (**ES Appendix 11.9.2**);
- Water Quality HEWRAT Assessment (**ES Appendix 11.9.3**);
- Water Quality De-Icer Impact Assessment (**ES Appendix 11.9.4**);
- Groundwater Assessment (**ES Appendix 11.9.5**);
- Wastewater Assessment (**ES Appendix 11.9.7**); and
- Water Supply Assessment (**ES Appendix 11.9.8**).

8.13.16 A range of issues were scoped out of the assessment of the water environment, including:

- Groundwater impact on public water supply - There are no public water supply boreholes in the study area and the nearest Source Protection Zone for public supply boreholes is over 8 km away.

- Groundwater Dependent Terrestrial Ecosystems (GWDTEs) - No potential GWDTE have been identified within the study area
- Geomorphological impacts on Withy Brook, Man's Brook and Burstow Stream - The geomorphology of the watercourses is not considered to be impacted by the Project on Withy Brook, Man's Brook and Burstow Stream as they are all over 1 km upstream or downstream of the Project. No change would be expected on these watercourses.
- Geomorphological impacts on Ifield Brook, Stanford Brook, Baldhorns Brook and the Mole (Hersham to River Thames confluence at East Molesey). The geomorphology of the watercourses is not considered to be impacted by the Project on Ifield Brook, Stanford Brook and Baldhorns Brook as they are all >3 km upstream of any Project and following review of likely flow velocities. No change would be expected on these watercourses. The Mole (Hersham to River Thames confluence at East Molesey) has also been scoped out. Whilst it is an adjacent water body to the Project, it is over 60 km downstream of any Project.

8.13.17 The assessment of potential effects is based upon a study area generally defined by a 2km radius beyond the Project boundary (e.g. for surface water quality) on the basis that impacts are predicted to occur in close proximity to the Project boundary except where a hydrological pathway was identified.

8.13.18 For geomorphological effects, the adopted study area covers the catchments of the receptors identified and a smaller site study area has been defined based on the channels that would be directly impacted (**Figure 4.1.1** in **ES Appendix 11.9.2).**

8.13.19 The catchments of the receptors cover a combined extent of 237km^2, including the River Mole upstream of Horley, River Mole (Horley to Hersham), Tilgate Brook and Gatwick Stream at Crawley, and Burstow Stream, which intersect within the Project boundary.

8.13.20 For wastewater the assessment of potential effects is limited to the infrastructure at Gatwick. For water supply the assessment of potential effects is limited to the water source and does not cover deficiencies in water infrastructure.

8.13.21 Key water environment features relevant to the assessment of the Project are identified in **Figure 11.6.1** of **ES Chapter 11**. The study area includes a number of water features ranging from watercourses, streams, ditches and ponds. The study area is located within the River Mole catchment within the Thames River Basin District where the majority of WFD water bodies have an objective to reach 'good' status for both ecological and chemical water quality elements by 2021 or 2027.

8.13.22 Watercourses comprising the River Mole, Gatwick Stream, Crawter's Brook, Man's Brook and Burstow Stream Tributary have the potential to be directly or indirectly impacted by the Project. The catchment terrain of these watercourses is dominated by the Low Weald topography of the Wealden Basin and is underlain by clay of the Wealden Group. Surface geology mainly comprises alluvium and river terrace sands and gravels.

8.13.23 The River Mole, Burstow Stream, Gatwick Stream, Tilgate Brook, Man's Brook and Crawter's Brook are statutory Main Rivers. Minor watercourses within the study area include Withy Brook and Haroldslea Stream. These watercourses are considered to have the potential to be directly or indirectly impacted by the Project for surface water quality.

8.13.24 There are no Nitrate Vulnerable Zones (NVZs) or Drinking Water Protected Areas (surface

water) within the study area. In contrast there is a Drinking Water Safeguard Zone for surface water across the airport site and wider study area.

8.13.25 In relation to water quality, the use of de-icer at the airport is an important consideration. Details of the airfield surface water drainage and pollution control systems are shown in **Figure 11.6.1** in **ES Chapter 11**.

8.13.26 The airport wastewater network comprises two discrete systems: one serving the North Terminal and discharging to Thames Water's Crawley sewage treatment works, and a second network serving the South Terminal and a hotel development on the North Terminal site discharging to Thames Water's Horley sewage treatment works approximately 6 km to the north of the airport via the trunk sewer system.

8.13.27 A number of measures have been designed into the Project to reduce the potential for impacts on the water environment.. These are listed in **Table 11.8.1** in **ES Chapter 11**. In summary these include:

- Provision of compensatory flood storage
- Additional attenuation storage within the existing airfield surface water drainage network
- Realignment and renaturalisation of the River Mole
- New section of River Mole channel at existing runway culvert exit
- Burstow Stream Tributary culvert design
- Provision for new airfield syphons
- Provision for new noise mitigation feature syphons
- Surface access improvements drainage strategy
- Additional de-icer treatment from Long Term Storage Lagoons
- Wastewater System Capacity Upgrades
- Geomorphological mitigation for River Mole re-naturalised channel and valley
- Geomorphological mitigation for flood compensation areas
- Geomorphological mitigation for River Mole channel extension within the Juliet taxiway planform
- Geomorphological mitigation for Burstow Stream Tributary culvert extension
- Groundwater mitigation

8.13.28 In addition there will be a range of monitoring activities relating to water quality, groundwater quality and geomorphological monitoring and best practice measures during construction as set out in **Annex 1 of ES Appendix 5.3.2 Water Management Plan** (Doc Ref. 5.3). Enhancements are also proposed in the form of the creation of a fish passage on the River Mole weir and creation of a small weir on the River Mole runway culvert.

8.13.29 In addition to the measures identified above, a number of further measures are proposed in order to manage potential impacts associated with construction activities. These will be implemented through the **Code of Construction Practice (CoCP)** in **ES Appendix 5.3.2** (Doc Ref. 5.3); the **Outline Construction Workforce Travel Plan** as provided in **ES Appendix 5.3.2 Annex 2** (Doc Ref. 5.3) and the **Outline Construction Traffic Management Plan** in **ES Appendix 5.3.2 Annex 3** (Doc Ref. 5.3).

8.13.30 A number of measures would be implemented to mitigate effects of the Project on the water environment during construction including:

- Constructing adequate temporary Sustainable Drainage Systems (SuDS) or conventional drainage to contain surface water and silt during the construction period.
- Identifying the location of services before any work commences to avoid any damage during construction.
- Ensuring adequate dewatering takes place during excavation activities or construction of subsurface features and foundations, in line with any permitting requirements.
- Ensuring dewatering does not mobilise existing contamination or lead to settlement or other such effects.
- Piling risk assessment (in accordance with the Environment Agency guidance) including mitigation of risk to controlled waters during piling installation to ensure piling works do not create preferential pathways for contamination.
- Ensuring the drainage system has adequate capacity to store any additional surface water runoff or groundwater required to be pumped out of excavations.
- Implementation of measures to protect groundwater during construction, including good environmental practices.
- Implementation of water efficiency measures to minimise additional water use, such as pressure management, grey water recycling and rainwater harvesting, and water efficient controllers on tap and urinals.
- Where river realignment is proposed, construction activities should be planned to ensure no increase in fluvial flood risk, with temporary mitigation provided if required.
- Where the construction of Project elements within the floodplain is proposed, phasing would be developed to ensure adequate mitigation is provided prior to the loss of any floodplain as a result of construction activities, where reasonably practicable. Where this is not practical, ensure temporary floodplain compensation is provided if the construction activities would increase flood risk elsewhere.
- Constructing the River Mole renaturalised channel offline and leave to vegetate over before flow is initiated down the channel. This would reduce the release of fine sediment and the likelihood of any unexpected large-scale channel change.
- Preparing an incident response plan prior to construction. This would be present on site throughout construction, informing all site workers of required actions in the event of a flooding incident.
- Using site materials free of contamination, avoiding any potential contamination of local surface water flow paths.
- Ensuring that wet cement does not come in to contact with surface water or groundwater.
- Measures to control the storage, handling and disposal of potentially polluting substances during construction should be implemented.
- Material stockpiles should be located a reasonable distance away from any watercourses and/or overland flow paths.

8.13.31 The assessment of potential effects of the Project on the water environment has been based on the maximum design scenarios which are summarised in **Table 11.7.1** in **ES Chapter 11** (Doc Ref. 5.1).

8.13.32 The assessment of the Project has considered potential impacts on the water environment for the initial construction period 2024-2029, 2030-2032 (which would include much of the highways improvements and the first full year of opening in 2029), 2033-2038 and the design years 2038 and 2047. The significance of effects is summarised within **Table 11.13.1** in **ES Chapter 11** (Doc Ref. 5.1).

8.13.33 The capacity of the public sewer network to which the private Gatwick wastewater system discharges and the downstream STW is the responsibility of Thames Water under the terms of its licence as the statutory authority. Discussions with Thames Water are ongoing to agree the quantity and distribution of discharges from the airport in the future. If capacity issues are identified, Thames Water will be responsible for reinforcing their network to support development as part of their statutory undertaking and they will recoup their costs through typical infrastructure charges to the consumer. The anticipated effect on the Thames Water wastewater infrastructure resulting from the Project is therefore based on the projected increase in wastewater flows pending completion of any mitigation works. This, and the mitigation works required (if any) are to be confirmed by Thames Water. In the event that there is not sufficient capacity, ot that improvements cannot be made to provide this capacity, an expansion to the existing Crawley STW may be required. This would be undertaken separately by Thames Water. However, an area of land has been identified to allow the expansion on land owned by GAL should this be required.

8.13.34 During the initial construction period (2024 – 2029), works would generally be contained within the existing operational airport boundary (the surface access highways improvements would follow later) with some additional activities taking place beyond the boundary.

8.13.35 General airfield construction activities have the potential to impact geomorphology on all watercourses. The effects assessed range from negligible to minor adverse effects which are not significant.

8.13.36 Similarly, in relation to effects on water quality from highway improvements and car parks, construction activities have the potential to impact water quality on all watercourses. These impacts may include the following:

- increase to suspended sediment loads due to channel disturbance from working in the channel, and runoff from construction areas. Impacts to suspended solid concentrations, alterations to pH and turbidity; sediment transport and bed substrate downstream; and
- accidental spillage of potentially harmful pollutants e.g., fuels, oils, lubricants.

8.13.37 The effects of the Project arising from constriction activities during this period upon the River Mole, Gatwick Stream and Burstow Stream have been assessed as minor adverse and not significant.

8.13.38 In relation to the use of de-icer on the airfield, the effect on water quality arising from the Project is considered to have a moderate beneficial effect and therefore significant. The effect of the increased use of de-icer due to the increase in ATMs and additional pavement areas is mitigated by the new de-icer treatment system to be provided at the long term storage lagoons, and additional runoff attenuation storage at the Car Park Y facility. The treatment works and additional attenuation reduces the risk of runoff contaminated with de-icer to the River Mole (high sensitivity) and improves river quality for Biochemical Oxygen demand from Bad to Good. This is a significant improvement.

8.13.39 In relation to groundwater, potential effects of the Project are assessed as ranging from negligible adverse to minor adverse, save in relation to the design stage where potential impacts to high and very high sensitivity structures (which include airport infrastructure, transport infrastructure, residential/commercial buildings, and listed buildings) as a result of

differential settlement effects cannot be ruled out. Accordingly such effects range from minor adverse to moderate adverse and could be environmental significant.

8.13.40 During the first full year of opening, change to the geomorphology of surface waterbodies is expected to continue as the watercourses adapt and adjust to construction works associated with various watercourses. Best practice measures to mitigate the construction impacts would continue to control the impacts.

8.13.41 Surface access works would continue, with construction concluding in 2031 for the Longbridge Roundabout, South Terminal Roundabout and North Terminal Roundabout improvement works. Construction impacts on water quality associated with these works are anticipated to be the same as those outlined in the initial construction period (2024-2029). Similarly the effect of the increased use of de-icers upon water quality would remain the same (a moderate beneficial effect which is environmentally significant).

8.13.42 No additional effects on groundwater above those assessed in the initial construction period would be anticipated as a result of the continued construction and operation commencing in 2029.

8.13.43 In relation to water infrastructure, effects range from negligible to minor adverse for waste water and water supply, and not significant.

8.13.44 For the period 2032-2037, the effects of the Project construction works on the watercourses (undertaken in earlier periods of construction) would have stabilised, and it is not anticipated that there would be any further adverse effects.

8.13.45 Similarly, changes to the geomorphology of surface waterbodies is expected to continue as the watercourses adapt and adjust following construction works associated with various watercourses.

8.13.46 The interim assessment year (2032) would see peak daily passenger numbers increase by approximately 19 per cent compared to the 2032 future baseline. The increase in wastewater flows would add to the wastewater system loading throughout the network so would have a potential low long-term impact on the wastewater drainage system. The wastewater sewer system has adequate capacity to accommodate the increase in flows and therefore is considered to have a negligible adverse effect which is not significant.

8.13.47 By 2038, the diversion of the River Mole into a two-stage channel includes the reinstatement of a more natural planform and restoration of more natural morphology. During operation, this would have a long-term effect of improving the flow regime and channel diversity. There would also be floodplain and re-meandering enhancements, as well as to floodplain coupling/connection. Planting of natural floodplain vegetation would improve riparian habitats and improve bank stability. The effects are assessed as moderate beneficial and therefore environmentally significant.

8.13.48 All effects of the Project on surface water (geomorphology) in 2038 are of a negligible to minor adverse effect and not significant.

8.13.49 A moderate beneficial effect on water quality through the provision of a new de-icer treatment at the long term st-rage lagoons continues at 2038. Similarly in relation to groundwater and waste water, ongoing effects of the Project are assessed as ranging from negligible to minor adverse, and not significant.

8.13.50 In relation to water supply, water demand will increase due to increase in passenger, staff and construction worker numbers through the existing Project boundary, during construction, and following completion of the terminal improvements and additional hotel and commercial facilities. This can be partially mitigated through introduction of water efficiencies during construction of new facilities. There are no significant effects either during the construction phase or the operational phase.

8.13.51 By 2047 effects of the Project in relation to water quality of watercourses from the proposed highway improvements and car parks are of a minor adverse effect and not significant. In relation to the effect of de-icer, the Project is assessed to continue to have a moderate beneficial effect which is significant. The additional attenuation volume created alongside the new treatment works reduces the risk of runoff contaminated with de-icer to the River Mole with consequent improvements to river quality.

8.13.52 The impact of climate change is an integral part of the assessment for the water environment. Impacts such as increased severity and frequency of droughts and floods, changes to rainfall patterns in terms of rainfall intensity, and seasonal and annual rainfall totals, are relevant to the assessment of different water environment elements. Other aspects such as changes related to cold weather events impact on airport de-icing operations.

Planning Policy Compliance

8.13.53 The Project complies with the requirements of paragraphs 5.172 to 5.174 of the ANPS which requires all surface water and groundwater receptors to be identified within the adopted study area.

8.13.54 As required by paragraphs 5.219 to 5.231 of the NNNPS, the **ES** includes detailed descriptions and analysis of water quality and water resources.

8.13.55 The existing status of water resources in the study area is summarised in **Section 11.6 in ES Chapter 11** (Baseline Environment) and the impacts are assessed and summarised in **Section 11.9** in **ES Chapter 11** (Doc Ref. 5.1).

8.13.56 The consideration of the impacts and effects of the Project on the water environment as a result of the highways improvement proposals is considered by **ES Appendix 11.9.3 Water Quality HEWRAT Assessment** (Doc Ref. 5.3) which addresses the requirements of the ANPS (paragraph 4.7).

8.13.57 The assessment of effects also considers, consistent with the requirements of paragraphs 4.46 to 4.49 of the ANPS, the influence of climate change.

8.13.58 The Project has been assessed in accordance with paragraphs 5.182 to 5.186 of the ANPS and paragraph 174(e) of the NPPF. The methodology, definition of baseline conditions and assessment provided in the **ES** has been informed by engagement with the Environment Agency.

8.13.59 To satisfy paragraphs 5.176 and 5.177 of the ANPS, a **Water Framework Directive Compliance Assessment** has been completed, in line with methodology agreed with the Environment Agency **(ES Appendix 11.9.2)** (Doc Ref. 5.3).

8.13.60 Compliance with the water quality requirements of the NPPF (Section 15, Water Quality) are

also demonstrated in **ES Appendix 11.9.2 Water Fraework Directive Compliance Assessment** (Doc Ref. 5.3) and in Section 11.9 in **ES Chapter 11** (Doc Ref. 5.1).

8.13.61 In summary, the Project has been assessed as being in accordance with relevant policies for water quality and resources. The Project will not result in any unacceptable levels of water pollution or any significant impacts on water resources. Aspects of the Project will have benefits for water quality and resources and should be afforded positive weight in the overall planning balance.

8.14 Historic Environment

Policy Context

8.14.1 Paragraph 5.193 of the ANPS requires ESs to provide a description of the significance of the heritage asset affected by the proposed development, and the contribution of their setting to that significance. The ANPS advises that the level of detail should be proportionate to the asset's importance, and no more than is sufficient to understand the potential impact of the proposal on the significance of the asset.

8.14.2 Where development includes or has the potential to include heritage assets with archaeological interest, paragraph 5.193 of the ANPS requires an appropriate desk-based assessment including, where necessary, a field evaluation. An assessment of the extent of the impact of a development on the significance of any heritage asset needs to be adequately understood.

8.14.3 Paragraph 5.194 requires detailed studies for heritage assets affected by noise, light and indirect impacts based upon the guidance provided in The Setting of Heritage Assets and the Aviation Noise Metric. Furthermore, where proposed development will affect the setting of a heritage asset, accurate representative visualisations may also be necessary to assess the impact.

8.14.4 Paragraph 195 of the ANPS encourages applicants to ensure proposals can make a positive contribution to the historic environment. This requires consideration of the of the significance of heritage assets affected including; enhancing, through a range of measures such as sensitive design, the significance of heritage assets or setting affected; considering measures that address those heritage assets that are at risk, or which may become at risk, as a result of the scheme; and considering how visual or noise impacts can affect heritage assets, and whether there may be opportunities to enhance access to or interpretation, understanding and appreciation of the heritage assets affected by the scheme.

