

The Planning Inspectorate  
National Infrastructure Applications Team  
Temple Quay House  
Temple Quay  
Bristol  
BS1 6PN

FAO: Kevin Gleeson (Lead Member of the Examining Authority)

15 September 2023

Dear Mr Gleeson,

**Application for a development consent order by Gatwick Airport Limited for the Gatwick Airport Northern Runway project (Ref. TR020005) – Response to Procedural Decisions made by the Examining Authority under section 89(3) of the Planning Act 2008**

Thank you for your Procedural Decision letter of 8 September 2023. In responding to it we have retained the subject headings from your letter.

**Local Authorities Issues Trackers**

As requested, we enclose at **Annex A1** a copy of our letter and the accompanying Issues Tracker(s) issued to the Joint Local Authorities (JLA) on the 18 August 2023, as referred to in the relevant part of our response to the section 51 advice dated 24 August 2023 [\[AS-001\]](#). We have also included at **Annex A2** and **Annex A3** the subsequent correspondence between ourselves and the JLA Steering Group Chair which followed the submission of the Issues Tracker(s) on 18 August, and which records how it is proposed that the Issues Tracker(s) will inform the JLA relevant representations, and then the development of the Statements of Common Ground (SoCGs) and Principal Areas of Disagreement Summary Statements (PADSS).

In summary, the proposed approach is:

- GAL to consolidate all issues from the four Issues Trackers into a single list and indicate, for each issue, in which thematic part or parts of the SoCG this issue should be recorded and where in the application documents the relevant supporting information can be found. This work is under way.
- JLA to revert to GAL (agreed to be by 18 September) and highlight any additional key issues they identify as being necessary to record in the consolidated issues tracker. GAL will then return the updated tracker to the JLA to be available during the finalisation of their relevant representations and PADSS.
- GAL to add to the consolidated tracker any issues proposed by the JLA arising from the development of their Relevant Reps and PADSS.
- GAL to subsequently discuss with the JLA how to incorporate the issues on this final version of the consolidated issues tracker into a single SoCG (categorising issues thematically for ease of reference) between GAL and the ten authorities in the JLA. Templates for each of the themed sections of this proposed SoCG were initially issued in two tranches in April and June 2023 to the JLA by GAL, and will be supplemented by additional material from the agreed consolidated tracker. We have also included at **Annex B** a document outlining the proposed approach to producing the thematic SoCG, originally shared in April 2023 with the JLA.

**Statements of Common Ground**

We enclose at **Annex C** the list of proposed parties with whom SoCGs will be sought and will update the Examining Authority before 29 October on progress on these as requested.

**Noise Insulation Scheme Boundary**

We enclose a new application document **Ordnance Survey Base Map Identifying Category 3 Boundary and Noise Insulation Scheme Boundary** (Doc Ref. 8.2) showing the proposed Inner Zone and Outer Zone Noise Insulation Scheme boundaries on the same plan as the Category 3 boundary.

To clarify, the Air Noise Insulation Scheme (NIS) zones are separate and distinct from the Category 3 boundary used for the land referencing exercise.

The NIS responds to Government policy objectives for airport operators to consider financial assistance towards acoustic insulation for households and to identify where mitigation is required to avoid significant effects to health and quality of life from aviation noise. Outer and Inner zones are defined with the highest level of sound insulation provided in the Inner zone - i.e. for those most affected. The noise changes associated with the introduction of the Northern Runway into operation will be subtle in many areas of the Outer zone scheme furthest from the airport. ES Appendix 14.9.10: Noise Insulation Scheme [\[APP-180\]](#) provides the full context to the development of the NIS in support of the DCO Application.

By contrast, the Category 3 boundary has been set conservatively to identify those persons who GAL thinks that, if the Project were to be delivered, would or might be entitled to make a 'relevant claim' (as required by and defined under section 44(4) and (6) of the Planning Act 2008) arising out of the proposed Application. Paragraphs 7.2.2 to 7.2.7 of the Statement of Reasons [\[AS-008\]](#) explains the precautionary approach followed to derive the Category 3 boundary, including the use of an air noise contour, which is significantly larger than the area in which significant noise effects are predicted to occur and, by consequence, which are subject to the mitigation provided by the NIS (paragraph 7.2.6 of the Statement of Reasons [\[AS-008\]](#)).

**ES Appendix 14.9.9: Report on Engagement on the Noise Envelope - Errata**

Our previous submission dated 24 August 2023 [\[AS-001\]](#) identified and corrected some minor errors and omissions within the Application Documents. Further review has identified an error within the Table of Contents of ES Appendix 14.9.9: Report on Engagement on the Noise Envelope [\[APP-179\]](#) in which the appendices and page numbers have been incorrectly referenced. As part of this submission, we have updated the Table of Contents within the document and have enclosed an updated version of **ES Appendix 14.9.9: Report on Engagement on the Noise Envelope** (Doc Ref. 5.3 v2).

**Submission of Updated and Additional Documents**

The table below sets out the updated application documents and additional documents submitted as part of this response for ease of reference, including the reason for submission.

Updated or Additional Document	Document Title and Reference	Reason for Submission
Updated	Navigation Document (tracked change version Doc Ref. 1.3 v3 and clean version Doc Ref. 1.3 v3)	To include the updated and additional documents submitted as part of this response.
Updated	ES Appendix 14.9.9: Report on Engagement on the Noise Envelope (tracked change version Doc Ref. 5.3 v2 and clean version Doc Ref 5.3 v2).	To correct errata within the Table of Contents.

Additional	Ordnance Survey Base Map Identifying Category 3 Boundary and Noise Insulation Scheme Boundary (Doc Ref. 8.2)	New plan showing the proposed Inner Zone and Outer Zone Noise Insulation Scheme boundaries on the same plan as the Category 3 boundary as requested by the Examining Authority.
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The Applicant considers that the above addresses the requests for information issued by the Examining Authority in the letter dated 8 September 2023. However, if the Applicant can be of any further assistance or the Examining Authority considers any further clarification is required in response to the information and documentation submitted as part of this response, please do not hesitate to contact the Applicant using the details already provided.

Should you require any hard copies of the submitted documents identified above please let the Applicant know.

Yours sincerely,



**Jonathan Deegan**  
**Planning & Environment Lead**  
**Gatwick Airport Limited**

Enclosed as part of this letter:

- Annex A1: GAL Letter and Issues Tracker 18 August 2023
- Annex A2: Letter from the JLAs 4 September 2023
- Annex A3: GAL Response to the JLAs 5 September 2023
- Annex B: Proposed approach to developing the JLA thematic Statement of Common Ground
- Annex C: Proposed Statement of Common Ground Parties

Enclosed separately:

- Navigation Document (tracked changed version Doc Ref. 1.3 v3 and clean version Doc Ref. 1.3 v3)
- ES Appendix 14.9.9: Report on Engagement on the Noise Envelope (tracked changed version Doc Ref 5.3 v2 and clean version Doc Ref. 5.3 v2)
- Ordnance Survey Base Map Identifying Category 3 Boundary and Noise Insulation Scheme Boundary (Doc Ref. 8.2)



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**Annex A1: GAL Letter and Issues Tracker 18 August 2023**

18<sup>TH</sup> AUGUST 2023

Mr C. Smith  
Crawley Borough Council  
Town Hall  
The Boulevard  
Crawley  
West Sussex  
RH10 1UZ

Sent by email to [REDACTED]@[crawley.gov.uk](mailto:[REDACTED]@crawley.gov.uk)

Dear Clem,

**Gatwick Airport Northern Runway DCO  
NRP Local Authority Issues Tracker**

I am writing in reply to your letter of 10 August 2023 confirming your support for the preparation of an "Issues Tracker" in response to the Section 51 advice issued by the Planning Inspectorate (PINS) on acceptance for examination of the NRP DCO application on 3 August 2023 ([here](#)).

You requested that such a tracker should include (i) the key issues raised by relevant local authorities from the pre-application stage, and particularly those identified in consultation responses and raised through the Topic Working Groups (TWGs), (ii) GAL's position in response, and (iii) signposting to where GAL considers the DCO application addresses such matters.

In response to this advice and your request, we have prepared and attach the following:

- **Tracker 1** - A list of the key issues identified following the consultations in August 2022 and which informed the subsequent corresponding TWGs. This list and the GAL responses provided were previously shared with you in August 2022. We have not updated the GAL responses – they remain as provided to the authorities in those TWGs at that point in time and so have been superseded in places, but are included here for completeness. We have added a new column to provide signposting to where the topic issue is considered and/or addressed in the Application documents;
- **Tracker 2** - A response to the Surrey CC issues tracker specific to transport matters from December 2022 (again with signposting added);
- **Tracker 3** - A list of the issues/outstanding information identified in Appendix 1 to your letter to Gatwick dated 13 March 2023. Again this list includes GAL's responses and signposting to



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- the relevant Application documentation. The list further includes (in separate tabs) the issues identified in the initial SoCG discussions on (i) Forecasts and (ii) Capacity and Operations; and
- **Tracker 4** - A list of the additional information and documentation requested in Appendix E to the relevant authorities' Joint Adequacy of Consultation representation, which was not already included in Tracker 3. GAL responses and appropriate signposting are provided here too.

All of the signposting in each of the trackers refers to the document reference numbers provided in the PINS examination library for the Project's application – available [here](#) . This will be kept updated by PINS as the application process continues and further documentation is submitted.

Whilst there is some inevitable duplication across the issues trackers, we considered this preferable as it ensures a comprehensive overview of all of the key issues which have been raised in the different fora and the signposting to how such matters are now addressed in the Application. We believe that the aggregate of the information recorded in the above trackers captures the key issues that you have identified in pre-application; however, we are very happy to discuss and supplement this with in any additions which you consider to be necessary.

Once you have had an opportunity to review and consider the information, we would welcome an opportunity to discuss with you how we use these trackers to inform our engagement with you on developing thematic Statements of Common Ground. As previously noted, the SoCG can also be used to record matters not agreed and/or which remain under discussion, and we are happy to continue to work with you on the templates already issued to you to ensure they reflect appropriately the key issues contained in these trackers and to address any other queries you may have on them.

Finally, and for your awareness, we are proposing to respond to PINS' section 51 advice next week with the additional documentation requested in items 3 to 10 of that letter. As part of that, we will inform them of our intention to start our relevant representations period in early September and run this until near the end of October (exact dates are yet to be confirmed).

In doing this we are purposely further delaying the start of the relevant representations period until after August in acknowledgment (as stated in your letter from last week) that a number of key officers from the Authorities are on leave this month. This also extends the period in which representations can be made to approximately 8 weeks (and approximately 12 weeks after publication of the full DCO) to give you additional time to review the information in these Issues Trackers, the Application documentation itself and to prepare your relevant representations. We would be very happy to meet to provide further clarification on this approach and the upcoming programme if that would assist you.



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It would be helpful if you could respond with your thoughts on the completeness of the Trackers and how to make the next steps towards developing SoCG within the 15 days agreed in the PPA, part 2 of which is now with the individual GOG authorities for signature.