8.14.5 Paragraph 195 also advises that careful consideration will be required as to whether the impacts on the historic environment will be direct or indirect, temporary or permanent (paragraph 195).

8.14.6 Paragraph 5.198 of the ANPS states that in decision making, "the SoS will take into account the particular nature of the significance of the heritage asset and the value that they hold for this and future generations. This understanding should be used to avoid or minimise conflict between their conservation and any aspect of the proposal."

8.14.7 Where developments lead to less than substantial harm to the significance of a designated heritage asset, paragraph 5.205 of the ANPS states that this harm should be weighed

against the public benefits of the proposal.

8.14.8 Paragraph 5.208 advises applicants to ‘look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance and better reveal their significance’.

8.14.9 The requirements in the NNNPS relating to the historic environment (paragraphs 5.120 to 5.142) are largely comparable to those as set out in the ANPS.

8.14.10 Section 16 of the NPPF sets out relevant planning policies relating to the historic environment (paragraphs 189 to 208). The NPPF sets out the importance of assessing the significance of heritage assets that may be affected by development.

8.14.11 Paragraph 194 of the NPPF requires applicants to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance to understand the potential impact of the proposal on their significance.

8.14.12 The NPPF provides a range of definitions at Annex 2 relating to the historic environment including; heritage asset, designated heritage asset, setting of a heritage asset and significance (for heritage policy).

8.14.13 Significance is defined as the ‘value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic’. Significance is not only derived from an asset's physical presence, but also from its setting.

8.14.14 The setting of a heritage asset is defined by the NPPF as ”the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve”.

8.14.15 Paragraphs 199 to 203 of the NPPF state that heritage assets can be harmed or lost through alteration, destruction or development within their setting. This harm ranges from less than substantial through to substantial.

8.14.16 Paragraph 201 states that where development would lead to substantial harm to (or total loss of significance of) a designated heritage asset, consent should be refused unless it can be demonstrated that it is necessary to achieve substantial public benefits that outweigh that harm or loss.

8.14.17 Where development leads to ‘less than substantial harm’ to the significance of a designated heritage asset, the harm should be weighed against the public benefits of the proposal (paragraph 202 of the NPPF refers).

Assessment

8.14.18 **ES Chapter 7: Historic Environment** (Doc Ref. 5.1) provides an assessment of the Project in terms of the historic environment. This includes historic buildings and areas, historic landscape character and buried archaeological remains. Such effects could be in the form of a direct physical impact leading to loss of, or damage to, the heritage asset, or harm to the significance of the asset resulting from change within its setting.

8.14.19 The **effects** of the Project that may affect the historic environment are also assessed in other **ES** chapters including those relating to landscape, ecology, traffic, noise (air and ground

noise) and water.

8.14.20 **Effects** on the historic landscape are considered in **ES Chapter 7: Historic Environment**, whilst effects on landscape character and visual amenity are considered in **ES Chapter 8: Landscape, Townscape and Visual Resources**. The environmental effects of traffic and noise (ground and air noise) are considered in **ES Chapter 12: Traffic and Transport** and **ES Chapter 14: Noise and Vibration** respectively (all Doc Ref. 5.1).

8.14.21 Similarly, the effects of environmental mitigation on heritage assets and buried archaeological remains are also considered as part of the assessment covering the design of ecological, landscape and flood risk mitigation within **ES Chapter 8: Landscape, Townscape and Visual Resources**, **ES Chapter 9: Ecology and Nature Conservation**, and **ES Chapter 11: Water Environment** (all Doc Ref. 5.1).

8.14.22 The assessment of the Project upon the historic environment has been informed, consistent with the policy requirements described above, by a number of studies appended to the **ES** (all Doc Ref. 5.3) including:

- Appendix 7.6.1: Historic Environment Baseline Report
- Appendix 7.6.2: Archaeological Evaluation Report: Land Associated with the Gatwick Airport Northern Runway Scheme
- Appendix 7.6.3: Archaeological Evaluation Report: Land Associated with the Gatwick Airport Northern Runway Scheme (Phase 2: Longbridge Roundabout and Reigate Field)
- Appendix 7.6.4: Geotechnical Data Reviewed for Mapping of Archaeological Potential.

8.14.23 Table **7.4.1** in **ES Chapter 7** summarises the potential effects of the Project in relation to the historic environment. The effects are assessed in relation to the construction (including demolition) and the operation phases. These are summarised as follows:

Activity	Potential Effects
Construction Period (including Demolition): Buried Archaeology	
Construction and demolition activities (generally)	Loss of, or damage to, heritage assets as a result of construction activity (eg physical removal or disturbance of archaeological remains, where these are still present).
Construction of updated highways junctions	Loss of, or damage to, heritage assets as a result of construction of upgraded highway junctions (eg physical removal, disturbance, damage of potential archaeological remains).

Use of construction compounds and creation of mitigation areas beyond existing airport boundary	Loss of, or damage to, heritage assets as a result of instigation and use of construction compounds and creation of environmental mitigation/enhancement areas beyond the existing airport boundary. This includes works associated with drainage, such as excavation for new ponds or ground reduction for flood alleviation. Works to prepare the proposed construction compounds may result in loss of or damage to heritage assets. However, the site of the proposed main contractor compound is already developed (predominantly for surface parking), whilst the site of the proposed airfield satellite compound has been subject to previous archaeological examination as part of the Gatwick North West Zone development.
Construction Period (including Demolition): Built Heritage and Historic Areas	
Construction and demolition activities	Effects resulting from changes within the settings of designated and non-designated heritage assets as a result of demolition and construction activity (including light and noise), construction of upgraded highway junctions and use of construction compounds. Effects resulting from demolition of non-designated buildings with identified heritage values.
Construction Period (including Demolition): Historic Landscape	
Construction and demolition activities	Effects on the wider historic landscape as a result of construction activity, including construction of upgraded highway junctions, establishment and use of construction compounds and creation of mitigation/enhancement areas.
Operational Period: Built Heritage and Historic Areas	
Use of airport, including upgraded highway junctions	Effects resulting from changes within the settings of designated and non-designated heritage assets as a result of operational activity (including light and noise). This includes consideration of potential air noise impacts that may occur as a result of increased flight numbers and/or changes in distribution of volumes of aircraft along established flight paths, as well as ground noise and road traffic noise.
Operational Period: Historic Landscape	
Use of airport, including upgraded highway junctions	Effects on the wider historic landscape.

8.14.24 A detailed description of the historic environment baseline is presented within **Appendix 7.6.1** of the **ES**.

8.14.25 The current airport was developed within a historic landscape comprising dispersed farmsteads with small, irregular fields bounded by hedges that were often heavily wooded. In contrast, the land within the Project site boundary is predominantly occupied by the operational airport within which very little remains of the preceding historic landscape.

8.14.26 There is one Conservation Area partially within the Project site boundary (Church Road (Horley) Conservation Area, on the south western edge of Horley) with three further Conservation Areas wholly or partially within 1 km of the Project site boundary.

8.14.27 The eastern part of the Church Road (Horley) Conservation Area comprises a number of historic buildings including the Grade I listed Church of St Bartholomew and the adjacent Grade II listed Ye Olde Six Bells public house.

8.14.28 Within 1 km of the Project site boundary there are a considerable number of designated heritage assets. These include two Scheduled Monuments, three Grade I listed churches and eight Grade II* listed buildings.

8.14.29 There are approximately 135 Grade II listed buildings or structures within 3 km of the Project site boundary. Many of these are located within the historic village of Charlwood to the west of the airport and within Horley to the north, whereas others are dispersed farmsteads and cottages in a more rural setting.

8.14.30 Archaeological fieldwork has been undertaken at several locations within the Project site boundary. A comprehensive programme of archaeological investigation was previously undertaken in the north western part of the airport (known as the Gatwick North West Zone) over the period 1998–2001 which resulted in the identification of the remains of settlement activity dating from the Late Bronze Age. Other notable programmes of archaeological work were undertaken in 2012-13. There are a number of identified archaeological areas within the local area. A detailed examination of known archaeological sites within and adjacent to the Project site boundary is presented within **ES Appendix 7.6.1 Historic Environment Baseline Report** (Doc Ref. 5.3)**.**

8.14.31 The mitigation measures to be adopted as part of the Project are provided in **Table 7.8.1** in **ES Chapter 7**. A **Code of Construction Practice (ES Appendix 5.3.2)** and **Outline Landscape and Ecology Management Plan** (**ES Appendix 8.8.1)** (Doc Ref. 5.3) will be secured through requirements attached to the DCO, providing mitigation which includes:

- vegetation retention strategy
- proposed woodland and tree planting
- proposed earth shaping, embankments, cuttings or bunds
- proposed fences, walls or barriers
- measures designed to reduced noise

8.14.32 In addition the proposed design for the environmental mitigation land at Longbridge Roundabout includes the potential for enhancement of the Church Road (Horley) Conservation Area. This includes the extension of public access to land within and adjacent to the Conservation Area.

8.14.33 The assessment of the Project has considered potential impacts on the historic environment

(including conservation areas, listed buildings and archaeology) for the initial construction period 2024-2029, 2030-2032 (which would include much of the highways improvements and the first full year of opening), 2033-2038 and the design years 2038 and 2047. The significance of effects is summarised within **Table 7.13.1** in **ES Chapter 7** (Doc Ref. 5.1).

8.14.34 Effects range from negligible temporary effects (due to construction activities) to up to major adverse effects (both temporary and permanent). Many of the identified major effects arise in relation to archaeological remains. Such effects are proposed to be offset through a programme of archaeological investigation. In the case of land required for environmental mitigation at Museum Field and Brook Farm there is the potential for a programme of appropriate mitigation during detailed design to reduce the magnitude of the impact and the significance of the effect. Similarly, in relation to the car park B contractor compound and subsequent environmental mitigation appropriate mitigation may be implemented ahead of the proposed works that may reduce the magnitude of the impact.

8.14.35 Major adverse effects also arise from the Project in relation to the Church Road (Horley) Conservation Area due to the Longbridge Roundabout improvement works. The effect would reduce over time as new local planting reaches maturity.

Planning Policy Compliance

8.14.36 The assessment of effects of the Project on the historic environment exclude, as per the **Scoping Opinion (ES Appendix 6.2.2)** (Doc Ref. 5.3), consideration of operational impacts on buried archaeological remains, and impacts on designated heritage assets within the more urbanised areas of Horley and Crawley resulting from changes within their settings.

8.14.37 A number of mitigation measures embedded as part of the Project and within the **Code of Construction Practice** (provided at **ES Appendix 5.3.2)** and the **Outline Landscape and Ecology Management Plan (ES Appendix 8.8.1)** will ensure that will ensure the effects of the Project during the construction period are minimised and temporary.

8.14.38 In accordance with the requirements of paragraph 5.193 of the ANPS and paragraph 5.126 of the NNNPS the application for the DCO is supported by a description of the significance of the assets affected by the Project including a desk based assessment and field evaluation. Furthermore, impacts have been assessed in accordance with the considerations set out within paragraph 5.194 of the ANPS and paragraph 5.127 of the NNNPS.

8.14.39 In compliance with the requirements of paragraph 5.194 of the ANPS of the NNNPS, no situations have been identified in which a visualisation has been considered necessary for the assessment of likely impacts and effects resulting from changes within the settings of heritage assets. Visualisations prepared as part of the **ES Chapter 8: Landscape, Townscape and Visual Resources** (Doc Ref. 5.1) have been reviewed as part of the assessment of the Project on the historic environment.

8.14.40 Consistent with the requirement set out at paragraph 5.195 and 5.208 of the ANPS (and paragraph 5.137 of the NNNPS), consideration has been given to identify opportunities for enhancing the significance of heritage assets.

8.14.41 The Project also accords with the policies set out at paragraphs 199 to 203 of the NPPF. As the NPPF recognised, the assessment of harm to designated heritage assets need to be weighed against the public benefits of the Project.

8.15 Landscape, Townscape and Visual Resources (Visual Impacts)

Policy Context

8.15.1 The ANPS sets out policy relating to landscape and visual impacts at paragraphs 5.213 to 5.225 including considerations on nationally designated areas and other areas.

8.15.2 Paragraph 5.213 of the ANPS states 'For airport development, landscape and visual effects also include tranquillity effects, which would affect people's enjoyment of the natural environment and recreational facilities. In this context, references to landscape should be taken as covering local landscape, waterscape and townscape character and quality, where appropriate'.

8.15.3 Paragraph 5.214 requires landscape and visual assessments to reference any landscape character assessment and associated studies as a means of assessing landscape impacts relevant to the preferred scheme. Assessments should consider both the construction and operation of proposed schemes and also take account of any relevant policies set out within the development plan. Paragraph 5.215 also requires the assessment to including 'surface access proposals', 'aviation activity' and 'landscape character, including historic characterisation'. Furthermore, 'noise and light pollution effects, including on local amenity, tranquillity and nature conservation' should also be included (paragraph 5.216).

8.15.4 The ANPS confirms that adverse landscape and visual mitigation measures may be minimised through appropriate design and landscape schemes (paragraph 5.217).

8.15.5 Paragraph 5.222 emphasises a duty to have regard to the purposes of nationally designated areas when considering projects that fall outside the boundaries of these areas which may have impacts within them.

8.15.6 Landscapes and townscapes that are highly valued locally should also be given consideration where the development plan has policies based on landscape character assessments (paragraphs 5.223 to 5.224 of the ANPS refer).

8.15.7 The requirements in the NNNPS relating to landscape and visual impacts (paragraphs 5.143 to 5.161) are largely comparable to those as set out in the ANPS.

8.15.8 The NPPF sets out an environmental objective 'to protect and enhance our natural, built and historic environment' (paragraph 8). Planning policy relating to landscape, townscape and visual resources is included within several sections of the NPPF including; section 3 (plan making); section 6 (building a strong, competitive economy); section 8 (promoting healthy and safe communities; section 9 (promoting sustainable transport); section 11 (making effective use of land); section 12 (achieving well designed places); and section 15 (conserving and enhancing the natural environment).

8.15.9 Strategic policies relating to plan-making set a requirement for sufficient provision for 'conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure and planning measures to address climate change mitigation and adaption' (paragraph 20 of the NPPF).

8.15.10 In relation to the Project boundary, section 6 of the NPPF recognises that sites may have to be found adjacent to or beyond existing settlements or urban areas. In these circumstances, development 'is sensitive to its surroundings'.

8.15.11 Paragraph 92 of the NPPF states that development should 'enable and support healthy lifestyles,…. for example through the provision of safe and accessible green infrastructure… and layouts that encourage walking and cycling'.

8.15.12 The NPPF states at paragraph 99 that existing open space should not be built on unless the loss resulting from the proposed development could be replaced by equivalent or better provision in terms of quality and quantity in a suitable location. Similarly, paragraph 100 affords protection to and opportunities for the enhancement of existing public rights.

8.15.13 In relation to the promotion of sustainable transport, paragraph 104 of the NPPF requires the environmental impacts of traffic and transport infrastructure to be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains. Paragraph 112 states that development proposals should 'respond to local character and design standards'.

8.15.14 Section 11 of the NPPF concerns 'making effective use of land' and recognises the need to safeguard and improve the environment when meeting the needs for development. Paragraph 120 promotes new habitat creation or the improvement of public access to the countryside. Paragraph 124 recognises the 'desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change' and 'the importance of securing well-designed, attractive and healthy places'.

8.15.15 NPPF includes general policies regarding achieving high quality and inclusive design for all development (paragraph 130). This is required to ensure that developments will function well and add to the overall quality of the area, establish a strong sense of place and create an attractive and comfortable place to live, work and visit. Proposals are also required to optimise the potential of the site to accommodate development and respond to the local character and history and reflect the identity of the surrounding built environment and landscape setting. New development should also create safe and accessible environments that are visually attractive with appropriate and effective landscaping.

8.15.16 Paragraph 174 of the NPPF states that 'Planning policies and decisions should contribute to and enhance the natural and local environment by; protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)' and by 'recognising the intrinsic character and beauty of the countryside' including the benefits of trees and woodland.

8.15.17 Paragraph 176 confirms that 'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues'.

8.15.18 Paragraph 185 of the NPPF requires that new development is appropriate to its location and should 'identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason', and that the impact on local amenity of light pollution from artificial light is limited within intrinsically dark landscapes.

Assessment

8.15.19 **ES Chapter 8: Landscape, Townscape and Visual Resources** (Doc Ref. 5.1) provides an

assessment of the Project in terms of landscape, townscape and visual resources. This includes identification of the character and features of the landscape and townscape (urban areas) and consideration of the changes that would result as a consequence of the Project.

8.15.20 The effects of the Project that affect the landscape, townscape and visual resources are also assessed in other chapters of the **ES**. In relation to character this includes land that contains heritage and ecological assets. Effects on heritage assets and their context and settings are considered within **ES Chapter 7: Historic Environment** and the effects on flora and fauna within habitats is considered within **ES Chapter 9: Ecology and Nature Conservation** (Doc Ref. 5.1). The assessment of effects on visual receptors includes people using recreational assets, effects on public open space and public rights of way which are considered within **ES Chapter 19: Agricultural Land Use and Recreation** (Doc Ref. 5.1). The assessment of effects on landscape character and visual resources includes the influence of overflying aircraft on people's perception of tranquillity within the landscape, the effects of aircraft noise on people are considered within **ES Chapter 14: Noise and Vibration** (Doc Ref. 5.1).

8.15.21 The principal objectives of the assessment are:

- to describe, classify and evaluate the existing landscape and townscape likely to be affected by the Project during its construction and operational phases;
- to identify visual receptors with views of the Project; and
- to identify the likely significant effects on landscape, townscape and views, considering measures proposed to reduce or avoid any effects identified.

8.15.22 The assessment of landscape, townscape and visual resources set out within the **ES** is informed by a range of reports. The landscape proposals are defined in the **Outline Landscape and Ecology Management Plan (OLEMP)** at **ES Appendix 8.8.1** (Doc Ref. 5.3). The OLEMP includes landscape concept proposals for new public open spaces comprising land east of Museum Field in combination with the flood compensation area, land north of Longbridge Roundabout linked to existing open space at Church Meadows and two areas of land at existing staff car park B redeveloped as areas of replacement open space linked to Riverside Garden Park.

8.15.23 Landscape planting proposals have also been developed for the surface access improvements at South Terminal roundabout, North Terminal roundabout and Longbridge roundabout **(ES Appendix 8.8.1 Figures 1.2.4 to 1.2.15)** (Doc Ref. 5.2). The proposals seek to reinstate predominantly native woodland and scrub vegetation that would need to be removed to undertake the highway improvements. Further concept landscape proposals have been developed for land at Pentagon Field and are included in the OLEMP.

8.15.24 The OLEMP incorporates combined strategies for landscape and ecology. It outlines the various existing landscape zones and elements and the key landscape proposals which would be created as part of the Project and puts forward the necessary actions required for their ongoing maintenance and management.

8.15.25 Wireline photomontages have been prepared for all representative views described and assessed within the Landscape and Townscape Visual Impact Assessment (LTVIA) (ES Figures 8.9.1 to 8.9.128) (Doc Ref. 5.2). The montages illustrate the scale, massing and location of the main elements of the Project and temporary construction compounds, within a range of near, mid-distance and distant views towards the Project.

8.15.26 Table **8.4.1** in **ES Chapter 8** summarises the potential effects of the Project on landscape, townscape and visual resources which have been considered in the assessment based on the construction phase (including demolition) and the operational phase. These are as follows:

Activity	Potential Effects
Construction Phase (including Demolition): Landscape/Townscape Characters	
Construction and demolition activities (generally)	Change in character (to landscape designations/types/areas) as a result of construction activity (including lighting).
Construction of updated highways junctions	Change in character (to landscape designations/types/areas, specifically Riverside Garden Park) as a result of construction of upgraded highway junctions (including lighting).
Use of construction compounds and creation of mitigation areas	Change in character (to landscape designations/types/areas) as a result of use of construction compounds and creation of mitigation/enhancement areas (including lighting) beyond the existing airport boundary. Specifically, effects of new attenuation ponds/flood compensation areas excavation/River Mole floodplain and Museum Field/Brook Farm and Longbridge Roundabout/Church Meadows.
Construction Phase (including Demolition): Visual Effects	
Construction and demolition activities	Effects on views as a result of demolition and construction activity (including lighting). Scope of assessment focuses on the following elements of the Project that have some potential to result in significant effects on visual resources: construction of upgraded highway junctions, new hotels, office block and multi-storey car parks at South Terminal, attenuation ponds and use of construction compounds.
Operational Phase: Landscape/Townscape Character	
Use of airport, including upgraded highway junctions	Change in character as a result of operational activity (including perception of tranquillity). Scope of assessment focuses on the following elements of the Project that have some potential to result in significant effects on landscape/townscape: extension to North and South Terminals, new hotels, new office block, multi-storey and decked car parks, surface access improvements, attenuation ponds/River Mole floodplain and lighting.
Operational Phase: Visual Effects	

Use of airport, including upgraded highway junctions	Effects on views as a result of airport and operational activities and moving and stationary aircraft (including effects on perception of tranquillity). Includes consideration of day time and night time effects. Scope of assessment focuses on the following elements of the Project that have some potential to result in significant effects on visual resources: extension to North and South Terminals, new hotels, new office block, multi-storey and decked car parks, surface access improvements, attenuation ponds/River Mole floodplain, and lighting.

8.15.27 Gatwick Airport and its immediate landscape context are located within the Low Weald National Character Area 121, as defined in Natural England's National Character Area (NCA). Other character areas within the wider study area include High Weald NCA 122, Wealden Greensand NCA 120 and North Downs NCA 119.

8.15.28 The Project is located outside of any designated Area of Outstanding Natural Beauty (AONB) or National Park. There are three AONBs and a National Park within the wider study area comprising:

- High Weald AONB;
- Surrey Hills AONB;
- Kent Downs AONB; and
- South Downs National Park

8.15.29 The landscapes within these designated areas are relevant to the assessment of the influence of overflying aircraft on the perception of tranquillity.

8.15.30 The three AONBs are subject to Management Plans whereas the National Park is subject to a Local Plan which prescribes policies for its conservation and enhancement of the natural beauty, wildlife and cultural heritage.

8.15.31 The local settlements of Crawley, Horley, Charlwood and Hookwood have been identified as townscape character areas and are subject to assessment within the ES.

8.15.32 Site surveys have identified a range of visual receptors predominantly within a defined 5km radius study area.

8.15.33 The mitigation measures to be adopted as part of the Project are provided in **Table 8.8.1** in **ES Chapter 8**.This mitigation will be mostly secured via the **Outline Landscape and Environmental Management Plan (ES Appendix 8.8.1)** but also via the **Public Rights of Way Management Strategy (ES Appendix 19.8.2)** and the **Operational Lighting Framework (ES Appendix 5.2.2)** (Doc Ref. 5.3) where appropriate. The mitigation measures include:

- vegetation retention measures
- proposed public open space and footpaths
- proposed woodland, tree, scrub, shrub, wetland amenity and grassland planting
- proposed earth shaping, embankments, cuttings or bunds
- proposed fences, walls or barriers
- proposed hard landscaping

- management of, or implementation of, proposed mitigation to enhance existing green infrastructure including hedgerows, woodland, trees, shrubs, wetland and amenity planting
- lighting

8.15.34 The assessment has considered potential impacts on landscape and townscape character, visual amenity, tranquillity within nationally designated landscapes for the initial construction period 2024-2029, 2030-2032 (which would include much of the highways improvements and the first full year of opening in 2029), 2033-2038 and the design years 2038 and 2047. The significance of effects is summarised within **Table 8.13.1** in **ES Chapter 8**.

8.15.35 Due to the largely urban character of the airport within the Project site, its redevelopment would result in the removal of a limited number of important landscape or townscape features. New buildings and infrastructure would form some intensification of the existing character of the airport and neighbouring settlements of Crawley and Horley. In terms of landscape, effects would be very limited. Significant adverse effects on surrounding landscape character areas within the study area are unlikely as the airport context would remain largely similar and screening provided by existing vegetation, built development and earth mounds would remain or would be replaced as part of the Project.

8.15.36 There are likely to be very few people who would experience significant adverse effects as a result of the Project. During construction some temporary significant effects on views are possible but these will be localised, in the short term and before mitigation planting is mature. The activities and developments may be barely perceptible when seen at distance, or prominent and at times dominant when in close proximity. This would result in effects that generally, would not be significant, due to the established airport development.

8.15.37 The change to the existing level of tranquillity within the nationally designated landscapes within the study area would not be significant as the increase in aircraft numbers may be discernible to some people or barely perceptible to others, compared to existing conditions. No change in flight paths or airspace is required for the Project.

8.15.38 Taking into account the mitigation measures described above, the following significant effects are likely to occur with respect to landscape, townscape and visual resources:

- Temporary and permanent adverse effects on the local landscape character of Mole Valley Open Weald arising from construction and operation of the Project.
- Temporary and permanent adverse effects on the views experienced by occupiers of Hilton Hotel arising from construction and operation of the Project.
- Temporary adverse effects on the local views experienced by users of public open space at Riverside Garden Park and Church Meadows Horley arising from construction of the Project.
- Temporary and permanent adverse effects on the views experienced by occupiers of number 74 Longbridge Road Horley arising from construction and operation of the Project.

Planning Policy Compliance

8.15.39 As agreed within the **Scoping Opinion (ES Appendix 6.2.2)** (Doc Ref. 5.3) the effects of the Project on seascape character, effects which may arise as a result of the reconfiguration of internal spaces within existing buildings and structures and effects on the perception of

tranquillity within national designated landscapes as a result of over flying aircraft greater than 7,000 feet above local ground level have been scoped-out of the assessment.

8.15.40 A number of mitigation measures embedded within the Project as part of the **Outline Landscape and Ecology Management Plan** include to retain and enhance vegetation, create public open space and footpaths and create areas for landscape planting that will ensure that there is no increased potential for impacts on landscape and townscape in accordance with the policies of the ANPS. In particular, the Project has been assessed in accordance with the requirements of paragraphs 5.214 to 5.216 of the ANPS and includes appropriate illustrative design and landscape mitigation measures in accordance with paragraph 5.217. The Project also accords with the policies set out at paragraphs 5.143 to 5.161 of the NNNPS.

8.15.41 Whilst significant effects are likely to occur, once mitigation planting especially has matured, the Project will contribute to and enhance the natural and local environment in accordance with paragraph 174 of the NPPF.

8.15.42 The Project has been assessed as being in accordance with relevant policies which concern landscape, townscape and visual resources and should be afforded limited negative weight in the planning balance.

8.16 Geology and Ground Conditions

Policy Context

8.16.1 In terms of geology, paragraph 5.84 of the ANPS relates to the need to geologically conserve sites that are designated for their geology and/or geomorphological importance. Paragraph 5.89 states that an Applicant should ensure that the ES submitted with its application for development consent clearly sets out any likely significant effects on internationally, nationally and locally designated sites of geological importance. Paragraph 5.91 states that the Applicant should show how the project has taken advantage of and maximised opportunities to conserve geological conservation interests. Paragraph 5.96 of the ANPS states that as a general principle, development should avoid significant harm to geological conservation interests, including through mitigation and consideration of reasonable alternatives. Where significant harm cannot be avoided or mitigated, paragraph 5.96 states as a last resort, appropriate compensation measures should be sought but that the development consent order, or any associated planning obligations, will need to make provision for the long-term management of such measures. Paragraph 5.97 states that in taking decisions, the SoS will ensure that appropriate weight is attached to geological interests in the wider environment. These provisions are broadly repeated in paragraphs 5.20 to 5.38 of the NNNPS. Paragraph 5.31 of the NNNPS states that sites of regional and local geological interest (which include Local Geological Sites) should be given due consideration by the SoS. However, given the need for new infrastructure, these designations should not be used in themselves to refuse development consent. Paragraph 174 of the NPPF states that planning decisions should contribute to and enhance the natural and local environment by protecting and enhancing sites of geological value.

8.16.2 On land stability, paragraph 5.226 of the ANPS recognises that the effects of land instability may result in landslides, subsidence or ground heave. Failing to deal with this issue could

cause harm to human health, local property and associated infrastructure, and the wider environment. Paragraph 5.227 states that where necessary, land stability should be considered in respect of new development, as set out in the NPPF. Specifically, proposals should be appropriate for the location, including preventing unacceptable risks from land instability. Parargraph 5.228 requires that a preliminary assessment of ground instability should be carried out at the earliest possible stage before a detailed application for development consent is prepared and that the Applicant should ensure that any necessary investigations are undertaken to confirm that their sites are and will remain stable, or can be made so as part of the development. These requirements are broadly repeated in paragraphs 5.116 to 5.119 in the NNNPS. The NPPF states in paragraph 183 that planning decisions should ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. Paragraph 184 of the NPPF confirms that where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.

8.16.3 In terms of contamination, paragraph 5.116 of the ANPS states that for developments where land may be affected by contamination, or existing mitigation is in place in respect of historical contamination, the Applicant should have regard to the statutory regime contained in Part IIA of the Environmental Protection Act 1990 and relevant Government guidance relating to or dealing with contaminated land. Paragraph 5.110 recognises that the construction and operation of airport facilities is a potential source of contaminative substances (for example, through de-icing or leaks and spills of fuel). Where pre-existing land contamination is being considered through development, the objective is to ensure that the site is suitable for its intended use. Risks would require consideration in accordance with the contaminated land statutory guidance as a minimum. Paragraph 5.125 of the ANPS states that the SoS will also have regard to the effect of the development upon and resulting from existing land contamination, as well as the mitigation proposed. Paragraph 5.168 of the NNNPS states that for developments on previously developed land, Applicants should ensure that they have considered the risk posed by land contamination and how it is proposed to address this. Paragraph 183 and 184 of the NPPF also apply (see above).

8.16.4 With regards to minerals, paragraph 5.117 of the ANPS states that the Applicant should safeguard any mineral resources on the proposed site for the preferred scheme as far as possible. Paragraph 5.121 states that where the preferred scheme has an impact on a mineral safeguarding area, the SoS must ensure that the Applicant has put forward appropriate mitigation measures to safeguard mineral resources. These policy requirements are broadly repeated in paragraphs 5.169 and 5.182 of the NNNPS. Paragraph 210(c) of the NPPF states that appropriate planning policies should be adopted so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development where this should be avoided. Guidance in the West Sussex Joint Minerals Local Plan (West Sussex County Council and South Downs National Park Authority, 2018) indicates that non-mineral development within a mineral safeguarded area should not be permitted unless mineral sterilisation will not occur; it is appropriate to extract the mineral prior to the development taking place; or the overriding need for the development outweighs the safeguarding of the mineral and it has been demonstrated that prior extraction is not practicable or environmentally feasible.

8.16.5 In terms of groundwater quality, the ANPS recognises at paragraph 5.174 that development may result in an increased potential for impacts on the water environment, especially the quality of the surface and groundwater through the discharge of waters contaminated with de-icer along with hydrocarbons and other pollutants. Paragraph 5.175 further states that where the proposed development is subject to an Environmental Impact Assessment and the development is likely to have significant adverse effects on the water environment, the Applicant should ascertain the existing status of, and carry out an assessment of, the impacts of the proposed project on water quality. Paragraph 5.181 in the ANPS acknowledges that the risk of impacts on the water environment can be reduced through careful design to adhere to good pollution practice. Paragraph 5.182 of the ANPS recognises that activities that discharge to the water environment are subject to pollution control, and the considerations set out at paragraphs 4.53-4.59 of the ANPS covering the interface between planning and environmental permitting therefore apply. Paragraph 5.183 of the ANPS states that the SoS will generally need to give more weight to impacts on the water environment where a project would have adverse effects on the achievement of the environmental objectives established under the Water Framework Directive. Paragraph 5.186 of the ANPS states that the SoS will need to consider proposals put forward by the Applicant to mitigate adverse effects on the water environment. It further states that if the Environment Agency continues to have concerns, and objects to the grant of development consent on the grounds of impacts on water quality/resources, the SoS can grant consent, but will need to be satisfied that all reasonable steps have been taken by the Applicant and the Environment Agency to try to resolve the concerns. The provisions set out in the ANPS are largely replicated in the NNNPS in paragraphs 5.219 to 5.231. Paragraph 174(e) of the NPPF states that planning decisions should contribute to and enhance the natural and local environment by preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of water pollution. It further states that development should, wherever possible, help to improve local environmental conditions such as water quality.

Assessment

8.16.6 **ES Chapter 10: Geology and Ground Conditions** (Doc Ref. 5.1) provides an assessment of the NRP on geology and ground conditions. It covers land and groundwater quality, land instability and mineral resources.

8.16.7 The assessment includes an evaluation of ground conditions and the nature of any potential contamination present. Part of the assessment includes a review of existing ground investigation data pertaining to the NRP site. A desk based **Preliminary Risk Assessment (ES Appendix 10.9.1)** (Doc Ref. 5.3) has been undertaken which informs the assessment. As part of the **Preliminary Risk Assessment**, an outline conceptual site model for the NRP site as a whole has been developed to identify potential source-pathway-receptor pollutant linkages on the basis of the site reconnaissance and desk study. This model has been considered within the context of any pre-existing site investigation data and the proposal for each element of the Project. Where the model identifies a potential for significant harm to sensitive receptors through active pollutant linkages, further investigation or more detailed risk assessment may be required or, if residual risk remains, remediation or mitigation measures may be appropriate. Where ground investigations are required, and in the event

that they determine that remediation is required, this will secured through a requirement for contamination management in the **draft DCO** (Doc Ref. 2.1).

8.16.8 A **Minerals Resource Assessment** has been undertaken following consultation with West Sussex County Council and Surrey County Council (as the minerals planning authorities) to explain how the NRP has addressed the minerals safeguarding policies. The minerals resource assessment is provided within **ES Appendix 10.9.2.**

8.16.9 **Table 10.4.1** in **ES Chapter 10** summarises the potential effects of the Project on geology and ground conditions which have been considered in the assessment based on the construction phase (including demolition) and the operational phase. These are as follows:

Activity	Potential Effects
Construction Phase (including Demolition): Geology and Ground Conditions	
Construction and demolition activities	Runoff from construction areas to soils (and subsequent leaching into groundwater, including effects on any public water supplies if present). Contamination risk to construction workers, including dermal contact and ingestion; or inhalation of any accumulated ground gases. Contamination risk to public, eg airborne migration and subsequent dermal contact and ingestion.
Construction of highways improvements	Runoff from construction areas to soils and subsequent leaching into groundwater, including effects on any public water supplies if present. Contamination risk to construction workers including dermal contact and ingestion; or inhalation of accumulated ground gases. Contamination risk to public, eg airborne migration and subsequent dermal contact and ingestion.
Use of construction compounds and creation of mitigation areas	Runoff from construction areas to soils and subsequent leaching into groundwater, including effects on any public water supplies if present. Contamination risk to construction workers including dermal contact and ingestion; or inhalation of accumulated ground gases. Contamination risk to public eg airborne migration and subsequent dermal contact and ingestion. Loss of mineral resources.
Operational Phase: Geology and Ground Conditions	
Use of airport, including highways improvements	Contamination risk from spillages during re-fueling operations/fuel storage leakage/spills etc. Contamination risk to airport workers. Contamination risk to public and local public water supply.

8.16.10 No geological Sites of Special Scientific Interest (SSSIs) or Local Geological Sites (LGSs) are located within 500 metres of the NRP site boundary. Effects on designated geological sites is therefore scoped-out of the assessment.

8.16.11 A number of secondary aquifers are located beneath the Project site. The study area is located within a surface water Nitrate Vulnerable Zone (NVZ) and a surface water Safeguard

Zone (SgZ). An NVZ is an area of land draining into water known to be polluted by nitrates. A SgZ is an area that influences the water quality at water abstraction sites at risk of failing the drinking water protection objectives. There are no surface water or potable water abstraction licences within the study area.