Yours sincerely,



PP

**Tim Norwood**  
Chief Planning Officer  
London Gatwick



Ref	Subject	Description	GAL Response provided in August 2022	Signposting to DCO application
1	Air Noise	GAL should ensure that any and all documents relevant to the consideration of the ES are supplied promptly, properly curated and in a format that facilitates processing of the information by the receiving parties. Early and meaningful engagement should be commenced with the joint authorities in relation to the ES and that timescale for processing and responding to the consultation are agreed with the joint authorities.	GAL will ensure that all documents relevant to the consideration of the ES are supplied to the local authorities promptly, and in suitable formats. GAL intends to engage with the Noise Topic Group as the noise and vibration assessment progresses to discuss the key areas of concern arising from the PEIR so as to progress to the ES with agreement of the joint authorities wherever possible.	GAL has shared noise data with LPA officers via the noise viewer on 7th March 2023.
2	Air Noise	To prevent and minimise ground noise and air noise impacts on communities to the North, any Northern Runway usage is limited to operations between 07:00 to 23:00 and is only used during the day for Chapter 3 aircraft or quieter.	The proposal is to use the Northern Runway between 06:00 and 23:00 hours to meet the requirements of the project. All aircraft at Gatwick are Chapter 3 or quieter.	Paras 14.2.45 & 14.8.8 of ES Chapter 14: Noise and Vibration (APP-039)  Requirement 19(3) of Schedule 2 to the draft DCO (APP - 006).
3	Air Noise	CBC welcome the use of the more sensitive N60 and N65 criteria and this has exposed an issue that would previously have been obscured with the conventional noise contours. To improve understanding of the use of the air space we recommend that the changes to fleet mix and assumptions about departure (and arrival routes) are included to facilitate understanding of the impact of this change as highlighted in the Leq, T and N above metrics.	Noted, the N65 contours are effective at showing the noise footprint of the additional daytime air traffic expected to use the WIZAD Route 9 in the Northern Runway cases which is the same proportion as in the future base cases. PEIR Appendix 4.3.1 provides air traffic forecasts and fleet mix. The proportion of air traffic assigned to each route will be reported in the ES. The proportions vary slightly from year to year as traffic varies. There are no plans to use WIZ at night.	N/A
4	Air Noise	GAL is requested to review the scheme of mitigation and compensation and provide updated proposals having regard to the thresholds of qualifying for grants by applying good acoustic design and the policy of wherever possible improving an area as a result of NRP. This would still allow the airport to increase profitability and in part offset the social cost of the development. As part of this the noise exposure contours are to be produced with the airport operating in single mode to examine worst case daily exposure on a peak summer day and night (for Leq,T and N, above).	GAL has considered the thresholds for noise mitigation carefully and proposed to offer noise insulation at levels below the DfT guidance, i.e. making the scheme more generous than others. The two zone scheme also provides a higher level of mitigation to these worst affected which GAL feels is appropriate. We welcome views on the details of this scheme and will work with stakeholders to develop those details including through discussions at the Noise Envelope Group. We have provided 100% easterly and 100% westerly operations noise predictions for ground noise and operations noise predictions for air noise at the Community Representative Locations (See Appendix 14.2 Section 2, and discussion in para 14.9.67 to 14.9.84) however, these are provided for additional information and not used in the assessment of effects because the accepted criteria for judging those effects are the long-term average not the noise levels on a selection of the days when operations are only easterly or westerly.	Section 14.8 of ES Chapter 14: Noise and Vibration (APP-039)
5	Air Noise	The ES should be updated to take account of likely or actual changes to airspace or options that are proposed by FASI.	At the current time FASI-5 has not developed likely airspace change options that can be assessed. We will keep this under review, and if likely new routings become available in time ahead of the DCO submission, these will be considered and assessed if sufficient information permits.	Para 14.5.7 of ES Chapter 14: Noise and Vibration (APP-039)
6	Air Noise	Sensitivity testing of different growth rate scenarios would help provide a better understanding of how noise may affect local communities in future. It is expected that this sensitivity testing would be provided in the ES.	The range of noise impacts as air traffic builds on the Northern Runway is demonstrated by the different assessment years modelled. If growth is slower impacts will be lower. GAL do not propose to assess lower traffic levels for the scheme.	Section 14.4 of ES Chapter 14: Noise and Vibration (APP-039)
7	Air Noise	Sufficient information in the ES should be provided on air noise modelling to understand the processes behind it. Information on air noise modelling should be provided, including noise measurements used to validate the noise model, the validation process, weather data, fleet forecasts and departure route splits.	A description of the CAA's ANCON model will be added to appendix 14.9.2 along with suitable references for the interested reader. A technical description of ANCON is provided in R&D Report 9842. ATM forecasts are provided in the PEIR appendix 4.3.1. Weather data is widely available from public sources. The proportional usage of routes will be included in the ES. ERCD are preparing a technical appendix on the ANCON model and its verification at Gatwick Airport that will be presented in a later TWG meeting.	ES Appendix 14.9.2: Air Noise Modelling (APP-172)
8	Air Noise	In terms of the noise insulation scheme it is suggested that the outer zone offer may be more flexible so properties that either already have ventilation or are unable to have ventilation fitted can benefit it an alternate way.	It is expected that very few dwellings already have acoustic ventilation or unable to have it fitted. Details of the final Noise Insulation Scheme will be discussed with the Noise Topic Working Group.	ES Appendix 14.9.10: Noise Insulation Scheme (APP 180)
9	Air Noise	Air noise - it would be helpful if the slower transition fleet case was considered separately to the central case assessment as a sensitivity test.	Reporting of the air noise assessment has been structured to allow the reader to understand the range of noise impacts that could arise between the more likely Central Case fleet and the Slower Transition fleet which could yet still occur, as discussed in Section 3 of Appendix 14.9.5. The Slow Transition Fleet forms the basis of the noise envelope that is proposed and guarantees that the airport will be quieter in future years than it was in 2019.	Section 3 of ES Appendix 14.9.5: 2032 Air Noise with Project Slower Transition Case v 2032 Baseline Difference (APP-175).
10	Air Noise	2029 Air noise assessment - given that there are 37 more movements in the central case scenario, it should be clarified in the ES as to how there is a reduction in population exposed to noise levels exceeding the daytime LOAEL in the 2029 scenario.	Noted in 2029 the increase in ATMs is small, only 37 a day, as a result of the Project (whereas in the 2032 assessment year the increase is 158). In 2029 the contour area increase is small, from 120.1 km <sup>2</sup> in the 2029 base to 126.0 km <sup>2</sup> in 2029 with the Project. Normally a larger contour gives a larger population, but in this case the contour also shifts slightly northwards as air traffic moves from the main runway to the Northern Runway which reduces the contour area to the south that encompasses the highly populated area of Forge Wood, creating a slight net reduction in population. This is not so in 2032 or 2038. This will be noted in the ES.	Para 14.9.71 downwards of ES Chapter 14: Noise and Vibration (APP-039)
11	Air Noise	A population of 4,800 to 6,500 people are predicted to experience an increase in noise of 1-2 dB, and it is recommended that primary and supplementary noise metrics are presented in the ES to allow easy correlation for affected communities.	Paragraph 14.9.50 to 14.9.56 summaries the results of modelling using the supplementary noise metrics, and figures 14.9.13 to 14.9.21 illustrate the noise contours including changes to N65 and N65. Recognizing that individuals may wish to understand how all the primary and secondary noise metrics will be changed by the Project in their locations, the results for all metrics are presented for the 7 Community Representative Locations, as discussed in paragraphs 14.9.76 to 14.9.84 and provided in full in Tables 14.2.1 to 14.2.14 in Appendix 14.9.2. These 7 Community Representative Locations were chosen to be in the center of the most populated areas so that the majority of individuals within the noise contours could refer to one of them to provide approximate results at this level of detail in their area.	Paragraph 14.9.197 lists the supplementary noise metrics included within the noise envelope with further details provided in ES Appendix 14.9.7: The Noise Envelope (APP-175).

12	Air Noise	Definition of an air noise study area in the ES would help identify additional community locations to be included for additional study in the ES. These receptors should be identified in the baseline section.	Paragraph 14.4.15 notes how the study area for air noise includes all receptors that may experience potential adverse impacts. For example, for some air noise metrics, this area extends more than 20 km from the airport. The 7 Community Representative Locations were chosen to cover this area for the PEIR. If consultation concludes that in order to understand the significant effects of the project further Community Representative Locations are required, that will be considered for the ES.	Para 14.4.15 of ES Chapter 14: Noise and Vibration (APP-039)
13	Air Noise	GAL are proposing the use of a daytime LOAEL of 51 dB LAeq 16 hr and night-time LOAEL of 45 LAeq 8 hr based on the DfT's Survey of Noise Attitudes (SoNA) study. However, both of these levels are significantly above levels recommended by the WHO for aviation noise in general, and at night.	The PEIR explains the choice of the Lowest Observable Adverse Effects Level across several paragraphs from 14.4.57, where it is explained that the LOAELs used accord with those provided in the Consultation Response on UK Airspace Policy: A Framework for Balanced Decisions on the Design and Use of Airspace (Department for Transport, 2017b). Earlier in the PEIR, there is an explanation for why the adoption of WHO Guidelines was not considered appropriate. 14.2.39 explains that the WHO 2018 Environmental Noise Guidelines are based on a detailed review of the literature from 1999 to 2015. In the case of aircraft noise, the scatter in the dose/response relationships is considerable, but a single dose response is offered for each health effect with associated target levels for aircraft noise in terms of the European annual average noise metrics Lden and Lnight. However, in Section 5, Implementation of the Guidelines, the WHO note: 'Furthermore, cultural differences in what is considered annoying are significant, even within Europe. Therefore, it is not possible to determine the "exact value" of % HA [highly annoyed] for each exposure level in any generalized situation. Instead, data and exposure-response curves derived in a local context should be applied whenever possible to assess the specific relationship between noise and annoyance in a given particular situation.' Paragraph 14.2.40 goes on to explain the importance of the Survey of Noise Attitudes (SoNA) study undertaken for the UK Government. SONA assessed annoyance in the UK and reported in 2017, after the cut-off date for studies considered in the WHO report. The SoNA study gives the local annoyance response relationship relevant to the UK. It shows, in the UK, about 7% of the population in 2014 was annoyed by aircraft noise at Leq, 16 hour 51 dB, and the Department for Transport has hence adopted this as the LOAEL. It should also be noted that the following UK airport development Environmental Statements have used the same day and night period LOAELs and SOAELs as the PEIR: Bristol Airport (2018), London City Airport (2015), Manston Airport (2018), Southampton Airport (2019), Leeds Bradford Airport (2020), Luton Airport 2021).	Paragraph 14.4.48 of ES Chapter 14: Noise and Vibration (APP-039)
14	Air Noise	For those within the inner zone of the proposed scheme it is important to realise that the measures being proposed are primarily to mitigate the noise impacts in the summer months, and in many cases geared around glazing solutions. As a consequence, the insulation scheme should also include works to prevent solar gain at the property and look at measures to actively cool the properties affected in view of the fact that UK summers are forecast to get hotter both by day and night.	The inner zone scheme includes blinds to address solar gain for this reason and acoustic ventilators to all noise sensitive rooms. The NIS for the inner zone is intended to provide a high level of insulation to those worst affected by aircraft noise. Details will be developed ahead of the DCO. We propose to work with the Noise Envelope Group to develop the final NIS policy.	Para 4.1.9 of ES Appendix 14.9.10: Noise Insulation Scheme (APP-180)
15	Air Noise	Justification should be provided in the ES as to how provision of insulation would help avoid significant air noise effects.	Provision of noise insulation to allow significant effects to be avoided has longstanding precedent in case law. The PEIR explains this in paragraph 14.8.30 with an example reference to the Cranford Appeal in Footnote 7.	Para 14.2.56 of ES Chapter 14: Noise and Vibration (APP-039).
16	Air Noise	Noise envelope - if the 'central case' is considered to represent an achievable rate of fleet transition, it is recommended that noise contour area limits are based on 'central case' noise predictions: Details on how the benefits of new aircraft technologies are shared between the applicant and local communities should be provided; Expected that a mechanism is adopted to allow for further reductions in the contour area limits to provide further community benefits with technology improvements in the future; Information should be provided in the noise envelope on what actions would be taken in the event of an exceedance of the noise envelope limits; Details on the enforcement regime should be provided; More detail on how potential compliance with contour limits will be achieved would be beneficial and help provide reassurance that exceedances of noise contour limits can be avoided; Existing restrictions on night flights, would expect to see these explicitly defined in the noise envelope; Recommended that consultation is undertaken with local communities and relevant stakeholders to discuss the contents of the noise envelope; discussions should allow the opportunity local communities and relevant stakeholders to submit recommendations for noise envelope contents to GAL.	These suggestions will be further discussed by the Noise Envelope Group.	This has been discussed as part of the Noise Envelope Group. Engagement on the Noise Envelope is set out in ES Appendix 14.9.9 Report on Engagement on the Noise Envelope (APP-179).
17	Air Noise	Noise Envelope (CAP 1129) - At present the airport's current proposals appear to fall short on all of the above tests. In the design of the proposals there has been no consultation with the local community or relevant stakeholders in defining the design of the envelope, which is in stark contrast to the work that has gone on at Heathrow.	The Northern Runway PEIR consultation is the beginning of the process to consult with all stakeholders on the noise envelope proposal. We plan to discuss our proposals further with interested stakeholders and develop the noise envelope for inclusion in the DCO application. Local Authority Environmental Health Practitioners will be invited to join the Noise Envelope Group to help GAL develop the Noise Envelope in the coming months.	ES Appendix 14.9.9 Report on Engagement on the Noise Envelope (APP-179)
18	Air Noise	It is suggested that in the final ES the 2029 noise modelling scenario is run using 284,987 ATMs (i.e. 2019 air traffic movements) to demonstrate the extent to which the airport is sharing the benefits of quieter aircraft with the local community, and to assess the health impacts of the growth in its totality. This data would then help inform the setting of the noise envelope on the basis of the airport is allocated 50 % of the noise improvement for its growth.	Sharing the benefits will be considered in the Noise Envelope Group.	ES Appendix 14.9.7: The Noise Envelope (APP-175).