8.16.12 The NRP site falls within the Brick Clay Resource Mineral Safeguarding Area within West Sussex. The mineral resource covers more than one third of the total county area. The Project site also falls within the Brick Clay Resource Consultation Area as shown in the Minerals and Waste Safeguarding Guidance (West Sussex County Council and South Downs National Park Authority, 2020). Unlike West Sussex County Council, the Mineral Planning Authority (MPA) for Surrey County Council (SCC) does not designate the entire exposure of the Weald Clay Formation as the Mineral Safeguarding Area for Brick Clay. The MPA for SCC has instead designated smaller MSAs typically around sites of current or historical mineral extraction. None of the Project site that extends into the administrative area of SCC is situated near (or on) designated MSAs in the SCC administrative area. The excavation of soil from the areas to be used for water/flood storage may lead to a loss of mineral resources from the Brick Clay Resource Mineral Safeguarded Area. This is considered to be a very small proportion of the total Mineral Safeguarding Area for brick clay, which extends across much of the north and east of the county. Opportunities to use the excavated material as a mineral are to be explored and where this is achieved this would further mitigate the impact. Consequently, the effects would not be significant.

8.16.13 In terms of ground stability, the NRP site is indicated to have potential for small scale underground mining in relation to iron ore. Areas at moderate risk for compressibility are present across the site. A moderate risk of slope instability has been identified for a small area along the A23 embankment.

8.16.14 In terms of ground conditions, a number of previous ground investigations and assessments have been undertaken across the NRP site. A summary of the reports available is provided in **ES Appendix 10.9.1.** Contaminants of concern within soils did not exceed the assessment criteria. Exceedances of assessment criteria for a number of contaminants of concern (including heavy metals, hydrocarbons and VOCs) have been identified within perched/groundwaters. Additionally, leachable concentrations of heavy metals and hydrocarbons were identified. It is considered that the exceedances for hydrocarbons were generally confined to the Made Ground and were located close to the boundary of the Made Ground/underlying clay interface. The results of the leachate analysis suggest that the general quality of Made Ground identified on the NRP site may represent a moderate risk with regards to generation of low-quality perched groundwater.

8.16.15 Much of the NRP site is covered by buildings and hard surfacing, which reduces the number of potential pathways to receptors. There are currently no known active pollutant linkages whilst the NRP site remains in its current baseline condition and operates in accordance with existing procedures. However, a number of potential pollutant linkages may become active where areas are proposed for development

8.16.16 The mitigation measures to be adopted as part of the Project are listed in **Table 10.8.1** in **ES Chapter 10.** Those measures applicable to the construction phase would be implemented as part of the **Code of Construction Practice (CoCP)** which is to be secured through the DCO. A **CoCP** is provided at **ES Appendix 5.3.2** (Doc Ref. 5.3)**.** Other measures that does

not relate to the construction phase will be secured via requirements in the **draft DCO** or existing legislative regimes:

- **Discovery Strategy** – a watching brief undertaken at construction stage to include a procedure to follow in the event that previously unknown contamination is discovered
- **Ground Investigations** - where assessment of historical data cannot demonstrate that the risk of contamination is low, intrusive ground investigations would be undertaken. Where appropriate, the investigations will include geotechnical testing to provide information on land stability. Where considered necessary slope stability assessment will be undertaken.
- **Remediation Strategy** - where the results of the ground investigation determine that remediation is required to ensure that the site is suitable for its proposed use, a remediation strategy would be prepared.
- **Materials Management Plan** – this will be prepared to document the management of soils on the site (including the raising of Pentagon field) and include a risk assessment procedure to demonstrate the soils do not present a risk to human health or the environment.
- **Reuse of Surplus Material** – opportunities will be explored to reuse offsite the surplus cohesive material of the Weald Clay Formation which cannot be retained on site and/or explore opportunities with brickworks operators within the county to receive incidentally recovered brick clay.
- **Measures to prevent and control spillage of harmful liquids** - this would ensure appropriate storage and handling of materials and products.
- **Measures to protect groundwater during construction** – as set out in the **Water Management Plan** (ES Appendix 5.3.2)
- **Measures to mitigate risks to construction workers -** from contamination (including ground gas)
- **UXO Mitigation Strategy**

8.16.17 The assessment has considered potential impacts on non-agricultural soil resources, the underlying aquifers, surface watercourses, human health (construction workers and future site users) and mineral resources for the initial construction period 2024-2029, 2030-2032 (which would include much of the highways improvements and the first full year of opening in 2029), 2033-2038 and the design years 2038 and 2047. The significance of effect ranges from temporary minor adverse effects with regard to human health during construction where remediation is required, to no change during the operational phase. Therefore, the effects of the Project on geology and ground conditions are not considered significant.

Planning Policy Compliance

8.16.18 As agreed within the **Scoping Opinion (ES Appendix 6.2.2)** (Doc Ref. 5.3) and because there are no geological SSSIs or LGSs located within 500 metres of the NRP site boundary, the effects of the Project on designated geological sites has been scoped-out of the assessment.

8.16.19 In terms of land stability, a preliminary assessment of ground instability has been carried out in accordance with paragraph 5.228 of the ANPS. Any requirement for land stability assessment will be identified and undertaken, where necessary, as part of detailed design to ensure that any proposed development remains stable.

8.16.20 In terms of contamination, and through adopting the mitigation measures proposed, the site has been found to be suitable for its intended use in accordance with paragraph 5.110 of the ANPS. It will not contribute to or be put at risk from exiting land contamination in accordance with paragraph 5.125 of the ANPS.

8.16.21 There are no significant effects expected to Mineral Safeguarded Areas in accordance with paragraphs 5.117 and 5.121 of the ANPS and paragraphs 5.169 and 5.182 of the NNNPS. Opportunities to use excavated material as a mineral are to be explored and where this is achieved this would further mitigate the impact.

8.16.22 A number of mitigation measure embedded as part of the NRP including drainage measures and pollution control measures to control airport operations beyond such measures that are already employed, will ensure that there is no increased potential for impacts on the water environment, especially the quality of the surface and groundwater through the discharge of waters contaminated with de-icer along with hydrocarbons and other pollutants in accordance with paragraphs 5.174 and 5.181 of the ANPS and paragraphs 5.219 to 5.231 in the NNNPS. In accordance with paragraph 174(e) of the NPPF, the NRP will prevent new (and existing) development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of water pollution.

8.16.23 The Project has been assessed as being in accordance with relevant policies on land contamination, land instability, water quality and safeguarding of mineral resources and should be afforded neutral weight in the planning balance.

8.17 Artificial Light, Smoke and Steam

Policy Context

8.17.1 Paragraphs 5.230 to 5.238 of the ANPS relate to the potential for the construction and operation of airports infrastructure create a range of emissions such as dust, odour, artificial light, smoke and steam. Section 8.3 of this Planning Statement sets out how the Project has been assessed for dust and odour emissions in light of the advice in the ANPS. This section therefore concentrates on how the potential effects from artificial light, smoke and steam have been considered.

8.17.2 Paragraph 5.231 of the ANPS states that because of the potential effects of emissions (including artificial light, smoke and steam), that it is important that these impacts are considered by the Applicant in its application, by the Examining Authority in examining applications, and by the SoS in taking decisions on development consent. Paragraph 5.232 in the ANPS recognises that for nationally significant infrastructure projects of the type covered by the ANPS some impact on amenity for local communities is likely to be unavoidable. However, impacts should be kept to a minimum and should be at a level that is acceptable.

8.17.3 Paragraph 5.233 of the ANPS states that the applicant should assess any likely significant effects on amenity from artificial light, smoke and steam and other emissions in the ES. Paragraph 5.236 states that the SoS should ensure the Applicant has provided sufficient information to show that any necessary mitigation will be put into place. Paragraph 5.237 in the ANPS states that the SoS should be satisfied that all reasonable steps have been taken, and will be taken, to minimise any detrimental impact on amenity from emissions of artificial

light, smoke and steam.

8.17.4 The NNNPS largely repeats the requirement of the ANPS insofar as it relates to the emissions of artificial light, smoke and steam in paragraphs 5.81 to 5.88.

Assessment

8.17.5 The Project does not include any development nor will it result in activities that would give rise to potential for impacts from smoke or steam. Whilst the Project proposes the relocation of the fire training ground, this will not result in any intensification of current uses in terms of firefighter training. As the new facility is only slightly further north of the existing facility, no assessment of smoke has been carried out.

8.17.6 **ES Appendix 5.2.2** is the **Operational Lighting Framework** (Doc Ref. 5.3). It provides an overarching framework to create a consistent, welcoming, sustainable and safe environment after dark. It also considers its role in supporting sustainable development, with measures to minimise environmental impact wherever possible and impacts on local area residents and users of the space. It considers the visual requirements for each type of space or facility and provides guidance not only on providing a sense of safety and security, but also to ensure that it is done in a sustainable manner.

8.17.7 The **Operational Lighting Framework** will inform the next stage of detailed designing, research analysis, simulation and lighting calculations. It will also apply to the ongoing renewal of existing facilities within the airport site. It is included as an Annex to the **CoCP** (Doc Ref. 5.3) which will be secured as a requirement to the DCO.

8.17.8 The underlying strategy for the use of light in the Project and the wider Gatwick Airport has five elements:

- To create an inclusive, comfortable environment and passenger experience that is positively memorable.
- To aid wayfinding and help passengers on their journey to, through and from the airport.
- To create continuity and coherence between spaces.
- The conservation of energy.
- Minimising obtrusive light and its impact on neighbouring receptors.
- To support safety and security for all airport users.

8.17.9 Lighting designs will consider and mitigate potential impact towards relevant sensitive receptors, such as residents, heritage sites and local flora and fauna. Obtrusive light (including flicker, glare, light intrusion and sky glow) will be managed to ensure that it does not result in physiological and ecological problems. They will also consider the relevant sustainability goals set out in GAL's Second Decade of Change Sustainability Policy. Gatwick already adopt technical standards to control lighting system designs and these standards will be reflected in the production of future designs.

8.17.10 The **Operational Lighting Framework** (Figure 12) has identified key sensitive receptors in relation to the Project site including ecology and wildlife and other sensitivity receptors (woodland and flowing water eg. River Mole, Gatwick Stream and Crawter's Brook) which require specific consideration to ensure that potential adverse artificial lighting effects are identified, controlled and mitigated. The effects of artificial lighting on ecological receptors have been considered in **ES Chapter 9: Ecology and Nature Conservation** (Doc Ref. 5.1).

Implementation of best-practice methods for lighting pollution prevention during construction plus measures contained in the Lighting Strategy (to be secured via the **CoCP**) including directional lighting and lighting that minimises light spill would ensure that impacts to and effects on ecology and the natural environment would be minimised.

8.17.11 Mitigation is typically in the form of lighting equipment utilising precise optics and lenses, baffles and light shields, in conjunction with a suitable lighting control regime. Individual habitat requirements may necessitate the specification of a particular lighting spectrum. In the context of the complex and intensive activity associated with an airport, of which many are safety critical, health and safety of site workers is of paramount importance. However, ecological mitigation should be proportionate and not at the expense of safety.

Planning Policy Compliance

8.17.12 In accordance with paragraphs 5.231 and 5.233 of the ANPS, the potential effects of emissions from including artificial light have been considered in the DCO application. Through implementing the **CoCP** which includes the **Operational Lighting Framework**, impacts will be kept to a minimum and a level that is acceptable. Therefore, neutral weight should be afforded to the planning balance.

8.18 Major Accidents and Disasters

Policy Context

8.18.1 Paragraph 4.5 of the ANPS states that environmental, safety, social and economic benefits and adverse impacts should be considered at national, regional and local levels and that the SoS will have regard to the manner in which such benefits are secured, and the level of confidence in their delivery. Paragraph 4.35 further states that the Examining Authority and SoSs will take into account the ultimate purpose of the infrastructure and bear in mind the operational, safety and security standards which the design has to satisfy. Paragraphs 4.63 to 4.69 are concerned with security and safety considerations. Paragraph 4.64 states that it is Government policy to ensure that, where possible, proportionate protective security measures are designed into new infrastructure projects at an early stage in the project development. The nature of the aviation sector as a target for terrorism means that security considerations will likely apply.

8.18.2 Paragraph 4.65 of the ANPS makes it clear that if the Department for Transport, taking advice from the Civil Aviation Authority, Centre for the Protection of National Infrastructure and others it considers appropriate, forms the opinion that it is satisfied that current and potential future security needs are adequately addressed in the project and that relevant guidance on these matters has been appropriately taken into account in the application, it will provide confirmation of this to the SoS, and the Examining Authority should not need to give any further consideration to the details of the security measures during the examination. Paragraph 4.66 states that the Applicant should only include such security-related information in the application as is necessary to enable the Examining Authority to examine the development consent issues and make a properly informed recommendation on the application.

8.18.3 Paragraph 3.10 of the NNNPS states that scheme promoters are expected to take

opportunities to improve road safety, including introducing the most modern and effective safety measures where proportionate.

8.18.4 Paragraph 45 of the NPPF states that local planning authorities should consult the appropriate bodies when considering applications for the siting of, or changes to, major hazard sites, installations or pipelines, or for development around them. Paragraph 97 states that planning decisions should promote public safety and and take into account wider security and defence requirements by (amongst others) anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security.

Assessment

8.18.5 **ES Appendix 5.3.4 Major Accidents and Disasters** (Doc Ref. 5.3) provides the results of the assessment of the risks associated with the Project with respect to potential major accidents and disasters. The appendix should be read alongside **ES Chapter 5: Project Description** and **ES Chapter 12: Traffic and Transport (Doc Ref. 5.1)** which consider the Project effects on safety on the local road network. The consideration of major accidents and disasters has the objective of ensuring that the Project itself, and any relevant environmental and human receptors, are resilient and not vulnerable to any significant adverse effects arising from major accidents and/or disasters. Detailed policy and guidance relevant to the assessment of likely significant effects of the Project in relation to major accidents and disasters is contained in Annex 2 in **ES Appendix 5.3.4 Major Accidents and Disasters** (Doc Ref. 5.3).

8.18.6 Currently, there is no well-established guidance or standard for assessment of major accidents and disasters within EIA. Emerging best practice for the evaluation of major accidents and disasters for other recent airport projects has been reviewed and integrated into the approach adopted for the assessment. Where Public Safety Zones (PSZs) are concerned, the assessment has made reference to the policy paper “Control of Development in Airport Public Safety Zones, Department for Transport Circular 01/2010 (Department for Transport, 2010)”[79].

8.18.7 The major accident and disaster assessment considers events/scenarios in two main categories vulnerability of the Project to external natural and man-made hazards; and major accident and disaster events and risks which could be generated or exacerbated by the Project. Receptors that may be affected by major accidents and disasters are both human and environmental. The receptors that have been considered in the assessment are set out in Section 2 of **Appendix 5.3.4** in the **ES.**

8.18.8 The major accident and disaster events/scenarios taken into account in the assessment are listed in **Table 2.4.1** in **ES Appendix 5.3.4. Table 5.1.1** describes the protocols and procedures that are currently in place at Gatwick to manage the risks associated with major accidents and disasters. These protocols will generally be expanded (with the necessary

[79] Control of development in airport public safety zones - GOV.UK (www.gov.uk)

revisions) to cover the Project and thereby maintain risk-control practices following its implementation to ensure the ongoing safe operation of the airport.

8.18.9 The new standardised Public Safety Zones (PSZs) for the main runway are now shorter than the previous ones. Whilst the Project would lead to standardised PSZs being introduced for the northern runway, neither its current, nor reduced standardised PSZs for the main runway extend to affect development proposals in any significant way. The PSZ at the eastern end of the main runway cuts across long stay car parking (which is acceptable in PSZ policy terms). Pentagon Field at the eastern most tip of the main runway PSZ is no longer proposed for car parking. The **ES** does not therefore include a PSZ assessment.

8.18.10 The increased demand for humanitarian support (local emergency response) as a consequence of increasing passenger throughput has been raised in consultations responses. Whilst the Project would result in an increase in passenger numbers and total aircraft movements, it would not introduce fundamentally new or "bigger" hazards and thus, within the frequency with which major events occur, would not be expected to result in higher demands and pressures on acute hospitals, local authorities and rest centres.

8.18.11 A risk tolerability assessment has been undertaken for major accident and disaster scenarios identified as having the potential for a 'significant effect'. When accounting for the measures incorporated within the Project design which would mitigate associated risk, all of the identified major accident and disaster scenarios with the potential to result in harm to people are considered 'broadly acceptable'. Damage to the environment has been assessed as being at low risk and at the very least, 'broadly acceptable'. Consequently, the assessment concludes that no intolerable risks or significant effects have been identified.

Planning Policy Compliance

8.18.12 The assessment of major accidents and disasters has been completed in accordance with the requirements of paragraphs 4.5 of the ANPS. The scheme design, which includes measures as part of the Project to reduce vulnerability, increase resilience and ensure public safety and security, has been found to satisfy the operational, safety and security standards in accordance with paragraphs 4.35 and 4.63-4.69 of the ANPS and paragraphs 45 and 97 of the NPPF.

8.18.13 As an operator of an existing airport, GAL is frequently engaging with the Civil Aviation Authority and other national security bodies. It complies with national security legal requirements throughout its operational activities and any development activities. The Project is no exception to this. The CAA has not identified any security implications arising from the delivery of the Project that require to be addressed at this stage (paragraph 4.65 of the ANPS).

8.18.14 In terms of road safety, this has been an important consideration in the development of the highways scheme including through discussions with National Highways. GAL has taken opportunities to improve road safety where proportionate in accordance with paragraph 3.10 in the NNNPS.

8.19 Health and Wellbeing

Policy Context

8.19.1 Paragraphs 4.70 to 4.73 of the ANPS relate to health. Paragraph 4.70 recognises that the construction and use of airports infrastructure has the potential to affect people's health, wellbeing and quality of life. It further acknowledges that infrastructure can have direct impacts on health because of traffic, noise, vibration, air quality and emissions, light pollution, community severance, dust, odour, polluting water, hazardous waste and pests. Paragraph 4.71 also recognises that new or enhanced airports infrastructure may also have indirect health impacts, for example if they affect access to key public services, local transport, opportunities for cycling and walking, or the use of open space for recreation and physical activity. The ANPS notes however that the increased employment stemming from airport expansion may have indirect positive health impacts.

8.19.2 Paragraph 4.72 of the ANPS requires ESs to identify and assess any likely significant health impacts where the proposed project has likely significant environmental impacts that would have an effect on human beings. Paragraph 4.73 requires the Applicant to identify measures to avoid, reduce or compensate for adverse health impacts as appropriate. Additionally, the ANPS recognises that these impacts may affect people simultaneously, so requires the Applicant, the Examining Authority and the SoS (in determining an application for development consent) to consider the cumulative impact on health.

8.19.3 There are other references within the ANPS that require Applicants to assess any likely significant health impacts of a proposal from hazardous waste, water quality, air quality and in particular, from noise. Paragraph 5.47 of the ANPS in particular states that the Government wants to strike a fair balance between the negative impacts of noise (on health, amenity, quality of life and productivity) and the positive impacts of flights.

8.19.4 Paragraph 1.37 of the ANPS states that an application should include and propose health mitigation, which seeks to maximise the health benefits of the scheme and mitigate any negative health impacts.

8.19.5 Paragraphs 4.79 to 4.82 of the NNNPS relates to health and largely repeats what is set out in the ANPS. Paragraph 4.79 recognises that national road network projects can have direct impacts on health because of traffic, noise, vibration, air quality and emissions, light pollution, community severance, dust, odour, polluting water, hazardous waste and pests.

8.19.6 The NPPF states in paragraph 8 that achieving sustainable development means supporting strong, vibrant and healthy communities including their health, social and cultural wellbeing. Section 8 of the NPPF relates to promoting healthy and safe communities and states that planning decisions should aim to achieve healthy inclusive and safe places (paragraph 92). There are several references in the NPPF which recognise the importance of promoting health in the planning system including through providing access to a network of high quality open spaces (paragraph 98); reducing congestion and emissions and improving air quality through limiting the need to travel and offering a genuine choice of transport modes (paragraph 105); and ensuring that new development is appropriate for its location taking into account the likely effects of pollution on health including by mitigating and reducing to a minimum, adverse impacts from noise (paragraph 185).

Assessment

8.19.7 **ES Chapter 18: Health and Wellbeing** (Doc Ref. 5.1) provides an assessment of whether or not the Project would give rise to likely and significant population effects on human health (beneficial or adverse). The assessment draws from and builds upon various other technical chapters within the **ES** (Doc Ref. 5.1) which provide the basis of the assessment of the effects on health and wellbeing notably:

- ES Chapter 8: Landscape, Townscape and Visual Resources;
- ES Chapter 10: Geology and Ground Conditions;
- ES Chapter 11: Water Environment;
- ES Chapter 12: Traffic and Transport;
- ES Chapter 13: Air Quality;
- ES Chapter 14: Noise and Vibration;
- ES Chapter 17: Socio-economic Effects
- ES Chapter 19: Agricultural Land Use and Recreation

8.19.8 The key determinants of health covered within the scope of the assessment are:

- Bio-physical environment changes in air quality, noise, water quality, ground contamination and lighting.
- Social environment changes in transport, including effects on health-related behaviours such as physical activity.
- Economic environment changes in employment and skills opportunities, as well as indirect economic benefits.
- Institutional environment changes in healthcare service capacity, including onsite provision and supporting routine NHS strategic planning functions.

8.19.9 **Table 18.7** in **ES Chapter 18** sets out the issues that are considered in the health assessment. They are summarised as follows:

- Construction and demolition activities within existing airport boundary, including construction of upgraded highway junctions and associated changes in surface transport:
    - Environmental (changes in air quality, the water environment, ground conditions, noise and light exposure from construction activities and road traffic).
    - Transport (severance, pedestrian/cyclist amenity, risk of accident and injury).
    - Lifestyle (access to open space, barriers to physical activity etc.).
    - Socio-economic (employment opportunities and associated income generation).
    - Impacts on local healthcare capacity from the introduction of a large workforce.
    - Health risks from pests.
- Use of the airport, including upgraded highway junctions:
    - Environmental (changes in air quality, the water environment, ground conditions, noise and light exposure from operational activities, eg aircraft/support operations/road traffic).
    - Transport (severance, pedestrian/cyclist amenity, risk of accident and injury).
    - Lifestyle (access to open space, barriers to physical activity etc.).

- Socio-economic (employment opportunities and associated income generation).
- Impacts on local healthcare capacity from changes to the operational workforce and increase in passenger throughput (on ambulance and NHS emergency department services).
- Extended operational hazards (specifically, the risk of transmission of communicable diseases). Changes to Public Safety Zones are considered in the Major Accidents and Disasters assessment.

8.19.10 **Section 18.5** in **ES Chapter 18** (Doc Ref. 5.1) and **ES Appendix 18.5.1: Health Baseline Trends, Priorities and Vulnerable Groups** and **ES Appendix 18.5.2: Health and Wellbeing Baseline Data Tables** (Doc Ref. 5.3) set out the health and wellbeing baseline trend information that has been used in the assessment. This puts into context the local health circumstances of the communities within the study area adopted for the assessment. The study area is relatively affluent with relatively low levels of deprivation. The areas with the highest levels of overall deprivation in the study area are in the south-west of Crawley (Southgate and Broadfield areas), with the least deprived areas located in the eastern half of Crawley (Pound Hill, Maidenbower) and in the northern parts of Horley. Physical and mental local health circumstance in the study area can be considered good. In most circumstances, health status is better than the national average and more comparable to the regional average. Consequently, it is not considered that the local populations would be particularly sensitive to socio-economic or environmental changes associated with the construction and operation of the Project.

8.19.11 It is important to note that GAL already operate a range of initiatives that allow the local community to share the benefits generated by the airport. GAL support community-related projects and programmes across the region (see Section 2.7 of this Planning Statement for further details). All community initiatives fall under the categories of economy; environment; health and wellbeing; education; employment and skills; community investment; or community.

8.19.12 **Table 18.17** in **ES Chapter 18** (Doc Ref. 5.1) lists the mitigation and enhancement measures that have been adopted as part of the Project. These include measures to limit environmental precursors (such as pollutants), as well as various provisions that support vulnerable groups (such as measures incorporated into the noise insulation scheme and employment, skills and business strategy). Measures taken into account by the health assessment that are secured in the DCO include:

- **ES Appendix 5.3.2**: Code of Construction Practice (Doc Ref. 5.3)
- **ES Appendix 5.3.2:** CoCP Annex 2 - Outline Construction Workforce Travel Plan (Doc Ref. 5.3)
- **ES Appendix 5.3.2:** CoCP Annex 3 - Outline Construction Traffic Management Plan (Doc Ref. 5.3)
- **ES Appendix 5.2.2:** Operational Lighting Framework (Doc Ref. 5.3)
- **ES Appendix 5.4.1:** Surface Access Commitments (Doc Ref. 5.3)
- **ES Appendix 13.8.1:** Air Quality Construction Phase Mitigation (Doc Ref. 5.3)
- **ES Appendix 14.9.10:** Noise Insulation Scheme (Doc Ref. 5.3)
- **ES Appendix 17.8.1:** Employment, Skills and Business Strategy (Doc Ref. 5.3)
- **ES Appendix 19.8.2:** Public Rights of Way Management Strategy (Doc Ref. 5.3)

8.19.13 Further measures are proposed to be secured through the Section 106 Agreement and are listed in the **ES** chapters that inform the health assessment. Key DCO requirements and Section 106 Agreement obligations related to healthcare service demand that are taken into account by the health assessment include:

- In relation to construction workers, appropriate onsite occupational health provision, as well as a protocol to manage healthcare demand so as to reduce use of the local NHS. Secured through the **ES Appendix 5.3.2: CoCP** (Doc Ref. 5.3).

- In relation to airport passengers, appropriately scaled onsite medical emergency first responders, first aid training and equipment, as well as data sharing to support routine NHS strategic service planning. Secured through the Section 106 Agreement.

8.19.14 In relation to continuing to meet relevant statutory obligations, GAL will continue to provide appropriate occupational healthcare to its employees as numbers increase and port health activities (e.g. communicable illness surveillance at the airport) would be scaled in line with passenger growth. Gatwick is also continuing collaboration with the local Integrated Care Board to explore options for improving Airport workers' access to NHS screening and clinics.

Air Quality

8.19.15 In terms of health and wellbeing effects from changes to air quality, the assessment of health significance is with reference to the statutory air quality standards set for the purpose of health protection by the Government. World Health Organisation (WHO) air quality guideline values are referenced as an aspirational target. The assessment has been undertaken using a conservative approach for future background pollutant concentrations and road traffic emissions.

8.19.16 Overall, the minor adverse air quality assessments reflect that, whilst any reduction in air quality may be considered detrimental to some degree for public health i.e. not negligible, the change due to the Project is not significant for population health. Regard has been given to the baseline context, the WHO 2021 advisory guidelines (WHO, 2021), the updated PM2.5 standards (UK Government, 2023), to non-threshold effects and to ultra-fine particulates (UFP).

8.19.17 The differences between the central case and the slow transition case have been considered and they are not considered to materially affect the conclusions as to the significance of the population health effects.

8.19.18 No further mitigation or monitoring measures are proposed. Appropriate monitoring is set out in **ES Appendix 13.8.1: Air Quality Construction Phase Mitigation** (Doc Ref. 5.3). **ES Chapter 13: Air Quality** (Doc Ref. 5.1) Section 13.9 sets out mitigation measures to reduce effects as far as practicable, as well as operational air quality monitoring, including a commitment to participate in national aviation industry body studies of UFP emissions at airports. The residual significance of effects would remain unchanged i.e. minor adverse (not significant) effects for population health.

Noise Exposure

8.19.19 For the assessment of health and wellbeing effects from changes to noise exposure, findings on the population health implications of changes in daytime and night-time noise from

aviation (both air noise and ground noise), as well as from surface access have been considered. The main health outcomes relevant to this determinant of health are cardiovascular and cardio-metabolic, as well as mental health outcomes (e.g. stress, anxiety or depression relating to annoyance). Sleep disturbance, particularly associated with changes to night-time noise levels, has the potential to affect daytime functioning, physical health and mental health. Cognitive performance in children, particularly at school is also a potential outcome.

8.19.20 In reaching population health conclusions, account has been taken of the extent and degree of change in effects above the Significant Observed Adverse Effect Level (SOAEL), as well as changes that are anticipated to occur between the SOAEL and the Lowest Observed Adverse Effect Level (LOAEL). Supplementary metrics and a physiological sleep disturbance assessment have also informed the professional judgements reached.

8.19.21 Overall, the minor adverse noise scores reflect that, whilst any increase in aviation and surface access noise may be considered detrimental to some degree for public health, i.e. not negligible; the change due to the Project is not significant for population health in EIA Regulation terms.

8.19.22 The differences between the central case and the slow transition case have been considered and they are not considered to materially affect the conclusions as to the significance of the population health effects.

8.19.23 No further mitigation measures are proposed. Appropriate mitigation is discussed in **ES Chapter 14: Noise and Vibration** including **ES Appendix 14.9.10: Noise Insulation Scheme** (Doc Ref. 5.3) and appropriate monitoring measures such as Flight Performance Team reports and annual Noise Contour Reports. The Noise Insultation Scheme includes appropriate measures in relation to vulnerable groups. The residual significance of effects would remain unchanged, i.e minor adverse (not significant) effects for population health.

Transport Nature and Flow Rate

8.19.24 The assessment considers the population health implications of changes in operational road traffic affecting road safety, travel times, accessibility and active/sustainable travel for community residents, emergency services, airport visitors/passengers and airport staff. For road safety, health effects may be associated with the severity or frequency of road traffic incidents. For accessibility, health effects may be associated with emergency response times or non-emergency treatment outcomes associated with delays or non-attendance. For active/sustainable travel, health effects may relate to physical health (e.g. cardiovascular health) and mental health conditions (e.g. stress, anxiety or depression) associated with obesity and levels of physical activity.

8.19.25 Overall, a minor adverse transport scores reflect that, whilst the increase in traffic volumes results in a very slight reduction in road safety, slight increase in journey times and slight reduction in active travel amenity, and this is considered detrimental to some degree for public health, i.e. not negligible, the change due to the Project is not significant for population health. The embedded mitigating role of highway improvements are taken into account.

8.19.26 No further mitigation or monitoring measures are proposed. Appropriate monitoring is set out as part of the **ES Appendix 5.3.2: CoCP Annex 3 - Outline Construction Traffic Management Plan** (Doc Ref. 5.3) **ES**and the **ES Appendix 5.4.1: Surface Access**

Commitments (Doc Ref. 5.3), . The residual significance of effects would remain unchanged, i.e. minor adverse (not significant) effects for population health.

Lifestyle Factors

8.19.27 The assessment considers the implications of changes in availability of public areas of open space and active travel walking and cycling routes on the population's health. The main health outcomes are likely to relate to the health benefits of accessing areas of public open space including physical activity, as well as general wellbeing benefits from social interactions, recreation, leisure and play. Health outcomes span physical health (e.g. cardiovascular health) and mental health (e.g. stress, anxiety or depression).

8.19.28 Overall, minor adverse and minor beneficial lifestyle scores reflect that, whilst there would be some temporary reductions in active travel opportunity and open space, there would also be diversions that maintain access and new open spaces will be created. The embedded active travel enhancements, including as part of highway improvements, and the planting and amenity enhancements of new community open spaces are considered proportionate and beneficial. Whilst the disruption caused by the Project is considered detrimental to some degree for public health, i.e. not negligible, a sustained widespread reduction in active travel or use of outdoor spaces is not expected, including for vulnerable groups. Consequently, changes due to the Project are not considered significant for population health.

8.19.29 The differences between the central case and the slow transition case have been considered and they are not considered to materially affect the conclusions as to the significance of the population health effects.

8.19.30 No further mitigation measures are proposed. Appropriate construction period monitoring is set out as part of the **ES Appendix 19.8.2: Public Rights of Way Management Strategy** (Doc Ref. 5.3). The monitoring of the establishment of the landscaping proposals within the replacement areas of open space would be undertaken in accordance with the **ES Appendix 19.8.2: Public Rights of Way Management Strategy** (Doc Ref. 5.3). The residual significance of effects would remain unchanged, i.e. minor beneficial and minor adverse (not significant) effects for population health.

Socio-Economic Factors

8.19.31 The assessment considers the implications of increased employment and economic impacts on the population's health. Employment is an important determinant of health and wellbeing both directly and indirectly by making health-promoting resources available to an employee and any dependants. The socio-economic benefits associated with employment are improved living conditions and the potential to make healthier choices, e.g. eating a healthier diet and undertaking more physical activity. If members of the community are employed, this can also generate indirect economic activity.

8.19.32 Overall, the minor to moderate beneficial socio-economic scores reflect that the Project would provide construction and operational employment and training opportunities that would benefit public health directly and indirectly. The moderate beneficial effects relate to a level of operational employment due to the Project that would be significant for population health.

8.19.33 The public health opportunities relate to the tailoring of good quality employment and training opportunities to vulnerable groups, particularly locally in areas such as Crawley, that have a

baseline of poorer health outcomes. The Project would commit through the **ES Appendix 17.8.1: Employment, Skills and Business Strategy (ESBS)** (Doc Ref. 5.3) to advertising and interviewing for jobs within the local study area and promoting the opportunities through channels accessible to vulnerable groups. The **ESBS** also includes a series of training, employment and procurement initiatives that will aid in addressing existing local barriers to a range of employment opportunities locally, including relevant measures targeted at vulnerable groups. With these additional measures, inequalities for vulnerable groups could be influentially improved. Where there is a successful and sustained intervention targeting those with existing disadvantage particularly young adults and those in long-term unemployment, the following residual effect conclusions would be:

- In the assessment years of 2024-2029 and 2029 the construction benefits could be improved up to moderate beneficial (significant).
- In 2032, 2038 and 2947 the operational benefits could be improved up to major beneficial (significant).

8.19.34 These residual population health effect scores reflect the public health benefits of targeting project opportunities to vulnerable groups, even where the total number of jobs and apprenticeships is modest within the wider labour markets.

Light Exposure

8.19.35 The assessment considers the health implications of construction and orientational lighting impacts on the population's health. The main health outcomes are likely to relate to sleep disturbance, with tentative evidence of melatonin disruption effects on cancer risk and circadian rhythm disruption on cardiovascular risks. Changes in community identity due to visual impacts may also affect mental health outcomes.

8.19.36 Overall, the minor adverse lighting effect scores reflect that, whilst increases in night-time light exposure may be considered detrimental to some degree for public health, i.e. not negligible, the change due to the Project is not significant for population health. The differences between the central case and the slow transition case have been considered and they are not considered to materially affect the conclusions as to the significance of the population health effects.

8.19.37 No further mitigation or monitoring measures are proposed. Appropriate measures are set out in **ES Appendix 5.2.2: Operational Lighting Framework** (Doc Ref. 5.3). The residual significance of effects would remain unchanged (i.e. up to minor adverse (not significant) effects for population health).

Water Quality, Flood Risk and Ground Conditions

8.19.38 The assessment considers the implications on population health due to potential for pollution releases. Sources of contaminants may include new chemical spills or historic pollutants or toxins. For the community, the potential for exposures may either be via water or via construction dusts. Dust effects are considered under the air quality assessment. The key health outcomes relevant to this determinant of health arise from exposure to contaminated drinking water.

8.19.39 Overall, the minor adverse effect in relation to potential pollution releases reflect that, whilst slight increases in exposure risk related to water quality, flood risks and ground conditions

may be considered detrimental to some degree for public health, i.e. not negligible, the change due to the Project is not significant for population health.

8.19.40 The differences between the central case and the slow transition case have been considered and they are not considered to materially affect the conclusions as to the significance of the population health effects.

8.19.41 No further mitigation or monitoring measures are proposed. Appropriate measures are set out in the **ES Appendix 5.3.2 CoCP** (Doc Ref. 5.3). The residual significance of effects would remain unchanged, I.e. up to minor adverse (not significant) effects for population health.