19	Air Noise	It is considered that the proposed 51db Leq 16 hour day and 45db 8 hour Leq night contours are insufficiently precise due to modelling limitations. The choice of these contours appears to be based on their stated LOAEL. However, this is a matter of compliance not health. A stronger and more accurately measured and modelled metric would be a 54db day time contour as this would give a more precise control. Night time controls require more consideration and are outside the scope of this response.	We note your concern about the accuracy of Leq 16 hr contours, however, we are assured by the CAA that levels of 51dB are reliably modelled by their ANCON model for Gatwick. Joseph Lee (JL) of ERCD gave an overview of the ANCON model at TWG2 then explained how the model was validated at Gatwick using NTK data in particular to ensure that the modelled aircraft height, speed and noise level profiles matched those measured at Gatwick along arrivals and departure routes. He explained how SEL and Lmax levels are generated within the model and adjusted to fit the levels measured in the ground. We feel it is important to relate the envelope to the DFT guidance on the Lowest Observable Adverse Effects Levels.	N/A
20	Air Noise	Raise concern regarding the lack of consideration of impacts on communities to the east of the airport, particularly Burstow, Smallfield, Lingfield and Dormansland. This is further felt at night due to the highest levels of night flights of any UK airport, except East Midlands. The effects of prevailing winds and travelling noise seems to have been focused to the west of the airport with little consideration of the experiences of current residents to the east who have first-hand knowledge of how the existing airport operations impact them. It is requested that the methodology and technical details regarding this be revisited.	The assessment of noise impacts considers all areas of potential noise impact equally, eg mapping noise across this area and discussing noise changes in Section 14.9. Lingfield is chosen as one of the Community Representative Locations for detailed analysis. However, because the northern runway will be used for departures only, and on approximately 75% of the year this area of concern is overflowed by arrivals which will not be moved by the northern runway, the noise changes are smaller in this area.	Section 14.9 of ES Chapter 14: Noise and Vibration (APP-039).
21	Air Noise	Communities that live under the flight paths of the Airport are already affected by air noise. Increases in the number of flights will mean more disturbance events. Even if each noise incidence is quieter when accounting for newer technology in the future, the impact of multiple aircraft can have adverse effects. The proposals suggest that communities in the north of Sussex, that have little or no noise exposure at present, will be exposed to regular and frequent aircraft noise in the future, which is of concern.	The Northern Runway Project does not require any change to flight paths over north Sussex, so we do not expect communities with no noise at present to be exposed to aircraft noise in this area.	N/A
22	Air Noise	The following points (data gaps and/or inconsistencies) provide an overview of the main issues: Baseline noise data from 2016 survey is not presented; Information on aircraft fleets, movement numbers and track usage for the assessment scenarios are not provided; No noise data from the Gatwick Airport Noise and Track Keeping system is presented in the PEIR; There is a lack of detail on the noise modelling methodology and validation using data from the Noise and Track Keeping system; No details on weather conditions applied in noise modelling are provided; Overflights are presented in a 3.6x3.6km grid, so not considered to be of sufficient resolution for any meaningful analysis.	The 2016 baseline survey results are summarized in Table 14.6.4 and described in detail in section 2 of Appendix 14.9.3 The 2016 Baseline noise report will be provided. Aircraft movements numbers are provided. The noise assessment carried out for the PEIR assumes the distribution of flights across routes remains largely unchanged except a slight increase in use of the WIZAD route, in the base case and with the Northern Runway Project in future years. Paragraph 14.4.19 describes how NTK data is used by the CAA to calibrate the noise model, though it was not thought to be useful to include that data. Further details are available in ERCD Report 2002 Noise Exposure Contours for Gatwick Airport 2019. It is not clear why weather data is of interest, given the presumption that the weather in the future will be as it is today for the purposes of noise modelling. Table 14.12.1 provides details of overflights changes expected at two Landscape Assessment locations in East Sussex, Firlie Beacon and Ditchling Beacon, at which the increase in overflights as a result of the project are estimates as 1-2 more flight per day. Further work will be done on overflight for presentation in the ES including considering refining the grid size if necessary.	Section 14.4 of ES Chapter 14: Noise and Vibration (APP-039) sets out the Assessment Methodology. Appendix 14.9.6 Ground Noise Baseline Report (APP-176)
23	Ground Noise	GAL need to undertake a noise assessment on fixed plant items to inform the localised impacts of the development and need to do so at an early stage within the Environmental Statement to assist in finalising the proposed layout.	This has been discussed within the Noise Envelope Group, and we confirm it is the intention that noise assessments on fixed plant will be undertaken. The assessment requires a sufficient level of detail in terms of the likely locations of, and design of plant items which should become available in the coming weeks. We anticipate that noise control measures can be incorporated into the design if necessary to avoid significant noise impacts.	Noise emissions from fixed operational facilities is assessed using the BS 4142 method, in Section 14.9 of ES Chapter 14: Noise and Vibration (APP-039).
24	Ground Noise	Information on the following should be provided in the ES: Sound power levels applied to APUs; Sound power levels applied to engine ground running; Details on how Lmax noise levels have been calculated.	The sound power level used for calculating the maximum noise level produced by APUs is the same as has been presented in previous ground noise models at the airport as follows: A sound power of 116.7 dB Lw (representative of a Boeing 747 size aircraft) has been used to calculate the maximum noise level from all stands due to APU usage. This is a conservative worst-case model as in reality some of the stands cannot accommodate aircraft of this size and the smaller APU associated with smaller aircraft would have a lower sound power level.	Section 14.4 of ES Chapter 14: Noise and Vibration (APP-039)
24	Ground Noise		The sound power levels used for assessing engine ground noise running have been taken from results of the airside measurement survey in 2019 that is detailed in Appendix 14.9.3 and represent the highest measured noise levels from engine ground running (engine operating at full power – see example charts to the right). It is acknowledged that section 6 of Appendix 14.9.3 does not include the requested information and this will be updated for the ES. The Lmax has been calculated, in all cases, by making the assumption that the highest predicted LAeq 1second is roughly equivalent to the Lmax S (S denotes the slow time weighting which is 1 second). It should be noted that the example charts of engine ground running noise show the measured LAeq 1second and that the highest individual 1 second measurement has been used to calculate the sound power level for engine ground running.	Section 14.4 of ES Chapter 14: Noise and Vibration (APP-039)
25	Ground Noise	MVDC recommends that GAL carries out a comprehensive exercise of night time monitoring to provide representative background night time noise measurements against which any new plant can be assessed in accordance with the BS4142 noise rating assessment. Ideally, the representative background noise should be captured as a night time ground based contour mapping exercise and provided in the PEIR to help identify suitable noise targets for the design of future plant.	These points were discussed and responses provided in the Noise Topic Group meeting on 2nd November 2021. It will not be possible to produce baseline noise contours around the airport perimeter given the complexity of the neighbouring noise environment comprising a variety of non-airport noise sources as well as airport ground and air noise. Instead noise criteria will be derived from the measured baseline levels at the representative locations around the site perimeter using the BS4142 method for assessing external noise at residential properties. These criteria will be used as design standards for all fixed plant on the airfield so as to ensure significant noise impacts are avoided. Ground noise levels in 2022 are likely to be unrepresentative due to the effects of the COVID-19 pandemic. The 2016 Ground Noise Baseline Report provides a comprehensive survey of baseline noise levels at 16 noise sensitive receptors around the periphery of the airport. It is anticipated that where other receptors need to be considered for the assessment of fixed noise sources suitable baseline noise levels can be derived from this report interpolating between locations if necessary.	ES Appendix 14.9.6 Ground Noise Baseline Report (APP-176) Section 14.4 of ES Chapter 14: Noise and Vibration (APP-039)

26	Ground Noise	The effects of ground noise (from engine ground running or aircraft auxiliary power units) on local communities, particularly in Horley, Charlwood, and Crawley, are unclear and further work is required.	Section 14.9 (see p14.86) of the PEIR describes the expected impacts of ground noise including ground running and APU noise with details provided in Section 6 of Appendix 14.9.3.	Noise from aircraft auxiliary power units (APUs) has been scoped into the assessment and is considered within Section 14.9 of ES Chapter 14: Noise and Vibration (APP-039).
27	Ground Noise	A full description of methods / techniques is not presented in the PIER (e.g. noise survey forms), particularly with reference to the 2016 noise survey at the twelve sites shown in Figure 14.4.1.	The 2016 Baseline Survey report has now been issued to the Noise Topic Group as part of ongoing discussions with Local Authorities on details of the noise assessment and proposed mitigation.	ES Appendix 14.9.6 Ground Noise Baseline Report (APP-176)
28	Ground Noise	The assumption that no change occurred between 2016 and 2018 in baseline data needs to be validated if it is to be relied upon. No justification has been provided for the assumption that baseline noise levels have not changed since 2016. This should be confirmed.	Noted, however, ground noise is modelled for all assessment years and the levels and changes in noise are used in the assessment. Air traffic at Gatwick changed very little between 2016 and 2019: Average summer 16 hour day ATMs reduced by 0.6% from 771 to 766 and average summer night traffic was unchanged at 127 ATMs. Similarly, road traffic levels of local roads in general changed little in this period. Therefore, it is reasonable to assume that ambient noise levels in 2018 and 2019 were very similar to those measured in the 2016 baseline survey.	ES Appendix 14.9.6 Ground Noise Baseline Report (APP-176) Para 14.4.21 of ES Chapter 14: Noise and Vibration (APP-039)
29	Ground Noise	The Gatwick 'hum' in any particular location varies according to wind direction. It would therefore be appropriate to measure the background (L90) noise levels in upwind conditions to ensure a true background noise level. The ground noise propagation should then be calculated using a positive downwind scenario. Details on weather condition assumptions should be provided in the ES.	Wind direction has been considered carefully in the PEIR as explained in Appendix 14.9.3. Easterly and westerly operations are modelled separately. Initially downwind propagation was considered in all modelling cases, but this provided baseline levels above the measured baseline that were too conservative. This is because some receptors cannot always be downwind of some noise sources because the runway mode changes direction. To model wind effects more accurately, a realistic average wind speed and direction was used for westerly operations, and a different realistic average wind speed and direction was used for easterly operations. Different wind speeds and directions were also modelled for day and night. The wind direction corrections in the ground noise model for aircraft taxi movements have been calculated based on meteorological data taken from an airside mast at Gatwick in 2018. Average wind speed and direction has been calculated for four separate conditions: Day and Night under Easterly and Westerly operations. A summary of the 2018 meteorological data analysis is presented within Section 4.2 of Appendix 14.9.3 which also describes the methodology for calculating wind speed and direction effects within the noise model used in the PEIR for modelling noise from aircraft on the ground.	ES Appendix 14.9.3 Ground Noise Modelling (APP-173)
30	Ground Noise	The 'end-around' taxiways and the new Juliet holding spur need to be examined in detail as these both bring taxiing aircraft closer to existing residents. The use of bunds has been mentioned but full calculations and assumptions would need to be published to demonstrate their effectiveness. Details on ground noise model inputs, including source and bund locations, should be provided in the ES.	Noise from end around taxiways has been predicted and assessed in Section 14.9 of Chapter 14. A new bund has been designed and ground noise levels have been modelled with it in place, as reported in Section 14.8 and 14.9 and in Appendix 14.9.3. Details of basic noise modelling inputs are included within Appendix 14.9.3 and bund/barrier locations are described in Section 14.8. More detail will be provided in the ES once the design has progressed and locations and dimensions have been confirmed. The assessment of end around taxiways presented in the PEIR reflects the usage which is expected to be very low based on the forecast fleet mix on which the predictions are based. In order to ensure that the impact of end around taxiway use was not simply averaged and ignored, it has been considered as part of the assessment of maximum noise levels. The text relating to end around taxiways will be reviewed to ensure that it has been adequately explained so that a clear presentation of the assessment methodology is provided in the ES.	Section 14.9 of ES Chapter 14: Noise and Vibration (APP-039). ES Appendix 14.9.3 Ground Noise Modelling (APP-173)
31	Ground Noise	The increase of aircraft using Gatwick will result in an increase in maintenance and ground runs. The location for future ground runs needs to be agreed and the impact calculated when compared to the present location and frequency. Details on source locations for the baseline and 'with development' models should be provided.	Noise levels from ground runs with the Project have been predicted and assessed, see Section 14.9 and Appendix 14.9.3. A map of the engine ground running locations is shown on the next slide. It should be noted that there is no difference between the locations for the baseline and with development cases. The four locations and the relative assumed usages are as follows: Alpha 2 = 5%; Juliet Tango/Sierra = 50%; Juliet 4 = 10%; Yankee = 35%;	Section 14.9 of ES Chapter 14: Noise and Vibration (APP-039). ES Appendix 14.9.3 Ground Noise Modelling (APP-173)
32	Ground Noise	Ground noise receptors are defined at Paragraph 14.6.18 of the PEIR. Whilst it is noted that the receptors cover the majority of properties around the airport boundary, a review of receptors identified the following that may need inclusion: Westfield Place Farm, Lowfield Heath Road; Mayfield Farm Bungalow and Maple Manor Hotel, Charlwood Road; Rowley Farm Cottage and Little Rowley, London Road.	Westfield Place farm will be included in the assessment reported in the ES. Ground noise levels here will be mitigated by the noise bund described in the PEIR with more details being provided in the ES. Mayfield Farm Bungalow and Maple Manor Hotel, Charlwood Road are in the vicinity of Myrtle Cottage (ref 10) and would have similar impacts so do not need specific reporting. Rowley Farm Cottage and Little Rowley are both within 75 m of London Road which is a dual carriageway that generates significant levels of road traffic noise. By comparison, the representative assessment location used in the PEIR (no. 11 Rowley Farmhouse) is at the top of the hill and receives relatively little road traffic noise from London Road making it more sensitive to any ground noise impacts. Additionally, in consultation with the Noise Topic Group in November 2021, it has been identified that the Tinsley Green area could be better represented in the ground noise assessment presented in the PEIR, and we will therefore be including an additional assessment location for Tinsley Green (site 15 - Hoots Cottage) in the ES.	Section 14.9 of ES Chapter 14 Noise and Vibration (APP-039)
33	Ground Noise	Paragraph 14.4.76 of the PEIR states that there is less likely to be a significant effect if less than 10 events above the specified criteria. Whilst it is acknowledged that this is a commonly accepted approach for L <sub>max</sub> noise, it does not allow a complete understanding of how noise will affect local communities as L <sub>max</sub> noise levels could potentially be any level above the criteria. It may be helpful to define an upper limit for L <sub>max</sub> noise that no events should exceed. Alternatively, more information would be required on the number of events exceeding the criteria and the level of the exceedance in the assessment.	Noted, this is a commonly accepted approach. L <sub>max</sub> levels are reported as absolute noise levels, not just numbers of events above criteria, in Table 14.9.6.	Table 14.9.6 of ES Chapter 14 Noise and Vibration (APP-039)
34	Road Traffic Noise	The Study Area for road traffic noise should be defined in the ES to ensure that all potentially affected receptors that may experience an increase in road traffic noise are identified.	We are confident the necessary area has been assessed in the PEIR by following DMRB guidance, but the study area for road traffic noise will be better defined in the ES.	Para 14.4.16 of ES Chapter 14: Noise and Vibration (APP-039)
35	Road Traffic Noise	Road traffic mitigation - would be helpful to illustrate the location of the proposed mitigation in the ES.	Noted, at the PEIR stage the design was still evolving, but mitigation will be mapped in the ES.	Ground noise mitigation is set out from para 14.8.26 of ES Chapter 14: Noise and Vibration (APP-