Local Healthcare Capacity

8.19.42 The assessment considers the potential implications for NHS routine service planning, and any consequent population health effect, of changes in numbers of passengers arriving at the airport (inbound or outbound) as well as demand associated with the Projects workforces. The health assessment considers the current level of demand, e.g. ambulance callouts from the airport, and the expected change due to the proposed uplift in passengers, visitors and workers.

8.19.43 The main health outcomes are likely to relate to unplanned need for NHS attendance whilst at, or travelling to or from, the airport, i.e. suffering a medical emergency as an airport passenger or visitor. Having suitable access to healthcare services, including by workforces, affects early diagnosis, treatment outcomes and preventative measures.

8.19.44 Overall, the minor adverse local healthcare capacity scores reflect that, whilst a slight increase in NHS demand may be considered detrimental to some degree for public health, i.e. not negligible, the change due to the Project is not significant for population health.

8.19.45 No further mitigation measures are proposed. Regarding monitoring, the total medical calls to Gatwick Control Centre and the number of passengers subsequently transferred to hospital will be shared with GATCOM annually. The measure is secured through Section 106 agreement. With such information sharing there can be a high degree of confidence in the effectiveness of routine NHS service planning.

8.19.46 The residual significance of effects would remain unchanged, i.e. up to minor adverse (not significant) effects for population health.

Understanding the Risk (Risk Perception)

8.19.47 The assessment considers findings on a group of issues where the common factor is the potential for a population health effect related to concern about an issue, affecting mental health and wellbeing, rather than the likelihood of an actual level risk to public health. The issues discussed are electromagnetic fields (EMF), extended operational hazards and pests.

8.19.48 Overall, the minor adverse understanding of risk scores reflect the context that airport infrastructure, including electrical infrastructure and fuel storage, as well as public safety zones are an existing feature of the local context that informs population understanding of risk. Furthermore, he Project would include non-technical information on the safeguards in place. Whilst some community concern may be considered detrimental to some degree for public health, i.e. not negligible, the change due to the Project is not significant for population health.

8.19.49 No further mitigation measures are proposed. The actual risks would be well within regulatory standards and that most members of the public would expect this to be the case.

8.19.50 The residual significance of effects would remain unchanged, i.e. up to minor adverse (not significant) effects for population health.

Planning Policy Compliance

8.19.51 The Project has been assessed extensively to understand the potential for direct, indirect and cumulative impacts on health, wellbeing and quality of life taking into account a number of likely effects from a range of topics including air quality and emissions, traffic and noise.

8.19.52 Whilst minor adverse effects on health are expected from the Project, these effects are not expected to be significant. The health benefits of the Project have been maximised and the scheme will promote healthy activity including through providing high quality public open spaces and offering a genuine choice of transport modes for passengers to get to the airport.

8.19.53 The assessment has demonstrated that with the relevant mitigation measures in place, that the Project will not result in unacceptable levels of harm to health, in accordance with relevant planning policies. The employment, skills and training opportunities in addition to the proposed surface access improvements and provision of new public open space, weigh favourably in the planning balance.

8.20 Sustainability

Policy Context

8.20.1 The purpose of the planning system is to contribute to the achievement of sustainable development (paragraph 7 of the NPPF). Paragraph 8 of the NPPF states that achieving sustainable development means that the planning system has three overarching objectives – economic, social and environmental – and that these need to be pursued in mutually supportive ways. Paragraph 9 in the NPPF importantly notes that planning decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.

8.20.2 At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 10). For decision-taking this usually means approving development that accords with an up-to-date development plan without delay. As the development plan is not the starting point for making a decision on this DCO application, this test is not strictly applicable, although consideration of the development plan policies is important and relevant in making a decision as is the NPPF requirement for permission to be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.

8.20.3 Delivering a sustainable aviation sector and sustainable airport growth are Government objectives that underpin its aviation policy as set out most recently in “Flightpath to the Future” (2022) - the Government’s strategic framework for aviation over the next ten years.

8.20.4 As an organisation, GAL ensures that sustainability is part of everything that it does and in 2021, published its Second Decade of Change sustainability policy which will provide a

framework for achieving sustainability goals to 2030 including a commitment to be a net zero airport for its own Scope 1 and 2 carbon emissions by 2030.

Assessment

8.20.5 The **Sustainability Statement** provided as **Appendix D** of this statement (Doc Ref. 7.1) demonstrates how the principles of sustainability have been considered during the design of the Project and shows how these would be further embedded throughout its lifecycle, in accordance with relevant national, regional and local policy, guidance and standards.

8.20.6 The scope of the **Sustainability Statement** is informed by relevant national, regional and local policy and guidance documents. Internal policy documents and GAL-related strategies have also been considered to ensure the development supports and, where feasible, exceeds current objectives and targets.

8.20.7 The **Sustainability Statement** considers how core sustainability principles have been embedded as part of the design evolution. This involved preparing a Sustainability Framework and Initial Appraisal. The core themes of the ANPS Appraisal of Sustainability and the NPPF objectives for achieving sustainable development plus the six sustainability goals and ten sustainability objectives as set out in GAL's Second Decade of Change to 2030 have been used to structure the appraisal.

8.20.8 The sustainability objectives that have been considered in the appraisal have been considered in detail under other themes considered in the planning assessment. Therefore, they are not repeated here.

Planning Policy Compliance

8.20.9 The Project is an innovative and sustainable way of providing a significant increase in capacity without the scale of development or impact normally associated with the construction of a new runway.

8.20.10 The **Sustainability Statement** concludes that the site location, approach to design and proposed mitigation measures would enable a sustainable development to be delivered which supports a number of relevant national and local policies and principles and which addresses the three pillars of sustainability. It has also been demonstrated that the Project can be delivered alongside GAL's own sustainability policy and net zero emission targets.

8.21 Community Compensation

Policy Context

8.21.1 Paragraph 5.239 of the ANPS states that the SoS recognises that, in addition to providing economic growth and employment opportunities, airport expansion will also give rise to negative impacts upon local communities including impacts through land take requiring the compulsory acquisition of houses that fall within the new boundary of the airport, exposure to air quality impacts and aircraft noise. Paragraph 5.240 states that the SoS expects the Applicant to provide an appropriate community compensation package, relevant to planning. In addition to controlling and reducing aircraft noise impacts, this paragraph of the ANPS also states that the Applicant will be required to commit appropriate resources to mitigate the impacts of aircraft through noise insulation programmes for both private homes and public

buildings such as schools.

8.21.2 Paragraph 5.251 of the ANPS states that the SoS will consider whether, and to what extent, the Applicant has sought to minimise impacts on local people. Paragraph 5.253 of the ANPS further states that the SoS will expect the Applicant to demonstrate how the compensation package will be secured and operated. This paragraph in the ANPS further states that the Applicant must also demonstrate how these measures will be administered to ensure that they are enforced and relevant to planning once operational.

8.21.3 The National Planning Practice Guidance (NPPG) advises that in general, planning is concerned with land use in the public interest, so that the protection of purely private interests such as the impact of a development on the value of neighbouring property could not be a material planning consideration.

Assessment

8.21.4 GAL owns, or is in control, of most of the land needed to deliver the Project.

8.21.5 The **Draft DCO** (Doc Ref 2.1) includes powers of compulsory aquisitoin and temporary possession of land and interests in land, with the appropriate compensation being made available to those property or landowners who are affected. The justification for the compulsory acquisiton powers sought under the **draft DCO** is set out in Section 6 of the **Statement of Reasons** (Doc Ref. 3.2). However, before having to resort to this process, GAL is committed to trying to reach an appropriate agreement with all affected landowners wherever practical.

8.21.6 Property owners and occupiers of property who are affected by the Project but which are not subject to compulsory acquisition may be entitled to compensation in respect of a loss of value of a property arising from the development during construction (under section 10 of the Compulsory Purchase Act 1965)[80] and for loss of value arising from the operation of an expanded airport (under Part 1 of the Land Compensation Act 1973)[81].

8.21.7 Gatwick Airport currently operates an existing community fund through the Gatwick Airport Community Trust which awards grants annually for deserving projects within the area of benefit which covers parts of East and West Sussex, Surrey and Kent. The funds are channelled to those areas where people are directly affected by operations at Gatwick Airport and encourage and support schemes that benefit diverse sections of the local community. The Trust is funded under an obligation within the current Section 106 agreement (signed May 2022), with funding linked to annual passenger numbers. The current Section 106 agreement is due to expire on 31st December 2024. The Trust is complemented by a discretionary and voluntary arrangement by GAL known as the Gatwick Foundation Fund which also supports a range of community projects across Kent, Surrey and Sussex, and is managed by the individual Community Foundations. The aim is to merge these funds to create one, new, single Gatwick Community Fund which will be secured through the new NRP Section 106. This fund will have similar aims and will be dedicated to

[80] Compulsory Purchase Act 1965 (legislation.gov.uk)
[81] Land Compensation Act 1973 (legislation.gov.uk)

supporting local communities through the funding of projects within those communities most affected by the airport operations. In addition to the new Community Fund, a Construction Noise Insultation Scheme and Temporary Rehousing Policy are proposed to mitigate any predicted impacts. Noise insultation will be offered for qualifying buildings as defined in the **ES Appendix 14.9.10 Noise Insulation Scheme** (Doc Ref. 5.3) . The current Noise Insultation Scheme operated by GAL to mitigate against air noise will be enhanced for the Project to address expected increases in air noise including additional measures for those households already worst affected by noise. Full details of the new Noise Insultation Scheme can be found in **ES Appendix 14.9.10**. Noise impacts will also be controlled through the proposed **Noise Envelope** which is described in **ES Appendix 14.9.7 The Noise Envelope** (Doc Ref. 5.3).

8.21.8 As part of the Project, Section 106 Heads of Terms have been drafted which seek agreement to secure future measures to support the community. These measures are summarised in Table 5.2 in this Statement.

Planning Policy Compliance

8.21.9 The ANPS recognises that airport expansion will give rise to negative impacts upon the local community but that this can be mitigated through an appropriate community compensation package, relevant to planning. GAL is already very successfully mitigating the impacts of its airport operations on the local community. Many of the measures that are employed successfully today will be extended and/or improved as part of the Project including the Noise Insulation Scheme (which will be enhanced and expanded to include a new Noise Insulation Scheme during the construction period); the new Noise Envelope and the new Community Fund (which will replace the existing Gatwick Airport Community Trust and Foundation Fund payments to those most affected by the airport's operations). GAL is committed to delivering these measures, and other extensive mitigation measures as proposed that will benefit the local community, and in accordance with paragraph 5.253 of the ANPS, has demonstrated how the compensation package for the Project will be secured and operated – principally through the new NRP Section 106 agreement that will be secured as part of the DCO. The funds to be deployed locally via the new Gatwick Airport Community Fund to enhance the quality of life in the community, represent a legitimate and beneficial response to the residual impacts of the Project which cannot be mitigated through more direct mesures. In accordance with paragraph 5.240 of the ANPS, GAL has demonstrated how it seeks to put in place an appropriate compensation package.

8.22 Community Engagement

Policy Context

8.22.1 Paragraphs 5.258 and 5.259 of the ANPS encourage constructive engagement throughout the planning process and state that the SoS will consider whether the Applicant has engaged constructively. Paragraph 5.209 of the NNNPS states that for schemes impacting on the Strategic Road Network, Applicants should have regard to DfT Circular 02/2013 *"The Strategic Road Network and the delivery of sustainable development"* (or prevailing policy) which sets out the way in which the highway authority for the Strategic Road Network, will engage with communities and the development industry to deliver sustainable development

and, thus, economic growth, whilst safeguarding the primary function and purpose of the Strategic Road Network.

8.22.2 Paragraphs 39, 40, 42, 126, 129, 132 and 133 of the NPPF highlight the importance of effective community engagement regarding the design and impacts of any proposed development. Early engagement is recognised as having significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Paragraph 42 in particular encourages the participation of other consenting bodies in pre-application discussions which should enable early consideration of all the fundamental issues relating to whether a particular development will be acceptable in principle.

Planning Policy Compliance

8.22.3 A summary of the pre-application consultation that has taken place is provided in Section 1.6 of this Statement.

8.22.4 The **Consultation Report** (Doc Ref. 6.1) provides full information of the pre-application engagement that has taken place (in accordance with paragraphs 5.258 and 5.259 of the ANPS) and demonstrates how GAL have complied with the statutory pre-application consultation requirements, and that they have had regard to the responses. It also provides information on the the non-statutory consultation and informal engagement undertaken by GAL about the Project.

8.22.5 Chapter 3 of the **Consultation Report** summarises GAL's stakeholder and community engagement on the Project from preparation of their Masterplan in 2018 up to submission of the DCO application in July 2023. A record of the activities undertaken, organisations represented at meetings and events and a summary of the topics discussed can be found in the **Part A Appendices to** the **Consultation Document** (Doc Ref. 6.2). The main stages of consultation were as follows:

- **draft Master Plan 2018** – a non-statutory consultation which ran from 18 October 2018 to 10 January 2019. In line with Government policy the draft master plan looked at how Gatwick Airport could 'make best use of the existing runways' and explained how it could meet growing demand for air travel and provide the UK with enhanced global connectivity beyond 2030;
- **Autumn 2021 Consultation** – a statutory consultation which ran from 9 September to 1 December 2021. The consultation set out the key elements required to enable dual runway operations and support increased passenger numbers. It also included information about the economic benefits of the Project, an updated Noise Insulation Scheme, a Homeowners Assisted Moving Scheme, and the proposed approach to construction; and
- **Summer 2022 Consultation** – a hybrid statutory/non-statutory consultation which ran from 14 June to 27 July 2022. A targeted, statutory consultation considered changes to the proposed highway improvement works (which involved amendments to the red line and included some new or materially different environmental effects to those reported previously). The non-statutory Project update part of the consultation included proposed changes to other aspects of the proposals, namely car parking, the airfield, hotels and offices, and the strategies relating to water management, carbon, noise, as well as other Project updates.

8.22.6 To provide greater certainty to consultees about the ways in which they could seek

information and share their views particularly over the Covid-19 pandemic period, whilst also respecting public safety and allowing for any restrictions that might have been in place during the consultation period, GAL designed a consultation strategy that offered access to the consultation both online and offline which included a project website containing a virtual exhibition and document room, 'call the expert' telephone surgeries which allowed members of the public to speak direct to technical experts about the Project and a Mobile Project Office which visited local communities to distribute consultation materials.

8.22.7 GAL published a Statement of Community Consultation (SoCC) in August 2021 in advance of the statutory consultation in Autumn 2021 (see **Appendix B.2** in the **Consultation Report**) (Doc Ref. 6.2). This document was prepared in accordance with Section 47 of the Act. It set out how GAL proposed to consult about the DCO application. Prior to preparing the SoCC, GAL consulted all the host and neighbouring Local Authorities about what was to be included in the statement. GAL's proposed approach to carrying out targeted statutory consultation (proportionate to the likely impacts of the changed highways proposals) was set out in 'Gatwick Northern Runway Project: Further Consultation' and shared with the local authorities for feedback in May 2022 (see **Appendix B.9** in the **Consultation Report**) (Doc Ref. 6.2). This was in line with GAL's commitment in the SoCC to working with relevant local authorities should there be a need for further stages of targeted consultation.

8.22.8 GAL established Topic Working Groups (TWGs) to engage local authorities in the development of the scope and methodologies for environmental, economic, and other studies and ultimately to support the creation of Statements of Common Grounds for when the DCO application is accepted. Details of the TWGs are set out in Section 3.4 of the **Consultation Report** (Doc Ref. 6.1).

8.22.9 The key outcomes from the Autumn 2021 consultation are as follows:

- 16.1 million people were reached by press activity.
- The Project website attracted over 66,000 page views (more than four times as many as for the non-statutory consultation on the Master Plan 2019).
- 6,645 responses to the consultation were received (a 25% increase on the Master Plan 2019 non-statutory consultation numbers), with 95.5% submitted electronically.
- 7,871 people visited the virtual exhibition (more than three times the number that visited in-person Master Plan 2019 non-statutory consultation events).
- 360 stakeholders attended virtual briefings.
- 439 people visited the Moblile Project Office and 37 people 'called the expert' via telephone surgeries.

8.22.10 In response to the feedback from the Autumn 2021 consultation, the following changes were introduced:

- The road improvement plans were revised to provide a layout that was more intuitive while still meeting the needs of local non-airport and airport traffic. The Project team revisited previous options considered and undertook further assessment against criteria. In summary, these changes included:
    - M23 Spur: Additional widening of the M23 Spur which would temporarily remove access to the Sussex Border Path (which would be temporarily diverted).

- South Terminal Roundabout: Minor design amendments to the South Terminal Roundabout at the westbound on-slip to reflect the changes proposed to Airport Way. Part of the land north of the roundabout would be used as a temporary construction compound which requires access from an additional temporary northern arm off the roundabout. Land take has been refined and reduced.
- Airport Way: A third lane has been introduced to the westbound Airport Way to provide additional capacity and resilience. This would require a short closure period of the railway. Temporary land required for the works has been included within the Order Limits. The Airport Way eastbound link from the North Terminal roundabout would be removed. This traffic would access the M23 Spur via the proposed signalised junction on the A23 London Road.
- North Terminal Roundabout: The North Terminal Roundabout has seen the greatest change. The flyover connection remains but the roundabout would have a large diameter to increase its capacity with arms removed or relocated, including the introduction of new signalised junction and a redesigned link to the A23 London Road. There would be a considerable loss of vegetation from within the highway boundary which would be replaced.
- A23 London Road: Proposals for a noise barrier between the highway and southern boundary of Riverside Garden Park have been refined which would require construction activities along the edge of the park, involving temporary vegetation loss and embankment works. To accommodate the westbound widening over the River Mole, alternations to a bridge deck would be required that would also incorporate the new shared path proposed to improve connectivity between Longbridge Road and the terminals.

- Longbridge Roundabout: An additional section of widening to accommodate three lanes from the North Terminal flyover.

- A23 Brighton Road: Changes to land requirements have been made to facilitate the re-provision of utilities alongside the widening of the bridge over the River Mole.

- A limited number of other changes were also proposed to airfield infrastructure, including aircraft engine running areas, Hangar 7, the east-west runway track, and the alignment of the north-west noise bund to improve noise mitigation for Charlwood residents.

- Feedback was also received regarding the Applicant's commitment to sustainable travel. This has resulted in fewer new on-airport car parking spaces being proposed This has been balanced with the need to prevent additional off-airport parking and its consequences on local communities.

8.22.11 In response to requests from stakeholders, and as part of its work towards preparing an application, the Applicant committed to the following:

- Development of an Airport Surface Access Strategy to encourage staff and passengers to use sustainable travel modes where possible.
- Development of a Carbon Action Plan to describe the actions the Applicant would take to reduce carbon impacts with its control.

- Preparation of further preliminary environmental information to support an additional subsequent consultation relating to the highway improvement changes.
- Refinements to predictions of future demand for hotels and office space.
- Further development of the Project proposals, including in relation to landscape and ecology; a reduction in the amount of land required for flood compensation areas and surface water drainage ponds; and the identification of a preferred CARE facility location – the option closest to the terminals, to the north of the cargo hall.
- Ongoing engagement with stakeholders, including the establishment of a Noise Envelope Group to support continued work on the proposal to set limits on noise from future operations at Gatwick Airport.

8.22.12 Key outcomes of the Summer 2022 consultation are as follows:

- 573 responses received;
- Over 2,600 newsletters delivered to homes and businesses in the targeted consultation area;
- 18,184 people visiting the Project web pages, with these pages viewed a total of 33,267 times. Around a quarter of visitors (4,521) - with tracking cookies enabled - opened the consultation documents and 467 people clicked out to the online questionnaire;
- 2,795 views of the consultation videos;
- 5 virtual stakeholder briefings and 10 local authority topic working groups; and
- 7 bookings for 'call the expert' telephone surgeries.

8.22.13 In response to the feedback from the Summer 2022 consultation, the following changes were made to the Project:

- **Road improvements:**
  - Landscaping – preliminary landscape proposals have been developed, with comments from National Highways incorporated into the design. Detailed landscape proposals will be agreed in consultation with the relevant authorities should the DCO be granted.
  - A23 – proposals for a noise barrier between the A23 London Road and Riverside Garden Park have been removed from the Project.
- **Active travel:**
  - South terminal access – the highway proposals now include enhancements to active travel infrastructure, including a connection between Balcombe Road and South Terminal.
  - A shared pedestrian and cycle path proposed between the Longbridge Roundabout to the North Terminal Roundabout was amended to a segregated pedestrian and cycle path along the southern side of the A23 London Road, crossing and then following the River Mole for a short distance before connecting to Perimeter Road North and Longbridge Way.
  - Signalised pedestrian and cycle crossings on all arms of the Longbridge roundabout.
  - A signalised pedestrian crossing on the west side of the new A23/North Terminal junction.

- **Unauthorised car parking:** the proposals no longer include provision on the Airport to reprovide off-airport unauthorised parking lost as a result of local authority enforcement.

- **Car parking (green spaces):** new green space has been created with the proposed removal of Car Park B. There are no longer any proposals for new car parks on green space.

8.22.14 Furthermore, in response to requests from stakeholders, and as part of its work towards preparing an application, the Applicant has undertaken the following:

- **Economic benefit:**
  - Revised analysis taking consultation feedback into account - particularly in relation to job multipliers and catalytic impacts - was undertaken and is included in the Environmental Statement accompanying the DCO Application.
  - Economic impact estimates for a scenario that assumes slower/lower passenger growth at Gatwick Airport are included in the assessment to show the effect of lower levels of demand on economic impacts.

- **Housing:**
  - Additional analysis has been undertaken to assess the potential need for affordable housing associated with the Project's operational employment. This includes analysis of how the potential affordable housing demands of the Project compare with recent delivery of affordable housing, local evidence of current affordable housing need, local plan policies for affordable housing and pipeline supply.
  - The Population and Housing Report includes an assessment of the potential demand for housing during the construction phase, including looking at capacity within the private rented sector and other forms of short-term/temporary accommodation.

- **Climate costs and carbon values:** the latest carbon values (used by Government) have been used in the Economic Impact Assessment for the DCO submission.

- **Emissions:** The Project's Carbon Action Plan includes details of how the Applicant will seek to influence third parties (that it does not have control over) such as airlines, customer behaviour and government agencies under Scope 3 to reduce their emissions.

- **CARE facility effects:** the pollutants assessed in the Environmental Statement have been widened to take into account all pollutants which could result in a significant impact, including those from the CARE facility.

- **Mode share:** further analysis has been undertaken to inform the mode share commitments. Proposals for monitoring travel behaviour and progress on mode shares, through an annual monitoring and reporting process and engagement with the Gatwick Airport Transport Forum Steering Group, have been developed as part of the Surface Access Commitments also now included.

8.22.15 The pre-application consultation that has been carried out on the Project is therefore

considered to be in accordance with legislation and national policy regarding community engagement.

9 Planning Balance and Conclusions

9.1.1 The approach to decision making in this case is, perhaps, made unusual by the fact that the primary element of the application (the expansion of Gatwick Airport), is not subject to an NPS which has formal effect and, consequently, falls to be determined under Section 105 of the Act. The secondary component of the application, however, (the highway works proposed to support that expansion) is the subject of the NNNPS and falls to be determined under Section 104.

9.1.2 Nevertheless, the decision making process is assisted by the following:

- whilst the ANPS does not have formal effect for the proposals, the ANPS itself makes clear (at paragraph 1.41) that it will be an important and relevant consideration in the determination of an application such as this;
- policy for national networks recognises its relationship with policies for airports. The NNNPS states that there is a compelling need for development of the national networks for a number of reasons, including the need to improve integration with airports, i.e., to provide the critical links between cities, communities and our major airports (paragraphs 2.8, 2.10 and 2.13).
- national planning policy in the NPPF requires planning authorities to recognise any large-scale transport facilities be located in their area and provide the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy (paragraph 106).
- both the ANPS and the NNNPS set out detailed policies to enable the consideration of applications for NSIPs. Those policies are provided topic by topic and have been assessed in this Planning Statement. Whilst the policy wording varies for some topics, the principles and objectives of the policies are aligned.

9.1.3 Whilst formal determination of the highways element of the proposals must take place against the requirements of Section 104, it is appropriate to use the policy framework of the ANPS as the primary framework against which the Project as a whole should be tested given its relationship to the core aspect of the Project application – the expansion of Gatwick Airport. .

9.1.4 In fact, the Government has a suite of aviation policies, all of which are important and relevant to the application. The starting point, therefore, is national aviation policy.[82]

Aviation Policy

9.1.5 Aviation Policy has been extensively reviewed in this Planning Statement and also in the Applicant's **Needs Case** (Doc Ref 7.2) and is not repeated at length here. It is important to recognise, however, that Government policy is strongly supportive of the growth of the aviation sector in view of its importance to a number of national objectives, including international connectivity and the strength of the national economy. The most up-to-date expressions of government policy confirm that the Government is committed to growth and will work closely with the industry to continually assess how best government can support sustainable recovery and a bright future for UK aviation. Airports are said to be part of the UK's thriving and competitive

[82] Whilst local planning policies can also be important and relevant, those policies in this case recognise the primacy of Government policy.

aviation sector and play a critical role in boosting both global and domestic connectivity.[83]

9.1.6 For well over a decade, the Government has proactively put in place a policy framework aimed at enabling airports to expand their operations to meet the acknowledged and growing shortage of capacity.

9.1.7 Government policies support making the best use of existing airport infrastructure in recognition of the long-term capacity problems which particularly face aviation in London and the South East. The ANPS recognises that the current capacity challenges "*create negative impacts on the UK through increased risk of flight delays and unreliability, restricted scope before competition and lower fares, declining domestic connectivity, erosion of the UK's hub status, relative to foreign competitors and constraining the scope of the aviation sector to deliver wider economic benefits*."[84]

9.1.8 The Project benefits directly from the strength and consistency of that Government policy support. That support is not diminished by other national priorities such as the Government's commitment to achieve Net Zero by 2050. In fact, the Government's Jet Zero Strategy makes clear that meeting the twin challenges of supporting the growth of the aviation sector and limiting carbon emissions is of vital importance to the UK's connectivity and growth. The Jet Zero Strategy explains that the Government is committed to meeting that challenge and enabling the recovery of the aviation sector and that the Government remains committed to growth in the sector.[85]

9.1.9 As this Planning Statement has examined and made clear, the Government does not consider it necessary to limit aviation growth in order to meet its carbon reduction obligations. Indeed, the Jet Zero Strategy is explicit that the Government's pre-existing aviation policies remain robust and fit for purpose. The Jet Zero Strategy is clear that the Government's updated understanding of the capacity for growth of UK airports (which includes the third runway at Heathrow and this Project) can be developed and operated consistent with the planned trajectory for achieving net zero emissions by 2050.[86]

9.1.10 In principle, therefore, the Project benefits from particularly strong, up to date and direct Government policy support.

9.1.11 This applies not only to the aviation component of the Project but also to the highway works which support it, for which the NNNPS establishes an in principle need.[87]

9.1.12 Policy, of course, is only a starting point, although the strength of the Government's policy support provides an important platform for the application. It is necessary, however, to examine the detail of the Project against the detail of the policies and all other matters which may be important and relevant and that has been the purpose of this Planning Statement.

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[83] Flightpath to the Future pages 19 and 26 - https://www.gov.uk/government/publications/flightpath-to-the-future-a-strategic-framework-for-the-aviation-sector

[84] ANPS paragraph 2.10 - https://www.gov.uk/government/publications/airports-national-policy-statement

[85] Jet Zero Strategy page 7 and paragraph 3.56 - https://www.gov.uk/government/publications/jet-zero-strategy-delivering-net-zero-aviation-by-2050

[86] Jet Zero Strategy, paragraph 3.57 and Jet Zero Modelling Framework paragraph 3.18. In August 2022 in the most recent decision on an airport DCO at Manston, the Secretary of State confirmed that the government's decarbonisation targets for the sector can be met without directly limiting aviation demand (Manston decision letter paragraph 149) - https://www.gov.uk/government/publications/jet-zero-strategy-delivering-net-zero-aviation-by-2050

[87] NNNPS paragraph 2.15 - https://www.gov.uk/government/publications/national-policy-statement-for-national-networks

Benefits

9.1.13 The benefits of the Project include making a material contribution towards meeting the identified need for aviation capacity in London and the south-east. These are benefits of national importance. Questions of need are explored in detail in the **Needs Case** (Doc Ref. 7.2) and summarised in Section 3 of this Planning Statement, but the primary position is relatively simply stated.

9.1.14 As the ANPS and the work of the Airport's Commission confirmed, Gatwick is "full" at peak times, which is unsurprising given that its existing runway is the busiest single daytime runway in the world. Gatwick serves more destinations than any other UK airport: it is a national asset of strategic importance to the UK and the largest economic driver in its extensive sub-region.

9.1.15 The evidence shows that the existing demand from airlines outstrips available capacity, whilst the airport lacks the resilience of a dual runway airport and is operationally constrained. These are characteristics of the busiest UK airports which the ANPS explains are not in the national interest and which it is important to overcome.[88]

9.1.16 Gatwick is keenly aware of the demand for more capacity at the airport, an awareness which is enhanced by government forecasts of continuing growth in the aviation sector – growth which is already outstripping the capacity of airports in London and the south-east.

9.1.17 Even if it was appropriate to assume the development of other aviation capacity (for example at Luton and Heathrow), that capacity is unlikely to come on stream before the mid to late 2030s, whereas the NRP can be open by 2029 and is uniquely able to make a significant contribution to UK aviation demand in the relatively short term.

9.1.18 The Secretary of State has made it clear in the decision at Manston Airport, however, that it would not be appropriate to assume that other airport proposals are brought forward, that they are necessarily consented or that they are necessarily developed and operated.[89] In these circumstances, substantial weight attaches to the ability of the Project to contribute meaningfully towards meeting national need as well as meeting the immediate demand at Gatwick. Weight also attaches to the project's ability to provide the resilience and operational benefits set out in the Needs Case, the realisation of which are directly consistent with objectives of Government policy.

9.1.19 The economic benefits of the project are substantial. They are set out fully in **ES Chapter 17: Socio-Economics** (Doc. Ref. 5.1) and summarised in Section 3.6 of this Planning Statement. By the time the runway is fully operational in 2032, it is estimated that the NRP would create an increase in employment of 14,000 jobs and create an extra £1 billion in GVA across the 6 local authorities area. The benefits are nationally important but also directly consistent with the role of Gatwick Airport as a regional driver of economic growth. Substantial weight attaches to these exceptional benefits.

9.1.20 Beyond the macro benefits of the Project, the Application proposals have been carefully designed

[88] ANPS paragraphs 2.10-2.15 - https://www.gov.uk/government/publications/airports-national-policy-statement
[89] Manston Decision Letter paragraphs 97 and 102 - https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-006369-220818%20-%20Manston%20Airport%20PA08%20Decision%20Letter.pdf

to mitigate their impacts but also to generate additional benefits through the development and operation of the Project. These are examined further below where the principal relative benefits and impacts of the Project are considered against the relevant policy framework.

Assessment

9.1.21 A particular characteristic of the Project is its sustainable approach to generating new runway capacity. Whilst the construction of a full new runway in the south-east in other circumstances may involve substantial land take with extensive property and environmental effects, the NRP project involves the relatively minor relocation of the existing standby northern runway; moving the runway 12 metres to the north in order to achieve a sufficient spacing of the northern runway from the main runway to enable dual runway operations. As a result, the proposed airfield works are contained very substantially within the existing airport boundary and the principal external physical effects of the proposal arise through the highway works necessary to enhance capacity and connectivity to serve the airport and to address existing capacity constraints.

9.1.22 Against this important background, the application documents explain how the proposals have emerged through the careful testing of options in order to limit environmental effects and through close engagement and consultation which have helped to further refine the Project. The overall consequence of this approach is that the project has been assessed to have relatively limited environmental impacts. The tables in **ES Chapter 21: Summary of Effects** (Doc Ref. 5.1) summarise impacts by topic through the different stages of the Project. .

9.1.23 Each of these matters is explored in more detail in the topic by topic analysis set out in Section 8 of this Planning Statement and it would not be helpful to repeat that analysis here.

9.1.24 The significance of the residual impacts, of course, should not be understated. Neither, however, should the significance of the benefits that arise from the Project. These include:

- substantial social economic benefits, including the benefits of employment, skills and training as well as the widespread benefits to the regional and national economy.
  The ANPS confirms the importance of aviation in supporting the national economy, whilst the NNPS (at paragraph 2.5) sets out the need for the strategic road network to support national and local economic growth. The NPPF (at paragraph 81) requires significant weight to be given to the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

- The highway works generate significant benefits for the local road network compared with a future without those highway works. In that future, airport operations would continue to grow, albeit to a lesser extent and the analysis set out in the Transport Assessment makes clear that this growth, combined with wider forecast growth, would lead to congestion issues on the strategic road network. These congestion issues would be resolved by the net effect of the Project's highway improvement works.

  Additionally, the project invests significantly in enhancements in active travel and accessibility and commits to further improvements against an already high baseline in public transport connectivity to the airport. These enhancements, of course, provide significant benefit to all users of the airport, not just those served by the Project.

Funds are provided to enforce against off airport and local fly parking which is known to have been a persistent issue.

- Whilst the application proposals involve the loss of woodland and habitats, the short term significant adverse effects become longer term significant beneficial effects as the replacement habitats, planting and improvements to the River Mole mature. GAL has worked hard to optimise the Project's landscaping and habitat strategy such that the proposals achieve greater than a 20% biodiversity net gain.

- The Environmental Statement reports significant benefits to water quality, through a range of measures, including those which naturalise sections of the River Mole and enhance de-icing infrastructure at the Airport.

9.1.25 Notably, as the tables show in **ES Chapter 21** (Doc. Ref 5.1), the range of mitigation proposals is effective at limiting impacts and, in a number of topic areas as the mitigation matures, short term adverse effects become longer term beneficial effects on the landscape, bio-diversity and the water environment.

9.1.26 In terms of carbon emissions, Gatwick has a leading track record in achieving carbon reduction accreditation. The **Carbon Action Plan (CAP) (ES Appendix 5.4.2)** (Doc. Ref. 5.3) submitted with the application is an exceptional commitment from an airport playing its full part in a low carbon future. GAL has made clear that the CAP would be implemented whether or not the Project goes ahead. By doing so, GAL is demonstrating its significant commitment to carbon reduction and elevating the status of its carbon reduction strategy to binding commitments, as part of the DCO. Through the CAP and its Surface Access commitments GAL is demonstrating its commitment to a sustainable future – and its compliance with planning policy, the expectations of which are exceeded by the terms of the CAP.

9.1.27 The Environmental Statement concludes that there is no significant impact arising from greenhouse gas emissions generated by the project, for reasons which are fully set out in **ES Chapter 16: Greenhouse Gases** (Doc Ref. 5.1). GAL is aware that this issue is controversial amongst some objectors to the Project but it is important to distinguish between criticisms of government policy and objections to this development. It should be recognised that, whilst the airport must play its part, GHG emissions from aviation and road transport are primarily the responsibility of the Government and it is the Government which is obliged to meet the commitments it has made to carbon reduction and to net zero by 2050 in the Climate Change Act.

9.1.28 These issues were the subject of debate at the proposals for the expansion of aviation activity at Bristol Airport, which was the subject of a decision from joint planning Inspectors in February 2022.[90] Objectors in that case were concerned that expansion of the airport would create an increase in GHG emissions contrary to national objectives to limit climate change. The Inspectors recognised, however, that these matters were the subject of other controls and that the NPPF requires decision makers to assume that other regulatory regimes will be effective (Decision Letter paragraph 154). The Inspectors recognised that the Climate Change Act places a duty on the Secretary of State, not on local decision makers (paragraph 159) and that the

[90] Appeal Decision APP/D0121/W/20/3259234 - https://acp.planninginspectorate.gov.uk/ViewDocument.aspx?fileid=46076498

decision maker in that case should assume that the Secretary of State will comply with his legal duties under the Climate Change Act (paragraph 213).