36	Road Traffic Noise	No justification is provided on the assumption that night-time road traffic noise effects will not be significant; Clarification should be provided in the ES if long-term changes in noise are calculated to be less than 5 dB; Details should be provided in the ES on the absolute level of road traffic noise at receptors experiencing short-term changes in noise of 1dB or more; An assessment of road traffic noise effects in interim years should be provided in the ES;	It is considered to be unlikely at this stage that night-time noise will give rise to significant effects because noise changes during the day are usually larger than during the night, however, night time noise modelling will be undertaken and this will be confirmed in the ES. Table 14.4.9 shows long term noise levels will mostly reduce with mitigation and will increase by less than 5dB. This will be updated in the ES for the final road scheme. Table 14.4.8 provides absolute levels of road traffic noise and shows no short term increases of more than 1dB with mitigation. This will be updated in the ES for the final road scheme. A commentary on likely noise levels in interim years will be provided.	Night-time noise has been assessed within the ES for the final road scheme at para 14.9.77 onwards of ES Chapter 14: Noise and Vibration (APP-039).
37	Road Traffic Noise	Paragraph 2.1.4 states that all roads were modelled with a width of 7m; however, assuming all roads are 7 m wide may lead to some errors close to the road. Table 4.5.4 shows unmitigated and mitigated with scheme levels but does not label this clearly. It would be helpful to predict road traffic noise levels at the monitoring locations for direct comparison to measured noise levels. It would be helpful to define that mitigation is embedded into the project and unmitigated noise levels are provided for information only to demonstrate the effectiveness of mitigation.	The CRTN modelling method was used that located sources 3.5m from the nearside carriageway. Also there are no receptors close to the roads. In Table 4.5.4 footnote 1 is used to identify mitigation, but this will be made more clear in the ES. It is not intended to model noise levels at the monitoring sites because monitoring sites are not always directly at sensitive receivers and traffic flows during monitoring may vary as discussed. Table 14.8.3 and text below it lists the mitigation to be added to the scheme, and noise levels are predicted with and without this mitigation to illustrate its effectiveness.	Mitigation embedded into the project is set out in Section 14.8 of ES Chapter 14: Noise and Vibration (APP-039)  Tables 14.9.1 and 14.9.2 of ES Chapter 14 give the predicted reasonable worst case noise levels without further mitigation.
38	Road Traffic Noise	The predicted noise levels from Table 4.5.4: Predicted Road Traffic Noise Levels appear acceptable but insufficient evidence has been provided with regards to the impacts on first floor receptors. Currently the only elevated receptors that appear to be considered are in Table 4.5.2 of Road Traffic Noise Appendix. All elevated facades must be considered in order to establish if the proposed barrier height provides acceptable mitigation to first floor and above.	Noted, this is the intention. Further site visits have been completed and more will be undertaken to confirm affected buildings details. If LPAs are aware of any particularly noise sensitive receptors, please let us know.	Noise sensitive receptors are set out in Para 4.1.2 of ES Appendix 14.9.4 Road Traffic Noise Modelling (APP-174).
39	Construction Noise	Justification should be provided in the ES for identifying a Negligible effect if a receptor is exposed to construction noise for a duration of less than one month.	Noted, impacts of < 1 month should generally be rated as 'minor'. Major construction projects, such as HS2, adopt this approach to short term impacts. This will be clarified in the ES	Para 14.4.41 of ES Chapter 14 Noise and Vibration (APP-039).
40	Construction Noise	Details should be provided in the ES on construction activities taking place during each construction assessment period; Details on assumptions on plant for each construction activities should be provided in the ES; Details on predicted construction noise levels during each assessment period should be provided in the ES; Embedded mitigation will be secured in the CoCP; however, there is discussion regarding "additional mitigation", which is not defined in the PEIR. As the "additional mitigation" is that secured by the CoCP, it should be part of the main assessment and not identified as additional. Detail on mitigation assumptions should be provided should be provided in the ES.	Appendix 14.9.1 lists the activities expected to take place in day, evening and night periods. Plant teams will be provided in the ES. Predicted construction noise levels will be provided in the ES. Further mitigation, e.g. noise barriers will be assessed in the ES, but the Section 61 process will secure the final choice of mitigation once the contractor is on board.	Para 14.9.46 of ES Chapter 14: Noise Vibration (APP-039)  ES Appendix 5.3.2 Code of Construction Practice (APP-082)
41	Construction Noise	Clarification should be provided in the ES as to why Moderate Adverse effects were identified for construction noise; It is not identified whether preliminary predictions identify if any properties may qualify for temporary rehousing. This information should be provided in the ES; Details should be provided in the ES if receptors that are predicted to experience noise levels exceeding the LOAEL but below the SOAEL experience a significant effect;	Paragraph 14.9.2 and 14.9.3 note that the PEIR assessment is based on information that will be refined for the ES, so the rating of noise impacts will also be refined in particular with the addition of further mitigation. The assessment of effect will follow the methodology stated in the Section 14.4 of the PEIR and the rating will be explained in the ES. Noted, the ES will estimate numbers of properties likely to require noise insulation or temporary rehousing.	Para 14.9.52 onwards of ES Chapter 14: Noise and Vibration (APP-039)  ES Appendix 5.3.2 Code of Construction Practice (APP-082)
42	Construction Noise	MVDC does not accept that it is reasonable to downgrade the severity of construction noise impacts based on the size of the population affected. Evidence to support this approach is requested and clarification should be provided in the Environmental Statement as to why Moderate Adverse effects have been identified for construction noise.	Paragraph 14.4.37 notes that other factors are taken into account where predicted levels are above LOAEL but below SOAEL. Consideration of the size of the populations was included for example in the HS2 assessments. Paragraph 14.35 states the SOAEL. Levels above SOAEL are significant regardless of population. The PEIR expected that with mitigation including noise insulation where necessary impacts will be below SOAEL and reduced to Moderate. Further mitigation will be considered in the ES.	Para 14.4.39 onwards of ES Chapter 14: Noise and Vibration (APP-039)
43	Construction Noise	The CoCP in the ES will contain details of the following: Details of relevant legislation and standards that were used to inform the CoCP; Construction vibration thresholds for human disturbance; Construction vibration thresholds for cosmetic building damage; Construction noise thresholds – including thresholds for insulation and temporary rehousing; Details on the Section 61 consent process and requirement of a Section 61 application; Details of consultation with the host authorities regarding the Section 61 process	Agreed, this is the intention. A Construction Phase Noise Insulation and Temporary Rehousing Policy will be produced explain the details of the schemes.	Para 5.9.4 onwards of ES Appendix 5.3.2 Code of Construction Practice (APP-082)  Para 14.9.4 onwards of ES Chapter 14: Noise and Vibration (App-039)
44	Construction Noise	A draft code of construction practice is offered but, given the significant impacts identified, further clarification is required on the following issues: Details of consultation with the host authorities regarding the Section 61 process; Predicted noise impacts to be generated by the proposed construction activities; Individual zoning plans identifying the areas where there is likely to be an exceedance of the SOAEL and the number of sensitive properties likely to be affected; A scheme of assessment to provide systematic base line noise surveys of all high risk zones in accordance with these zoning plans; Construction noise thresholds to be mitigated or avoided, including thresholds for insulation and temporary rehousing.	It is the intention to add this detail to the ES report and CoCP. Noting that the exact methods of working will be decided later by the contractor, there will remain some uncertainty in the predicted noise levels and hence maps of zoning plans may not be appropriate, but will be considered. We will share the refined assessment results and full CoCP proposals with the Noise Topic Group for discussion as we work towards the ES and DCO submission.	Para 5.9.4 onwards of ES Appendix 5.3.2 Code of Construction Practice (APP-082)
45	Construction Noise	MVDC would expect the following management measures to be developed with any future submission: Commitment to appoint a suitably qualified acoustics practitioner to implement and manage a noise and vibration monitoring programme; Where necessary, suitable provision of continuous noise monitoring for all construction zones identified as presenting potential for highly intrusive noise impacts; Details of how construction zones will be screened to identify high risk construction activities where continuous PM10 monitoring will be needed (see the Mayor of London guidance 2014); Provision of an online reporting portal showing continuous monitoring results and any exceedances; A contractor first approach showing how complaints will be reported, logged and managed, and how records of corrective action will be kept.	Some of these points were discussed and replied to in the Noise Topic Group meeting on 2nd November 2021. The CoCP will clarify the approach to noise monitoring during construction, including continuous monitoring which may be needed in any areas of high long duration impact. The CoCP will clarify the approach to noise monitoring during construction and a commitment to publish measured levels on line in cases where widespread impacts are expected. The CoCP will clarify the procedures for handling noise complaints. Noted, para 5.10.3 of the Outline CoCP gives this commitment, and detail will be added.	Para 5.9.15 onwards of ES Appendix 5.3.2 Code of Construction Practice (APP-082)

46	Construction Noise	Comment at 8.11.51 which refers to re-housing residents while noise mitigation is undertaken, yet no reference to where this temporary accommodation will be. In an area with a restriction on available homes, further detail and plans for this should be shared.	This paragraph refers to temporary re-housing as a last resort if all other mitigation is not sufficient, so as to avoid residents being significantly affected by levels of construction noise inside their dwellings. The Code of Construction Practice in the ES will provide further details.	Para 5.9.4 onwards of ES Appendix 5.3.2 Code of Construction Practice (APP-082)
47	Construction Noise & Vibration Update	Noise Sensitive Receptors discussed by areas in PEIR	Further NSR details identified through site visits, residential receptors discussed in smaller areas. LPAs to advise of any particularly sensitive receptors ?	Noise sensitive receptors are set out in Para 4.1.2 of ES Appendix 14.9.4 Road Traffic Noise Modelling (APP-174).
48	Construction Noise & Vibration Update	Construction noise modelled for 73 main construction works in PEIR	Construction plant teams refined, refined road scheme modelling adjusted and program of concurrent works updated. On site noise barrier mitigation modelled.	Section 14.4 of ES Chapter 14: Noise and Vibration (APP-039)
49	Construction Noise & Vibration Update	Construction traffic routes assessed qualitatively in PEIR	Construction traffic modelled (see above).	Para 14.9.1 onwards of ES Chapter 14: Noise and Vibration (APP-039)
50	Construction Noise & Vibration Update	Vibration – sources identified, impacts not expected as per PEIR	Vibration levels predicted.	ES Chapter 14: Noise and Vibration (APP-039)
51	Construction Noise & Vibration Update	Code Of Construction Practice in PEIR	Outline CoCP developed into full CoCP	ES Appendix 5.3.2 Code of Construction Practice (APP-082).
52	Construction Noise & Vibration Update	Commitment to Noise insulation to address residual significant effects in PEIR	Noise Insulation and Temporary Rehousing Policy produced.	ES Appendix 14.9.10 Noise Insulation Scheme (APP 180)