9.1.29 The Government's Jet Zero Strategy and its Transport Decarbonisation Plan set out a series of market mechanisms and other measures to ensure that the Government's climate change obligations are met, and the Government's own analysis has demonstrated the consistency of airport expansion with that policy and those measures.[91]

9.1.30 The noise effects of construction, aviation and traffic have been closely examined in **ES Chapter 14: Noise and Vibration** (Doc Ref 5.1).

9.1.31 In relation to construction, the ES identifies that approximately 37 properties may be subject to moderate adverse, significant environmental effects for short term periods during the construction of the Project. The **Code of Construction Practice** in **ES Appendix 5.3.2** (Doc Ref. 5.3) commits to a process of developing specific mitigation proposals in advance of specific phases of construction activity and agreeing these with the local authority as the best practical means of limiting noise. With this level of detailed attention, it is anticipated that the level of adverse impacts would reduce further.

9.1.32 Aviation noise is considered against the background of Gatwick's considerable progress in limiting the noise impacts of operation at the airport. In the noisiest assessment year (2032) the increase in the number of people forecast to be affected at the daytime LOAEL is between 2,700 and 2,900, against a base of 16,100 to 23,50000. Of those affected during the day and night, 61-68% and 97-99% would be affected by an increase of less than 1dB. By 2038, forecast reductions in aviation noise compared to 2019 would see reductions of population within the day and night LOAELs of 4,850-7,550 and 5,950-9,350 respectively depending on the rate of fleet transition to quieter aircraft types.

9.1.33 The number of people more significantly affected, i.e., with noise levels above SOAEL is forecast to increase from a base of 900-1,100 properties by approximately 80 properties, when those affected in the daytime and night-time are added together.

9.1.34 All properties within the SOAEL contours (63dB by day and 55 dB by night) would fall within the newly defined Inner Zone for the purposes of noise insulation and qualify for an enhanced package of noise insulation proposed as part of the Project, which exceeds the quality of packages offered at other airports and exceeds Government policy expectations.

9.1.35 New bunding and noise barriers are proposed as part of the Project to limit the effects of ground noise and would be substantially effective in limiting significant effects. Nevertheless, localised significant effects are predicted at 37 properties, which again would benefit from the enhanced Noise Insulation Scheme.

9.1.36 No significant adverse effects are forecast from the highway works proposed as part of the Project.

9.1.37 In total, the noise effects are significant and classified as moderate adverse in the Environmental

[91] In his Decision Letter on Manston Airport in 18 August 2022 at paragraph 150, the Secretary of State concluded for similar reasons that climate change is a matter that should be afforded neutral weight in the planning balance - https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020002/TR020002-006369-220818%20-%20Manston%20Airport%20PA08%20Decision%20Letter.pdf

Statement. It would be fair to recognise, however, that they are notably limited in scale given the nature of the Project.

9.1.38 The assessment concludes that the policy requirements set out at paragraph 5.68 of the ANPS and 5.195 of the NNNPS are met.

9.1.39 The residual impacts are significant for those affected but nevertheless relatively limited in scale and they should be seen in the context of the Government's most recent Overarching Aviation Noise Policy[92], which explains that:

> "*An overall reduction in total adverse effects is desirable, but in the context of sustainable growth an increase in total adverse effects may be off-set by an increase in economic and consumer benefits*."

The Planning Balance

9.1.40 The Project includes elements of development which fall within the definition of a "project" in Sections 14(1)(h)(highway-related development) and (i)(airport-related development) of the Act, as confirmed by section 22(1)(b), (3) and (4)(b), and section 23(1)(b), (4) and (5)(a) respectively.

9.1.41 Section 104 of the Act applies to decisions in cases where a National Policy Statement ("NPS") has effect in relation to the development of the description to which the application relates. This is the case with the highway works element of the Project. Section 104(2) provides that, in deciding the application, the Secretary of State must have regard, amongst other things, to any other matters which he thinks are both important and relevant to the decision. Section 104(3) provides that the Secretary of State must decide an application in accordance with any relevant NPS other than where certain exceptions set out in subsections (4) to (8) apply, namely, where doing so would lead to the United Kingdom being in breach of its international obligations, or lead to the Secretary of State being in breach of any duty imposed on him by or under any enactment, or where the Secretary of State decides that doing so would be unlawful by virtue of any enactment, or where the Secretary of State is satisfied that the adverse impact of the proposed development would outweigh its benefits.

9.1.42 Section 105 of the Act applies to decisions in relation to applications to which Section 104 does not apply (i.e. where there is no NPS which has effect). This is the case with the airfield element of the Project. There is an Airports NPS (ANPS) which does not "have effect" for the purposes of Section 104 in this case; however section 105(2) provides that in deciding the application the Secretary of State must have regard, amongst other things, to any other matters that he thinks are both important and relevant to the decision. The ANPS is an important and relevant matter for this purpose. The ANPS anticipates that airport development proposals may involve surface access development and have impacts beyond the airport itself; and it requires the assessment of potential impacts on matters including surface access and its associated noise, air quality and carbon emissions. It also provides for assessment against wider land use principles that can be applied generally to proposals involving airport-related development as well as other development that is brought forward within the same project It is therefore appropriate to assess the Project as a whole against this policy framework, notwithstanding that the highways element of the

[92] https://www.gov.uk/government/publications/aviation-noise-policy-statement/overarching-aviation-noise-policy

proposals must be determined formally against the requirements of Section 104. This reflects the primary function of the application for development consent which is to provide for the airport-related development of Gatwick Airport.

9.1.43 For the reasons set out above, the Project would comply with the relevant aspects of the ANPS and would generate substantial benefits that outweigh the adverse impacts that have been identified in the application.

9.1.44 The highways-related development would be consistent with the principles set out in the National Networks NPS for the purposes of section 104 of the Act. It would not lead the UK to being in breach of any international obligations (the Applicant has in particular assessed GHG emissions against UK carbon commitments, which are the means for the UK to achieve compliance with its international obligations relating to climate change). It would not lead to conflict with any duty imposed by an enactment. It would also accord with relevant aspects of the ANPS as an important and relevant matter for the decision. In relation to the balancing of adverse effects and benefits, the National Networks NPS advises that the Secretary of State will take into account the potential benefits of the proposals, including the facilitation of economic development and any wider benefits, as well as potential adverse impacts including cumulative adverse impacts.[93] The balancing exercise confirms that the benefits substantially outweigh the adverse effects in this case.

[93] This approach reflects paragraph 4.4 of the Airports NPS which is to similar effect.

Glossary

Term	Description
AAIB	Air Accidents Investigation Branch
ABAGO	Airport Buildings and Ground Operations
ACL	Airport Coordination Limited
AEP	Annual Exceedance Probability
AGL	Above Ground Level
ALC	Agricultural Land Classification
AOD	Above Ordnance Datum
AONB	Area of Outstanding Natural Beauty
APF	Aviation Policy Framework
APU	Auxiliary Power Units
AMR(s)	Annual Monitoring Report(s)
ANPS	Airports National Policy Statement
AQAP	Air Quality Action Plan
AQMA	Air Quality Management Area
ARP	Adaptation Reporting Power
ASAS	Airport Surface Access Strategy
ATM or ATMs	Air Traffic Movement(s): Commercial landings or take-offs of aircraft engaged in the transport of passengers, freight or mail on commercial terms (i.e. scheduled, charter and dedicated freighter flights)
BA	British Airways
BAA	British Airports Authority
BAP	Biodiversity Action Plan
BGS	British Geological Survey
BOA	Biodiversity Opportunity Area
BPM	Best Practicable Means
BSI	British Standards Institute
CAA	Civil Aviation Authority
CAP	Carbon Action Plan
CAP1616	CAA Airspace Change: Guidance on the regulatory process for changing the notified airspace design and planned and permanent redistribution of air traffic, and on providing airspace information
CARE	Central Area Recycling Enclosure facility
CBC	Crawley Borough Council
CCAR	Climate Change Adaptation Report
CCAs	Climate Change Allowances
CCC	Committee on Climate Change
CCD	Climb Cruised Descent
CCR	Climate Change Resilience
CEA	Cumulative Effects Assessment
CH4	Methane
CIP	Capital Investment Programme

Term	Description
CIRIA	Construction Industry Research and Information Association
CITB	Construction Industry Training Board
CO	Carbon Monoxide
CO2	Carbon dioxide
CoCP	Code of Construction Practice
CoP	Code of Practice
CoPA	Control of Pollution Act
CORSIA	Carbon Offsetting and Reduction Scheme for International Aviation
COVID	Coronavirus
CRoW	Countryside and Rights of Way
CTMP	Construction Traffic Management Plan
CWRMP	Construction Waste and Resources Management Plan
DAS	Design and Access Statement
dB	Decibel
DCLG	Department for Communities and Local Government
DCO	Development Consent Order
DE&I	Diversity, Equity & Inclusion
DEFRA	Department for Environment, Food and Rural Affairs
DfT	Department for Transport
DLUHC	Department for Levelling Up, Housing and Communities
DMP	Dust Management Plan
DMRB	Design Manual for Roads and Bridges
EA	Environment Agency
EASA	European Aviation Safety Agency
EAT	End around taxiway
EIA	Environmental Impact Assessment
eILS	Enhanced Instrument Landing System
EMF	Electromagnetic field
EPA	Environmental Protection Act
ERCD	Environmental Research and Consultancy Department
ES	Environmental Statement
ESBS	Employment, Skills and Business Strategy
ETS	Employment and Training Strategy
EU	European Union
FASI	Future Airspace Strategy Implementation
FCA	Flood Compensation Area
FDI	Foreign Direct Investment
FRA	Flood Risk Assessment
FPT	Flight Performance Team
FTE	Full Time Equivalent
GAL	Gatwick Airport Limited
GACT	Gatwick Airport Community Trust
GASHco	Gatwick Airport Storage and Hydrant Company

Term	Description
GATCOM	Gatwick Airport Consultative Committee
GDLSS	Gatwick Diamond Local Strategic Statement
GDP	Gross Domestic Product
GCN	Great Crested Newt
GHG	Greenhouse Gas
GIP	Global Infrastructure Partners
GIS	Geographical Information System
GNMG	Gatwick Noise Monitoring Group
GLVIA	Guidelines for Landscape and Visual Impact Assessment
GOG	Gatwick Officers Group
GPU	Ground Power Unit
GSE	Ground Support Equipment
GVA	Gross Value Added
GWDTE	Groundwater Dependent Terrestrial Ecosystem
HER	Historic Environment Records
HFCs	Hydrofluorocarbons
HGV	Heavy Goods Vehicle
HIA	Health Impact Assessment
HRA	Habitats Regulations Assessment
IA	Independent Assessor
ICAO	International Civil Aviation Organization
ICCI	In-combination Climate Change Impacts
ICS	Integrated Care System
ICW	International Catering Waste
IDL	International Departure Lounge
IEMA	Institute of Environmental Management and Assessment
ILS	Instrument Landing System
IMD	Indices of Multiple Deprivation
ITTS	Inter Terminal Transit System (or Shuttle)
LAeq, 16 hours	The LAeq over the daytime and evening period 07:00 to 23:00 hours, for aircraft noise for an average summer day between 16 June and 15 September. In this report all noise levels are A-weighted and in places the A is omitted for simplicity written Leq, 16 hour
LAeq, 8 hours	The LAeq over the night period 23:00 to 07:00 hours, for aircraft noise for an average summer night between 16 June and 15 September. In this report all noise levels are A-weighted and in places the A is omitted for simplicity written Leq, 8 hour
LAeq, T - Equivalent Continuous Sound Level	The LAeq level gives a single figure to describe a sound that varies over a given time period, T. It is the A-weighted steady sound level that would result in the same sound energy at the receiver as occurred in practice with the varying level. It is derived from the logarithmic summation of the sound signal and so unlike a conventional (linear) average it gives additional weighting to higher levels.

Term	Description
LCC(s)	Low Cost Carrier
LCWIP	Local Cycling and Walking Infrastructure Plan
LEMP	Landscape and Ecology Management Plan
LEP	Local Enterprise Partnership
LERL	Land East of the Railway Line
LGS	Local Geological Site
LIR	Local Impact Report
LLFA	Lead Local Flood Authority
Lmax	The Lmax s is the highest value of the sound level over the specified period. It is sometimes referred to as 'peak' noise level. However, the term 'peak' has aspecial meaning in acoustics and the expression 'maximum' is preferable to avoid confusion. The 's' stands for slow response, which is the metric usually used for aircraft noise. In this report all Lmax levels are A-weighted.
LNR	Local Nature Reserve
LOAEL	Lowest Observed Adverse Effect Level
LSS	Local Strategic Statement
LTO	Landing and Take-off
LTP	Local Transport Plan
LTVIA	Landscape and Townscape Visual Impact Assessment
LWS	Local Wildlife Site
MBBR	Moving Bed Biofilm Reactor
mbgl	Metres below ground level
mbu	Making best use
MHCLG	Ministry of Housing, Communities and Local Government
MMP	Materials Management Plan
MPA	Mineral Planning Authority
mppa	million passengers per annum
MRF	Materials Recovery Facility
MSA	Mineral Safeguarding Area
MSCP	Multi-storey car park
MtCO2e	million tonnes of carbon dioxide equivalent
N2O	Nitrous Oxide
N60 night	Numbers of aircraft during an average summer night above Lmax 60 dB
N65 day	Numbers of aircraft during an average summer day above Lmax 65 dB
NATMs	Non-Commercial Air Traffic Movements: Landings or take-offs of aircraft movements, excluding ATMs. Includes positioning flights by commercial operators, business aviation and recreational / military flights
NaTMAG	Noise and Track Monitoring Advisory Group
NATS	National Air Traffic Services
NCA	National Character Area
NCR	National Cycle Route
NDL	North Downs Line

Term	Description
NERL	NATS En Route
NESCOT	North East Surrey College of Technology
Net Zero	Net zero refers to a state in which the greenhouse gases going into the atmosphere are balanced by removal out of the atmosphere
NF3	Nitrogen Trifluoride
NH3	Ammonia
NHS	National Health Service
NIS	Noise Insulation Scheme
NMB	Noise Management Board
NNNPS	National Networks National Policy Statement
NNR	National Nature Reserve
NO2	Nitrogen dioxide
NOEL	No Observed Effect Level
NOx	Nitrogen oxides
NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance
NPR	Noise Preferential Route
NPS	National Policy Statement
NPSE	Noise Policy Statement for England
NPSNN	National Policy Statement for National Networks
NPV	Net Present Value
NRP	Northern Runway Project
NQP	Night Quota Period
NSAfC	National Skills Academy for Construction
NSIP	Nationally Significant Infrastructure Project
NSR	Noise Sensitive Receptor
NTS	Non-Technical Summary
NVZ	Nitrate Vulnerable Zone
NWZ	North West Zone
OCTMP	Outline Construction Traffic Management Plan
OCWTP	Outline Construction Workforce Travel Plan
ODPM	Office of the Deputy Prime Minister
OESBS	Outline Employment, Skills and Business Strategy
OLEMP	Outline Landscape and Ecology Management Plan
ONS	Office for National Statistics
OS	Ordnance Survey
Overflight	An aircraft overflying a receptor on the ground at a height of less than 7,000 ft above the ground and at an angle of at least 48.5 degrees from the horizontal, as defined by CAP1498
PEIR	Preliminary Environmental Information Report
PFSs	Perfluorocarbons
PINS	Planning Inspectorate
PM10 and PM2.5	Particulate matter

Term	Description
PPCE	Probabilistic Projections of Climate Extreemes
PRA	Preliminary Risk Assessment
PRoW	Public Right of Way
PS	Pumping Station
PSZ	Public Safety Zone
PTAR	Preliminary Transport Assessment Report
RBBC	Reigate and Banstead Borough Council
RET	Rapid Exit Taxiway
RoFSW	Risk of Flooding from Surface Water
SAC	Special Area of Conservation
SACs	Surface Access Commitments
SAF	Sustainable Aviation Fuel
SASH	Surrey and Sussex Healthcare NHS Trust
SATURN	Simulation and Assignment of Traffic to Urban Road Networks
SCC	Surrey County Council
SEP	Strategic Economic Plan
SERTM	South East Regional Transport Model
SESW	Sutton and East Surrey Water
SgZ	Safeguard Zone
SF6	Sulfur Hexafluoride
SFRA	Strategic Flood Risk Assessment
SMEs	Small and medium-sized enterprises
SMS	Soil Management Strategy
SNCI	Site of Nature Conservation Importance
SO2	Sulphur dioxide
SOAEL	Significant Observed Adverse Effect Level
SoCC	Statement of Community Consultation
SoS	Secretary of State
SPA	Special Protection Area
SPD	Supplementary Planning Document
SRN	Strategic Road Network
SSSI	Site of Special Scientific Interest
STEM	Science, Technology, Engineering and Mathematics
STW	Sewage Treatment Works
SuDS	Sustainable Drainage Systems
SWMP	Surface Water Management Plan
SWMP	Site Waste Management Plan
TA	Transport Assessment
TAMs	Total Aircraft Movements = ATMs and NATMs
TDP	Transport Decarbonisation Plan
TfL	Transport for London
TW	Thames Water
TWG(s)	Topic Working Group(s)

Term	Description
UFP	Ultra-fine particulates
UK	United Kingdom
UKCP	UK Climate Projections
UKCP	United Kingdom Climate Predictions (2009 and 2018)
UKCP18	UK Climate Predictions 2018
UXO	Unexploded Ordnance
VOC	Volatile Organic Compounds
WCA	Wildlife and Countryside Act
WebTAG	Web based Transport Appraisal Guidance: https://www.gov.uk/guidance/transport-analysis-guidance-webtag\
WFD	Water Framework Directive
WHO	World Health Organization
WMP	Waste Management Plan
WSI	Written Scheme of Investigation
WSTP	West Sussex Transport Plan
WSCC	West Sussex County Council
ZEF	Zero Emissions Flight
ZoI	Zone of Influence
ZTV	Zone of Theoretical Visibility