Ref	Subject	Description	GAL Response provided in August 2022	Signposting to DCO application
1	Air Quality Action Plan	The key recommendation is for the applicant to prepare a robust Air Quality Mitigation Plan to mitigate and/or offset the airport and airport traffic-related emissions.	GAL will include an Air Quality Action Plan in addition to the mitigation sections in the ES.	ES Appendix 5.4.2: Carbon Action Plan (APP-091) details commitments made to mitigate carbon emissions and will reduce emissions of pollutants.  ES Appendix 5.4.1: Surface Access Commitments (APP-090) details measures to manage airport traffic-related emissions that reduce emissions of pollutants.
2	Compliance Limit Values	Request for application of the NPS policy Test for Air Quality.	An additional discussion section will be added to the ES on assessment against limit values.	Table 13.2.2 of ES Chapter 13: Air Quality (APP-038) sets out the air quality standards and limit values. Table 13.2.4 sets out how relevant air quality requirements of the ANPS have been taken into account.
3	Congestion	Consideration should be given to the use of temporal profiles or period data (e.g., peak hour (AM/PM), inter-peak (IP) and off-peak (OP)) within the future assessment for the ES chapter.	Period data will be modelled	Para 3.10.1 of ES Appendix 13.4.1 Air Quality Assessment Methodology (APP-158).
4	2038 Assessment Scenario	It is acknowledged that predictions for 2038 will be uncertain but this does not justify the absence of a 2038 assessment of road vehicle emissions, which should be provided in the ES.	GAL to include a detailed operational assessment of 2038.	The assessment methodology for road traffic emissions is set out in Section 3.10 of ES Appendix 13.4.1 Air Quality Assessment Methodology (APP-158).
5	Additional receptors for ES	Additional receptors have been provided by the local authority to be included in the ES assessment.	Additional model receptors to be added as requested.	ES Appendix 13.6.2 Air Quality Receptors (APP-160).
6	Clapp & Jenkins Approach	Request to provide a comparison of the Defra NOx to NO <sub>2</sub> calculator and the Clapp and Jenkin approach.	A comparison will be included in the ES.	Para 4.4.2 onwards of ES Appendix 13.4.1 Air Quality Assessment Methodology (APP-158).  A sensitivity test was carried out and results are provided in ES Appendix 13.9.2 Air Quality Sensitivity Tests (APP-168).
7	200m screening of roads	Comment on whether 500m screening should be used for 'major' roads.	Best practice methodology following IAQM guidance (200m screening) will be undertaken for the ES.	Para 13.5.8 of ES Chapter 13 Air Quality (APP-091).
8	Model verification details	Request statistical parameters including the fractional bias and correlation coefficient are presented.	Details will be included in the ES documentation	Table 3.3.1 of ES Appendix 13.6.1 Air Quality Data and Model Verification (APP-159).
9	2047 assessment scenario	It is acknowledged that predictions for 2047 would be uncertain but this does not justify the absence of a 2047 assessment, which should be provided in the ES.	An emissions inventory will be created for 2047.	Table 13.10.8 of ES Chapter 13 Air Quality (APP-091).
10	Monitoring	Request for monitoring (e.g. dust, NOx, PM, UFP).	Request for monitoring of multiple pollutants in the vicinity of the airport is noted. A draft monitoring proposal has been produced.	Monitoring requirements are set out in Section 3.10 of ES Chapter 13 Air Quality (APP-091).
11	Ultrafine particles (UFPs)	There should be more detailed discussion and qualitative assessment on the potential health impacts of UFPs as a result of the planned development.	Addition discussion will be provided in the ES documentation.	Para 13.2.5 of ES Chapter 13 Air Quality (APP-091).
12	Health impacts	Request for a more detailed/quantitative assessment of the health impacts for the Project.	A proportional quantitative assessment will be undertaken for the ES.	Section 3.10 of ES Chapter 13 Air Quality (APP-091) and Section 18.8 of the ES Chapter 18 Health and Wellbeing (APP-043).
13	Pier 7 APU emissions	The ES needs to examine the impact of Pier 7 APU emissions on the surrounding area allowing for a potential doubling of days above 25C during the summer, to evaluate the potential benefits of preconditioned air being installed at this pier when it is constructed.	Piers will be modelled separately for the ES.	An In-combination Climate Change Impacts assessment has been completed for the ES (ES Chapter 15: Climate Change (APP-040) and Section 3.4 of the ES Appendix 13.4.1 Air Quality Assessment Methodology (APP-158).
14	Uncertainty in emissions over time	It is unclear from the PEIR what if any assumptions have been made to account for the uncertainty in improvement of emissions over time.	Defra's projected background concentrations and Emissions Factors Toolkit (v11) emissions for the year of each assessment will be used.	Para 13.7.16 of ES Chapter 13 Air Quality (APP-091).
15	Sussex Air Guidance	The Applicant should demonstrate regard given to the Sussex Air Partnership's Air Quality and Emissions Mitigation Guidance for Sussex (2021) in assessing air quality impacts and deriving necessary mitigation measures as well as the Defra 'Air quality damage cost guidance'.	We are proceeding with the national Transport Analysis Guidance (TAG) assessment methodology which will provide for an overall assessment of costs and benefits across the Project.	The costs associated with air pollution to the economy are included in ES Chapter 17: Socio-economic Effects (APP-042) and Table 13.4.1 of ES Chapter 13 Air Quality (APP-091) considers the Sussex Guidance.
16	Habitats regulations assessment (HRA)	For the ES it will be important to understand that a true 'in combination' assessment has been undertaken (i.e. considering the effect of the Scheme in combination with traffic growth due to housing and employment delivery in the modelled area between base year and assessment year).	Updated HRA assessment to be included in the ES.	ES Appendix 9.9.1 Habitats Regulation Assessment (APP-134 & APP-135).
17	Ammonia	Ammonia emissions from road traffic should be included in the ES using the most appropriate methodology available at the time.	A proportionate assessment of ammonia will be undertaken with guidance from Natural England and ecology specialists.	Ammonia has been included in the assessment of impact at ecological receptors in Section 13.5 of ES Chapter 13: Air Quality (APP-091).
18	Additional ecology results	It would seem that nitrogen deposition has not been calculated where NOx concentrations do not exceed 30µg/m <sup>3</sup> , apart from the four sites in the HRA. It is recommended that nitrogen deposition is calculated even when NOx is below 30µg/m <sup>3</sup> , as it could still make a significant contribution to N deposition even if NOx does not exceed the Critical Level.	Nitrogen deposition will be calculated for all designated ecological sites.	ES Appendix 9.9.1 Habitats Regulation Assessment (APP-134 & APP-135) and Section 13.5 of ES Chapter 13 Air Quality (APP-091).

19	Source apportionment	Source apportionment needs to be done on model receptor points [in] particular those in Horley AQMA. Is this something Arup will do for the ES? Important to do this to separate Aviation emissions from traffic	Source apportionment (split by airport and non-airport sources) for each receptor will be undertaken and presented in the ES.	The ES has included a source apportionment of predicted pollutant emissions for the main sources, such as aircraft in the air, aircraft on ground, airport activities, car parks, airport related and non-airport related road traffic. Predicted pollutant concentrations have been presented in tabular format in ES Appendix 13.9.1: Air Quality Results Tables and Figures P1-2 and P4-6 (APP-162, APP-163, APP-165 & APP-166).
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Ref	Subject	Description	GAL Response in August 2022	Signposting to DCO application
1	Study Areas	The study areas for the PEIR (Chapter 16) and that used in the Economic Impact Report (Oxera, 2021) are different, making direct comparison across the two documents impossible.	Evidence will be presented for both the Labour Market Area (LMA) and the Five Authorities Area across the ES Chapter and the Economic Impact Report to enhance consistency across the evidence.	Explanations are given in paragraphs 17.4.10 and 17.4.11 of ES Chapter 17 Socio-Economic (APP-042) and Appendix 17.9.2 Local Economic Impact Assessment (APP-200).
2	Study Areas	Clarity should be provided as to why the Local Study Area does not align more closely with the Northern West Sussex FEMA.	The Northern West Sussex FEMA is defined in terms of a combination of labour markets, housing markets, commercial property markets and consumer catchments, using published data (e.g. 2011 Census) and other sources. For the purposes of assessing the specific impacts of the NRP, particularly in terms of labour market, the PEIR assessment considered more detailed travel-to-work data for Gatwick's passholders, which we consider comprises a more relevant baseline position compared to the ONS Census 2011 commuting data which relates to all resident workers and workplace jobs. The Local Study Area is used principally for assessing other types of effects, such as resident and business disruption. In any event, the FEMA geography is included within all study areas (except the local study area), and the ES will include a more granular analysis at the LPA level.	Paragraph 7.4.11 of ES Chapter 17 Socio-Economic (APP-042) and Appendix 17.9.2 Local Economic Impact Assessment (APP-200).
3	Study Areas	The extent of the Local Study Area will be reviewed to address comments that the boundary has not included areas which are in close proximity to the airport. The findings of this review and any subsequent amendments to the boundary should be agreed with the local authorities in advance.	The extent of the LSA will be reviewed to ensure that all neighbouring communities around the Airport are included as appropriate. Further work is being undertaken and the findings will inform the ES assessment and be shared at future TWGs as appropriate.	Paragraph 7.4.11 of ES Chapter 17 Socio-Economic (APP-042).
4	Additional information on construction employment	Issues have been raised regarding the scale of impacts of the construction workforce in housing and local infrastructure during the construction phase.	More detailed analysis of the construction employment expected to be generated will be provided to include quantum, skills and origin/commuting data to inform the assessment (subject to data availability). Further work is currently undertaken and the findings will inform the ES assessment and be shared at future TWGs as appropriate.	Section 17.9 of ES Chapter 17 Socio-Economic with a more detailed analysis of the construction employment provided in Appendix 17.9.1 (APP-199) and the potential housing effects are analysed in Appendix 17.9.3 (APP-201).
5	Impacts on the labour market	GAL to clarify precisely what adverse labour market issues it is expecting, in terms of nature and scale.	We are currently undertaking further analysis, and the findings will inform the ES assessment and be shared at future TWGs as appropriate. At this stage, there is no further information that can be provided. Any significant adverse effect will be subject to mitigation measures, and in particular, those in relation to labour supply will be primarily the focal point of the emerging ESBS.	Para 17.9.5 onwards of ES Chapter 17 Socio-Economic (APP-042) and Appendix 17.9.2 Local Economic Impact Assessment (APP-200).
6	Supporting Information (Economic Strategies and Policies)	Various Studies provided by LPAs.	Noted. These will be reviewed and included within the analysis as appropriate.	Table 17.2.3 of ES Chapter 17 Socio-Economic (APP-042) sets out the other local authority economic strategies considered
7	Sensitivity & Magnitude	The significance of the effect upon socio-economics has been determined by taking into account the sensitivity of the receptor and the magnitude of the impact. Where a range of significance levels is present, the final assessment for each effect is based upon professional judgement. Clarification could be provided as to the justification for undertaking qualitative and quantitative assessments.	For the ES Chapter sensitivity and magnitude will be <b>defined in more detail</b> using quantitative thresholds (as appropriate).	Section 17.4 of ES Chapter 17 Socio-Economic (APP-042) sets out in detail the updated approach adopted in the ES in relation to defining magnitude and sensitivity.
8	Impact on Land Values	The effect of the development on property values on residential and commercial properties outside the Project area has not been scoped due to no change to flightpaths. However, there is the potential for properties to be impacted from the intensification of flights on existing flightpaths.	Impacts on residential property values have not been included in scoping for other comparable DCO projects (e.g. Heathrow, Manston, Luton). However, GAL is commissioning a study that will investigate the potential impacts on residential property values to inform the ES assessment.	GAL has not included a specific assessment of effects on property prices in the ES for the reasons set out in Table 17.4.2 of ES Chapter 17 Socio-Economic (APP-042).
9	Baseline	The data does not take the pandemic and the effects of unemployment rates into account which may have been influenced by the Government's furlough scheme. The implications of this are only just emerging and potentially will not be understood for years to come.	The approach adopted considers that a pre-pandemic position is the appropriate and more representative baseline of socio-economic conditions in the longer-term as opposed to the use of specific data points associated with the period of the Covid-19 pandemic when there was significant disruption to the economy and labour market. The Covid-19 pandemic is expected to have a limited influence on the Project as the effects of the pandemic are expected to have fully subsided by 2029 (the Project's 'opening year'). A variety of econometric forecasts and scenarios (including lower growth) will be assessed in the ES to justify this position.	Table 17.3.2 of ES Chapter 17 Socio-Economic (APP-042) and Section 4.5 of Appendix 17.9.2 Local Economic Impact Assessment (APP-200).
10	Cumulative schemes/Zone of influence	List of permissions does not accurately reflect the development coming forward, specifically in Tandridge. It is recommended that GAL ask neighbouring authorities to submit the planning permissions they are aware of in their respective areas that would have a cumulative effect on development within the vicinity of the airport.	Further consideration will be given at the ES stage.	Table 17.11.1 of ES Chapter 17 Socio-Economic (APP-042).

11	Housing Market Area	For Crawley/Horsham/Mid Sussex, our HMA is very similar in geographic extent to that of the NWS FEMA, so we are confused why GAL is using the HMA in one instance, but not the NWS FEMA in another.	The general approach is to use the most relevant study area to the particular type of impact being assessed. The Population and Housing Report (PHR) is concerned with housing market effects, and therefore the geographies used relate to housing market areas. Housing market areas broadly represent the geographical areas/extents to which people move when searching for housing, taking into account factors such as house prices, commuting, school catchments, etc. Because Gatwick Airport is located within the North West Sussex HMA, the PHR presents outputs for this area. However, recognising that Gatwick Airport is a regional employer and is likely to influence the labour and housing markets beyond NWS, the PHR also assesses surrounding HMAs which form the majority of Gatwick's labour catchment.	Para 17.3.13 of ES Chapter 17 Socio-Economic (APP-042) and Appendix 17.9.3 (APP-201).
12	Affordable housing	GAL should be looking at the affordable housing element as part of their methodology. Whilst GAL's approach to include additional analysis on the profiles of NRP workers and the type/tenure of housing they are likely to require is welcomed, more work will be needed to address affordability for new workers.	As part of additional tasks during Phase 2, Lichfields proposes additional analysis to assess the potential implications for the types and tenures of housing needed. This will include a review of the breakdown of jobs created as part of the project, understanding what types of housing are likely to be associated with those workers, and how this compares with likely delivery (based on trend data, SHMA evidence, local plan housing mix policies, etc) to identify any potential gaps.	Para 17.9.68 of ES Chapter 17 Socio-Economic (APP-042) and Appendix 17.9.3 (APP-201).
13	Future Housing Delivery/Methodology clarification	Concerns were raised about GAL's failure to consider future housing growth as a result of the proposed employment growth. It is noted that Slide 12 confirms that GAL will provide contextual analysis which compares recent housing delivery levels with the future growth set out in housing trajectories.	Lichfields will undertake a comparison of recent delivery levels to housing trajectories to understand any potential differences and potential impacts on the labour supply analysis. In terms of employment, Lichfields will review employment targets within adopted or emerging plans where available and compare these with the scale of growth forecast by Cambridge Econometrics. These will be reflected in the report commentary, as well as scenarios and outputs if we consider this is required. Lichfields will also review major employment generating initiatives and assess whether it is appropriate to add any of these initiatives into the forecast, and update the labour supply analysis accordingly.	Appendix 17.9.3 Assessment of Population and Housing Effects (APP-201).
14	Time period	The end date in the PHR stops at 2038, compared with 2037 in some other studies e.g. transport.	We will extend all scenarios to 2047 in the updated report.	Para 17.1.6 of ES Chapter 17 Socio-Economic (APP-042).
15	Experian forecasts	Experian forecasts are used by a number of authorities in the study area to underpin local plans and would act as a sense-check to the Cambridge Econometrics forecasts.	We will include scenarios which assess Experian employment forecasts, including their potential impacts on labour supply, in the updated report.	Para 17.4.16 Appendix 17.9.3 Assessment of Population and Housing Effects (APP-201)
16	Plan employment targets and initiatives	The PHR did not look at local job targets from individual local plans, nor did it take account of specific plan-led strategic employment initiatives, such as new business areas, which might generate additional employment growth beyond a baseline forecast.	We will review employment initiatives to assess whether it is appropriate to add any of these initiatives into the forecast and update the labour supply analysis accordingly.	Para 17.6.98 of ES Chapter 17 Socio-Economic (APP-042).
17	Recent housing delivery	The PHR does not assess a future housing scenario which is based on past trends in delivery (e.g., over 7-10 years).	We will provide contextual analysis which compares recent delivery levels with the future growth set out in housing trajectories.	Para 17.6.118 onwards of ES Chapter 17 Socio-Economic (APP-042).
18	Water neutrality	Water neutrality may impact upon the quantum of housing delivery seen in some authorities, which could have implications for the PHR and its findings.	We will generate alternative housing trajectories and further 'stress testing' of the labour supply impacts to understand whether a labour surplus would still be expected within the study area, even if delivery rates fall as a result of water neutrality issues, although it is understood the water neutrality issues will impact more in the shorter term.	Para 4.3.8 onwards of Appendix 17.9.3 Assessment of Population and Housing Effects (APP-201).
19	Type/tenure of housing needed	The PHR only considers the overall quantum of housing and its labour market impacts, not the impact the NRP may have on the type/tenure of housing required.	We will include additional analysis which profiles NRP workers and assesses the types of housing they are likely to require. We will also undertake supply analysis to understand whether this reflects likely need.	Section 7 of Appendix 17.9.3 Assessment of Population and Housing Effects (APP-201).
20	Temporary accommodation	The PHR does not assess the potential impact that temporary construction workers might have on housing need, specifically the need for short-term temporary accommodation.	We will include an assessment of the potential need for temporary accommodation, including a review of the impacts of temporary construction workers on similar scale DCOs.	Section 6 of Appendix 17.9.3 Assessment of Population and Housing Effects (APP-201).
21	Land Supply	No information has yet been published on land supply implications associated with the identified growth.	The ARELS work is ongoing. The study is assessing land supply implications associated with identified growth – consideration is being given to the existing total employment land as well as the total projected pipeline across the ARELS FEMA. Consideration is being given to LPA's assessment of their own economic growth potential and whether the LPA has a current and forecast surplus or shortfall in space. The ARELS is assessing total quantum of future airport related space. The ARELS will not assess suitability or deliverability of the land identified by local authorities – i.e., where space should be located.	Section 4 of Appendix 17.9.3 Assessment of Population and Housing Effects (APP-201).
22	Employment Allocations and Initiatives	Information on additional employment allocations and initiatives has been provided by various LPAs	The proposed and existing employment sites are noted. The ARELS is assessing land supply implications associated with identified growth – consideration is being given to the existing total employment land as well as the total projected pipeline across the ARELS FEMA. Consideration is being given to LPA's assessment of their own economic growth potential and whether the LPA has a current and forecast surplus or shortfall in space. The ARELS is assessing total quantum of future airport-related space. The ARELS will not assess suitability or deliverability of the land identified by local authorities – i.e., where space should be located.	Section 4 of Appendix 17.9.3 Assessment of Population and Housing Effects (APP-201).
23	Catalytic impacts	Saying that the methodology for catalytic impacts or net impacts will be explained in the EIA is not consistent with engagement expectations which should be seeking to agree methodologies up front.	Oxera is in the process of adjusting its methodology for estimating local impacts to account for induced impacts, which will affect the methodology for calculating catalytic and net impacts. An update on the local impacts methodology will be shared before it is finalised.	Appendix 17.9.2 Economic Impact of the Northern Runway Project: Local Impact Assessment (APP-200).
24	Air fare savings and displacement	The following points need to be addressed: The contradiction between including competitive airfare savings benefits in circumstances where no increase in capacity at other airports has been assumed; The elasticities used in relation to air fare savings; The consequences of any displacement to other airports	These matters are being considered in air traffic forecasting work and will be discussed as part of the update to the Economic Assessment.	Appendix 17.9.2 Economic Impact of the Northern Runway Project: Local Impact Assessment (APP-200).

25	Trade/FDI	Further clarification on the approach to setting out projected benefits for trade, FDI and the visitor economy are requested	Oxera is in the process of establishing a methodology to be used for estimating these impacts and intend to share the methodology before it is finalised.	Appendix 17.9.2 Economic Impact of the Northern Runway Project: Local Impact Assessment (APP-200).
26	Trade/FDI	GAL has suggested a narrative rather than quantitative approach would be taken. There have previously been economic impact assessments, so it would be helpful to clarify if these approaches will be used or if a different approach will be adopted and why e.g. Gatwick's economic contribution through trade and investment (gatwickairport.com)	Oxera is still considering the methodology to be used for estimating these impacts and may provide a quantitative assessment as an illustrative outcome. However, there are no agreed approaches to quantify this potential benefit robustly in the context of a cost-benefit analysis (i.e. without double counting impacts). See for example DfT (2017), Updated Appraisal Report Airport Capacity in the South East, p. 28.	Appendix 17.9.2 Economic Impact of the Northern Runway Project: Local Impact Assessment (APP-200).
27	Tourism	Analysis of the tourism impacts of the proposed scheme is entirely absent. Once quantified, tourism impacts are likely to be highly negative due to Gatwick's status as an airport predominantly serving UK residents and facilitating overseas spending via international tourism.	Any positive and negative impacts on spending with increased inbound and outbound tourism reflects a financial impact of tourism. EIA, however, quantifies the welfare impacts of the Project. EIA will describe the impact of tourism on UK welfare in more detail.	Needs Case Appendix 1 - National Economic Impact Assessment (APP-251)
28	User impacts	It appears that the analysis is based on a 'system-wide' average fare in different market segments. The average fare is, however, likely to be significantly different at the various London airports, reflecting the different market circumstances at each airport. This would suggest that the location of the release of capacity is likely to influence the impact on fare to some degree. It is unclear the extent to which this issue has been considered.	Oxera will provide further clarifications on the calculation behind the Project's price impact	Appendix 17.9.2 Economic Impact of the Northern Runway Project: Local Impact Assessment (APP-200).
29	Traffic forecasts	Our issue is the fundamental assumptions that feed into the analysis, notably the speed of traffic recovery and growth, and the assumptions as regards capacity development at other airports. If these change, the overall results of the economic appraisal could be quite different.	The EIA uses air traffic forecasts as an input to its analysis. The update to the EIA will consider sensitivities based on alternative traffic forecasts assuming slower growth and slower fleet transition at Gatwick.	Appendix 17.9.2 Economic Impact of the Northern Runway Project: Local Impact Assessment (APP-200).
30	COVID/Brexit	The data does not take the pandemic and the effects of unemployment rates into account which may have been influenced by the Government's furlough scheme. The implications of this are only just emerging and potentially will not be understood for years to come.	Our assessment has not factored in the impact of the pandemic to the extent that there was no evidence available that these impacts would be long-lasting (e.g. there is no evidence to suggest the furlough scheme would impact employment until 2029 and beyond). However, our baseline employment statistics would factor in any long-lasting effect of the pandemic on the local employment baseline.	Table 17.3.2 of ES Chapter 17 Socio-Economic (APP-042).
31	Study areas	The supporting Economic Impact Assessment bases its analysis on different study areas to those within the PEIR. The PEIR uses the Local Study Area and the Labour Market Area whereas the Economic Impact Assessment uses the Gatwick Diamond. This should be consistent throughout all of the consultation documents.	For the ES, the EIA will align with other socio-economic workstreams and report economic impacts at the level of the Labour Market Area for consistency	Paras 17.4.10 and 17.4.11 of ES Chapter 17: Socio-Economic (APP-042).
32	Induced impacts	There appears to be no consideration of induced effects within the economic footprint. This is slightly unusual and might suggest that job impacts are understated but the multipliers used are relatively high and some may include induced effects.	Oxera is considering how local induced effect estimates can be provided, but will also qualitatively highlight the methodological challenges with accurately estimating these impacts	Section 3 of Appendix 17.9.3 Assessment of Population and Housing Effects (APP-201).
33	Quality of employment generated	Account should be taken of the type and quality of employment being generated at the airport and how this translates into the need for different types of housing in the LSA, particularly Crawley. If a large proportion of employment being created is unskilled / semi-skilled then this can generate an increased need for more affordable housing or different housing tenures. Many of the jobs directly linked to the project appear to be lower paid / entry level.	Oxera will consider whether further information on the type of employment generated can be provided taking into account the uncertainties around the duration of employment that is not located on-site at the airport.	Section 7 of Appendix 17.9.3 Assessment of Population and Housing Effects (APP-201).
34	Net impacts	Whilst the methodology used to assess additionality seems roughly adequate and this scale of net additional employment is not unreasonable, it is likely to be on the upper end of the estimate. Further clarity on how this methodology was applied would be required.	We will provide additional information as to the net impacts methodology	Section 3 of Appendix 17.9.3 Assessment of Population and Housing Effects (APP-201).
35	Scope of the Outline Employment, Skills and Business Strategy (OESBS)	It is noted that the consultation document is an outline strategy, and a more comprehensive Employment, Skills and Business Strategy and Implementation Plan will be developed which will incorporate consultation feedback. We expect the final Strategy and Implementation Plan to provide more specific detail on the objectives, initiatives and activities, targets and milestones, and implementation processes, which are not covered in this outline strategy.	The plan will include more specific detail on the objectives, initiatives and activities, targets, milestones, implementation processes and partners, including how objectives will be met at the local level. The approach to monitoring and evaluation of actions and impacts will be included. GAL recognises that the skills, employment and business growth and productivity fields are dynamic and fast-moving in terms of national and local policy responses, skill needs and demands and technological changes. The Strategy will look forward over a period of 16 years. Thus, the strategy and implementation plan will need to incorporate capacity for the projects and associated targets and outcomes to flex and change in response effectively to changing circumstances as required.	ES Appendix 17.8.1 Employment, Skills and Business Strategy (APP-198).
36	Addressing localised need and opportunity	Currently, the strategy does not provide any specific details on initiatives linked to benefiting people living in local areas. In the final Employment, Skills and Business Strategy, we would expect to see more details of activities and initiatives linked to people living in each local authority which is part of the defined Study Area. The baseline should also aim to identify specific minority and/or marginalised groups of people and communities as well as pocket of deprivation so that these areas can be targeted, where possible.	The Strategy will address in as much detail as possible, how people living within each local authority area will benefit, based upon a more detailed socio-economic analysis to inform and support implementation. e.g. actions to enhance social mobility will be targeted at pockets of multiple deprivation across the local area as well as target groups facing multiple barriers to engagement with the labour market; and we will connect with individual organisations, partnerships and existing and planned infrastructure with excellent links into local communities to make this happen. We would particularly welcome the potential to address very localised circumstances and priorities that would be highlighted through the baseline analysis that AECOM recommends that local authorities conduct, described in 3.226 of the Statutory Consultation Socio-Economics Response.	ES Appendix 17.8.1 Employment, Skills and Business Strategy (APP-198).

37	Analysis of existing training/education providers	The Outline ESBS does not provide a baseline analysis of existing education/training providers. This is critical to identifying what additional provision may be required and where there may be opportunities to build on the existing offer of these providers. We would expect the final Strategy and Implementation Plan to include analysis of existing training/education providers.	GAL has engaged two external education, skills and business stakeholder advisers, who collectively represent key, strategic education, training and business and regional growth and development infrastructure, including the Coast to Capital LEP, the Chichester College Group and the wider collective of providers spearheading the Institute of Technology and Gatwick Diamond Business/Initiative. They are supporting GAL to scope how to connect with existing providers and collaborations of providers. The Implementation Plan will list the core strategic education and training providers that we expect to work with, but will not include a full analysis of providers.	Section 17.6 of ES Chapter 17 Socio-Economics (APP-042) and Para 5.3.45 of ES Appendix 17.8.1 Employment, Skills and Business Strategy (APP-198).
38	Additional information on construction employment	The OESBS suggests that demand for construction workers will exceed the skilled labour available without clearly identifying the geographical area impacted by this labour shortage.	To be informed by more detailed projections. The Construction Industry Training Board and the Civil Engineering Contractors Association have been engaged as advisors. Actions to address recruitment gaps include: working towards GAL accreditation as a National Skills Academy for Construction Training - a key hub and spoke initiative that will enable GAL to connect with skills provider networks and existing and potential talent pools from a range of private, public and community sector partnerships. GAL is keen to partner with other NSAFCT accredited organisations (notably the Crawley NSAFCT) to maximise opportunities to collaborate in recruiting to the sector across a range of housing and wider infrastructure projects.	Section 17.6 of ES Chapter 17 Socio-Economics (APP-042) and Para 2.2.11 of ES Appendix 17.8.1 Employment, Skills and Business Strategy (APP-198).
39	GAL's upskilling role	It is expected that the final Strategy will provide greater detail on the list of bespoke training needs and programmes including the external training providers. Will GAL fund or facilitate connections between prospective construction workers to existing provision	In order to complement rather than duplicate, use of existing training provision will be maximised. In practice, this will be supplemented by additional, customised provision. GAL will both refer candidates to existing provision and fund additional elements.	Para 5.3.6 of ES Appendix 17.8.1 Employment, Skills and Business Strategy (APP-198).
40	Inclusion of SMEs in the supply chain	How will GAL ensure, through the procurement process, that SMEs are included in contract supply chains.	The CITB, CECA, Gatwick Diamond Business and Chambers of Commerce will support GAL to develop and deliver regular and timely promotional and awareness campaigns – potential supplier events to promote opportunities; training to convey skills, knowledge, expertise, protocols and processes that will be required of suppliers; and production of local supplier database – activity to be incorporated into overall monitoring and evaluation framework.	Table 5.2 of ES Appendix 17.8.1 Employment, Skills and Business Strategy (APP-198).
41	Optimising opportunities for local people to gain operational jobs	Identification of a requirement for training remains unclear in terms of numbers and skills. How will needs be addressed in practice. There is no indication on how opportunities for local people will be maximised	Employment and skills need and demand landscape will have dramatically changed by 2029. Methods for engagement with local communities will include advertising vacancies in advance of wider recruitment; outreach into local communities; engaging with local schools and colleges; working collaboratively with the Department for Work and Pensions/Jobcentre Plus to support job seekers into work; and conducting local awareness-raising campaigns, including use of social media.	Section 3.1 of ES Appendix 17.8.1 Employment, Skills and Business Strategy (APP-198).
42	Exploiting inward investment opportunities	Reference to the potential to develop a clear regional identity is brief and vague and this should be explained in further detail,	The ESBS Implementation Plan will describe how GAL will collaborate with partners to define and implement a clear regional 'identity' and promotion strategy. Initial scoping research, informed by a partner workshop, has just completed and the recommendations will inform the Implementation Plan.	Section 4.2 of ES Appendix 17.8.1 Employment, Skills and Business Strategy (APP-198).
43	Engagement in ESBS development	Limited stakeholders are being engaged to inform the detailed plan. Can we receive update on the engagement approach and to potentially widen participation, including through consideration of the Local Skills Improvement Plan (hosted by Sussex Chamber of Commerce). LAs have business support/training provider connections that GAL may wish to engage with e.g. Recover and RISE	We continue to work with Jeff Alexander of Gatwick Diamond Business and Initiative and Julie Kapsalis, Chair of C2C LEP and Catalyst South (now employed by NESTA), to advise on key strategic issues. We held 4 Round Table meetings in June with Businesses, Business Membership and Representative organisations (including Sussex Chamber) and education and training providers. GAL pilot recruitment actions have resulted in collaborative working with DWP, Jobcentre Plus, Colleges (including the Chichester Group and NEScot) and locally focused charitable organisations e.g. Sand Project on SEND. GAL has participated in the development of the LSIP and our proposals will contribute to priorities identified. GAL policy and engagement and innovation teams met with the RISE Head of Project at Brighton University 15th June to discuss innovation collaboration potential. On completion of more detailed socio-economic analysis, GAL will invite discussions with local authorities on our proposals to reach communities and engage with training and business engagement infrastructure. Employ Crawley will be included in brokerage and outreach activity and we welcome collaborative working with Crawley NSAFc.	Para 2.2.5 onwards of ES Appendix 17.8.1 Employment, Skills and Business Strategy (APP-198).
44	Differentiate BAU and NRP ESBS	ESBS should reflect the baseline and be clear about what additional activities will be provided over and above business as usual?	GAL is developing two parallel work streams. The first supports the achievement of GAL's Decade of Change. The other is specific to the proposed Northern Runway Project – actions that will only be delivered if we secure consent. Some strands are common to both, but the scale, precise form and level of resource that can be set in place to support these work streams would be dependent upon receipt of approval for the Northern Runway project.	Section 17.6 of ES Chapter 17: Socio-Economic (APP-042).
45	Regional Promotion	Partners aware of a C2C commissioned report on inward investment and growth. Can clarity be provided on the role of this work in supporting GAL's ambitions within current growth plans, and also as part of expansion proposals? Mid Sussex is promoting the District via our inward investment strategy/brand.	GAL commissioned the Airport Economic Zone research (reporting this summer) to identify how airports and other stakeholders effectively promote regions around airports and stimulate inward investment. The aim is to encourage discussion and plans for collective working by GAL and partners to define a clear 'identity' for our region, emphasising economic strengths and opportunities, and showcase the area for inward investors as part of Global Britain. The work aims to inform the strengthening of collaborative working to promote a healthy, resilient economy as we emerge from the pandemic. It will also inform future more substantial investments by GAL to maximise opportunities that would be enabled by the Northern Runway Project.	Table 5.6 of ES Appendix 17.8.1 Employment, Skills and Business Strategy (APP-198).

46	Baseline Assumptions Capacity and Forecasts	Planning B (Forecasting & Capacity) TWG appears to have raised some fundamental queries as to assumptions and information feeding into GAL's baseline. This is a fundamental issue that cuts across TWGs. It is critical that forecast and capacity are correctly assessed, as other assumptions and forecasts (including socio-economic) will stem from this.	GAL is currently preparing a responses to matters raised in the Planning B (Forecasting & Capacity) TWG on forecasts. A separate Planning B (Forecasting & Capacity) TWG has been arranged to consider capacity matters raised by York. GAL remains confident that its future baseline and NRP core case forecasts represent a reasonable and robust basis for environmental and economic impact assessment.	Section 17.6 of ES Chapter 17: Socio-Economic (APP-042).
47	Baseline Assumptions Capacity and Forecasts	Welcome that changed circumstances since the last round of consultation, including cost of living increases and rising fuel costs (both of which could impact upon leisure and business flights), will be revisited in the baseline.	Slower growth sensitivity cases were considered in the Economic Impact Report. GAL is reviewing the basis of this to update the assessment including: Slower recovery from COVID; reduced / slower take up of demand due to other factors including slower economic growth; Assumptions on reduced aircraft size and load factors, and seasonal spreading;	Annex 2 Slow Growth Sensitivity of ES Appendix 17.9.2 Economic Impact of the Northern Runway Project: Local Impact Assessment (APP-200).

Ref	Subject	Description	GAL Response provided in August 2022	Signposting to DCO application
1	Future Baseline Projects	Gatwick Rail Station Expansion Development (South Terminal) (Category 1)	Category 1 Development that is under construction, or on which a material start has been made. Assumed in baseline as expected to come forward irrespective of the Northern Runway Project.	Para 4.4.10 of ES Chapter 4 Existing Site and Operation (APP-029)
2	Future Baseline Projects	Pier 6 Western Extension (North Terminal) (Category 1)	Category 1 Development that is under construction, or on which a material start has been made. Assumed in baseline as expected to come forward irrespective of the Northern Runway Project.	Para 4.4.2 of ES Chapter 4 Existing Site and Operation (APP-029)
3	Future Baseline Projects	Echo Romeo Rapid Exit Taxiway Runway 23 (Category 1)	Category 1 Development that is under construction, or on which a material start has been made. Assumed in baseline as expected to come forward irrespective of the Northern Runway Project.	Para 4.4.4 of ES Chapter 4 Existing Site and Operation (APP-029)
4	Future Baseline Projects	Hilton MSCP (South Terminal) (Category 1)	Category 1 Development that is under construction, or on which a material start has been made. Assumed in baseline as expected to come forward irrespective of the Northern Runway Project.	Para 4.4.6 of ES Chapter 4 Existing Site and Operation (APP-029)
5	Future Baseline Projects	Electric Vehicle Charging Forecourt (South Terminal) (Category 2)	Category 2 Development which although not under construction has a planning permission including a permission granted by the Town and Country Planning (General Permitted Development) Order 2015. Assumed in baseline as expected to come forward irrespective of the Northern Runway Project.	Para 4.4.8 of ES Chapter 4 Existing Site and Operation (APP-029)
6	Future Baseline Projects	Multi Storey Car Park 7 (North Terminal) (Category 3)	Category 3 Development which doesn't yet have planning permission but is reasonably expected to gain permission, including a permission granted by the Town and Country Planning (General Permitted Development) Order 2015. Assumed in baseline as expected to come forward irrespective of the Northern Runway Project.	Para 4.4.6 of ES Chapter 4 Existing Site and Operation (APP-029)
7	Future Baseline Projects	Robotic Car Parking (South Terminal) (Category 3)	Category 3 Development which doesn't yet have planning permission but is reasonably expected to gain permission, including a permission granted by the Town and Country Planning (General Permitted Development) Order 2015. Assumed in baseline as expected to come forward irrespective of the Northern Runway Project.	Para 4.4.6 of ES Chapter 4 Existing Site and Operation (APP-029)
8	Future Baseline Projects	South Terminal Welcome Roundabout - minor highway works within the highway boundary (Category 3)	Category 3 Development which doesn't yet have planning permission but is reasonably expected to gain permission, including a permission granted by the Town and Country Planning (General Permitted Development) Order 2015. Assumed in baseline as expected to come forward irrespective of the Northern Runway Project.	Para 4.4.9 of ES Chapter 4 Existing Site and Operation (APP-029)
9	Future Baseline Projects	North Terminal Welcome Roundabout - minor highway works within the highway boundary (Category 3)	Category 3 Development which doesn't yet have planning permission but is reasonably expected to gain permission, including a permission granted by the Town and Country Planning (General Permitted Development) Order 2015. Assumed in baseline as expected to come forward irrespective of the Northern Runway Project.	Para 4.4.9 of ES Chapter 4 Existing Site and Operation (APP-029)

Ref	Subject	Description	GAL Response in August 2022	Signposting to DCO application
1	Transport Strategy	At a high level, we still do not feel that we're having our concerns answered in respect of fundamentals around GAL's transport strategy and the surface access proposals that are coming out of that. It still seems as though the strategy of providing for forecast growth is dictating the transport solution and, given that the current demand is primarily car based, that will be the future profile. We still need to see greater detail around the intended Passenger Transport options, including rail and long-distance coach	We are committed to increasing the share of journeys made by sustainable modes. However, private car use will continue to be an important consideration in our access proposals. Our strategy takes account of all forecast trip-making, both for the airport and for non-airport journeys. Our modelling methodology allows us to assess the impact of growth in airport related car trips, albeit at a lower mode share, alongside non-airport background growth. This is being used to determine the need for improvements to the road layout. Our proposed highway design provides the level of enhancement required for forecast road traffic up to 2047 allowing for a shift to sustainable modes. We will set out further thinking on bus and coach improvements in future Topic Working Groups and will provide full details in the DCO submission.	Sections 3, 9, 10, 11 and 14 of the Transport Assessment (APP-258) and Section 4 of ES Appendix 5.4.1 Surface Access Commitments (APP-090).
2	Modal Split Targets	We have requested more challenging modal split targets and will be interested in the scenario testing around this	We will provide further information regarding mode split targets along with our analysis of transport model outputs in coming months. GAL believes it's targets are already challenging and exceed those put forward by other UK airports seeking to grow. It is important that the targets are realistic and achievable, based on sound analysis.	Section 4 of ES Appendix 5.4.1 Surface Access Commitments (APP-090) and Annex B Strategic Transport Modelling Report of the Transport Assessment (APP-260).
3	Car Parking	We noted that the net increase parking totals now appear lower than implied in statutory consultation - an additional 4,200 for the Northern Runway growth in passenger numbers? This prompts some queries around the relationship between these figures and the level of change proposed to the road network. We query whether as GAL has no control over off airport unauthorised spaces, additional spaces should be provided based on the assumption that unauthorised spaces will be taken out of circulation. We noted that parking that might be granted with associated developments, such as hotels and offices, has not been included in totals.	This is correct, our proposals for net additional spaces for Northern Runway Project is 4,200 spaces, including on-airport provision to balance the loss of unauthorised off-airport spaces. This is also set out in our Summer 2022 Consultation, which asks for views on this approach. Additional passenger parking demand from the Northern Runway Project is only one of several contributors to road traffic. Passenger parking spaces are occupied for around 10 days on average and so one space typically generates an arrival and departure trip only once every 10 days. This compares with daily drop off/pick up airport trips, taxi journeys and background non-airport journeys which make up a larger proportion of daily trips and therefore have a greater impact on the required road capacity. No additional parking will be offered with new offices included within the Northern Runway Project. Proposals for new hotels assume a ground lease of a certain area and while prospective hotel providers may propose limited ground floor parking underneath a hotel building above this would be a commercial decision for them. Only limited additional spaces could be created in this way and restrictions on the height of the building (associated with aerodrome safeguarding) means ground floor parking would reduce the space available for hotel rooms or other facilities.	Section 6.7 of the Transport Assessment (APP-258) and Section 2.3 of the Transport Assessment (APP-258) which sets out that there will be a net increase of up to 1,100 car parking spaces.
4	Active Travel	We would like to see more linkages for active travel coming out of South Horley, directly into North Terminal, and using the public rights of way either side of the main London to Brighton railway line from Horley into the South Terminal and station.	Topic Working Group 2 set out thoughts on active travel links, particularly between Horley and the airport. We have also set out our approach to managing active travel routes during construction.	Section 4 of the Transport Assessment (APP-258).
5	Active Travel	Slide 8 of TWG 1 mentions that highway network effects will include flows and performance across the Strategic Road Network – will roads on the local road network also be included?	We will provide flows and other model outputs for relevant links and junctions throughout the local network and on the strategic road network.	Section 12.9 of ES Chapter 12 Traffic and Transport (APP-037).
6	Active Travel	Slide 17 of TWG 1 mentions that engagement with Local Highway Authorities is ongoing – what is the programme for these engagements, and can these involve National Highways given that the proposed highway improvements will directly affect all four highway authorities (NH, WSCC, SCC, GAL)?	GAL has a MoU covering its engagement with National Highways, which covers a number of areas for discussions, some of which should remain bilateral. We have also met with representatives from West Sussex CC and Surrey CC in relation to both our concept design and modelling approach. We anticipate these meetings will continue through to DCO submission and will support a Statement of Common Ground with each party.	Section 12.3 of ES Chapter 12: Traffic and Transport (APP-037) sets out a summary of consultation and engagement.
7	Active Travel	Slide 24 of TWG 1 mentions that parking charges for passengers are being tested in the model – why not test the effect of applying parking charges for employees to encourage them to use sustainable modes?	Our model is testing different options for constraining staff parking as well as passenger parking. This considers both pricing and availability since we have different approaches that we could take and greater flexibility on incentives for sustainable travel, particularly for those living closest to the airport.	Section 6 of the Transport Assessment (APP-258).  Commitments 11 and 12 of ES Appendix 5.4.1 Surface Access Commitments (APP-090).  Section 12.8.3 onwards of ES Chapter 12: Traffic and Transport (APP-037).
8	Coach Strategy	Slide 25 of TWG 1 lists 6 new coach routes – how have these coach routes been identified and what market testing has taken place (or is planned)?	We will provide further detail on the approach to increasing public transport mode share in the next Topic Working Group. The choice of routes is plotted against areas where there are significant numbers of people travelling to Gatwick but currently a relatively low public transport mode share. The higher number of people means there is a greater chance of sustaining a viable service in the future. We have excluded areas already served by frequent, direct rail links as these would be more attractive than bus/coach.	Para 5.2.1 and 5.2.2 of ES Appendix 5.4.1 Surface Access Commitments (APP-090).  Section 11.3 of the Transport Assessment (APP-258).

9	Local Bus Enhancements	Slide 26 lists bus service frequency enhancements – how have these been identified and what market testing has taken place (or is planned)?	A similar approach has been taken for local bus services, improving connectivity and frequency in order to stimulate a higher mode share, where there are considerable number of staff trips but public transport is not achieving the share we would like to see.	Para 5.2.1 and 5.2.2 of ES Appendix 5.4.1 Surface Access Commitments (APP-090).  Section 11.3 of the Transport Assessment (APP-258).
10	Car Parking Strategy	Parking – how will the revised parking proposals support the achievement of the sustainable transport mode share targets?	By limiting the number of additional spaces provided we are decreasing the number of spaces available per million passengers. We are also increasing the cost of on-airport parking and forecourts relative to other modes. Because GAL does not control the pricing and supply of all parking (only on-airport parking) there is a balance to be struck so that passengers don't choose off-airport parking, rather than shift to sustainable modes.	Section 12.8.3 onwards of ES Chapter 12: Traffic and Transport (APP-037).  ES Appendix 5.4.1 Surface Access Commitments (APP-090).
11	Surface Access Mitigations Strategy	As GAL will be aware, we raised a number of comments in relation to Traffic and Transport issues and at this stage it is difficult to see how GAL is planning to respond to this feedback. Much of the focus for the discussions on Surface Access mitigation is on the immediate impact on and around the Airport, with little acknowledgement of the wider transport impacts beyond the immediate airport. GAL is projecting a significant uplift in passenger throughput which will have implications for travel within the District, particularly given the potential for in combination effects as a result of planned and potential further development. For example, the A264 is an important east-west route connecting Horsham with Crawley, the A24 to the west and the M23 to the east, and forms an important part of the road network providing forward destination links to and from the Airport.	The area on and immediately around the airport sees the greatest impact as a result of the Northern Runway Project and it is important that our mitigation is acceptable to National Highways and the Local Highway Authorities. We are studying the wider transport impacts and have explicitly covered a wide area in our transport model for this purpose. This includes the routes mentioned. All A-roads, all B-roads and most C-roads within 25-30 kilometres of the airport along with unclassified roads close to the airport are included in the highway model. These models are being analysed to determine if specific mitigation is required at other locations and, should this be the case, details will be shared with stakeholders. We continue to develop potential improvements for public transport and active travel that will help to reduce the impacts of road traffic.	Section 12.9 of ES Chapter 12 Traffic and Transport (APP-037).  ES Appendix 5.4.1 Surface Access Commitments (APP-090).
12	Impacts on wider transport network	The Council would therefore like to understand, in detail, what work is being undertaken on understanding the impacts on the wider transport network beyond the immediate airport boundary and when and how these findings will be shared and discussed with the local authorities. The Council also wishes GAL to note that we have presented concerns for potential impacts on the A264 in this response as one example, however, these concerns can equally be applied to other important A roads in the District, including the A24, A29, A272 plus rural routes, which we know suffer from rat running as those travelling to and from the Airport look to avoid congestion on main routes.	Our transport models provide detail of the change in traffic flow and speed on the network, allowing comparison of the existing network with and without background growth (i.e. the existing network, with committed improvements but with no Northern Runway Project) and between the future baseline and with the project. This allows us to compare the operation of the existing network against the incremental change with the project, including our highway proposals. This analysis uses planning data for developments provided by the LPAs. The models cover a wide area and include all the routes mentioned. We also have a modal choice model that includes local bus routes, coach services to and from the airport and the regional railway network for the South East. We are therefore able to present changes resulting from the Northern Runway Project on all travel routes across a wide area and separate these effects from background levels that would occur without the project.	Section 12.9 of ES Chapter 12 Traffic and Transport (APP-037).  Commitment 14 of ES Appendix 5.4.1 Surface Access Commitments (APP-090).
13	Car Parking Strategy	At this stage, it is difficult to comment effectively in the absence of a detailed and robust Car Parking Strategy that carefully considers and justifies the car parking requirements of the Northern Runway Project (NRP). A Car Parking Strategy would also need to be intrinsically linked to the Transport and Sustainability Strategies for the Northern Runway Project. Currently, the parking proposals lack any robust justification for the number of spaces. In justifying the level of parking spaces GAL will also need to carefully demonstrate how modal shift aspirations will be achieved.	We have set out our proposals to reduce the amount of car parking provided per million passengers both with and without the project. Our current proposals assume only 4,200 net, additional spaces to cater for Northern Runway Project growth. This assumes that we will increase the efficiency of how we use spaces during the year (noting that overall capacity is related to our summer peak period). The number of spaces reflects a gradual reduction in parking mode share, assisted by proposals to increase parking charges and improve public transport provision. Our transport models include measures to attract people to sustainable modes and this will be used to develop our mode share targets. A Parking Strategy and Surface Access Strategy will be prepared and included in the DCO. Further information will be provided on mode share targets in future Topic Working Groups.	Section 12.8.3 onwards of ES Chapter 12: Traffic and Transport (APP-037).  ES Appendix 5.4.1 Surface Access Commitments (APP-090).
14	Car Parking Strategy	The Council has had regard to the 2019 Annual Parking Survey that the local authorities adjacent to the airport jointly undertake (the 2019 Survey being the most recent pre-pandemic survey). At the time, this Survey identified that there were 16,508 vacant authorised spaces in total (with 12,070 spaces on-airport and 4,438 authorised spaces off-airport). Additionally, the Parking Survey found that there were 6,644 unauthorised spaces.	Through our Section 106 commitments GAL will continue to ensure that all parking capacity for airport growth is provided on-airport, as the most sustainable location for these trips.	Section 12.8.3 onwards of ES Chapter 12: Traffic and Transport (APP-037).  ES Appendix 5.4.1 Surface Access Commitments (APP-090).
15	Car Parking Strategy	The Council considers that these findings demonstrate that, despite the large provision of authorised spaces available to airport users, unauthorised car parking facilities still exist. The approach of solely providing additional car parking at the Airport fails to properly consider other important factors, such as the implications of pricing in the choices airport users make, again something which could be addressed in a robust Car Parking Strategy. The Council considers that all locations within the airport boundary will remain the most sustainable places for airport parking and all such facilities should be convenient, safe and secure and priced to make illegal off-airport parking less attractive.	GAL seeks to strike a balance between providing sufficient capacity on airport whilst also promoting a reduction in parking demand without this demand migrating to off-airport parking. Note, if on-airport parking becomes less attractive past evidence indicates many passengers will choose other places to park or shift to taxis and pick up/drop off before changing to public transport.	ES Appendix 5.4.1 Surface Access Commitments (APP-090).  Section 12.8.3 onwards of ES Chapter 12: Traffic and Transport (APP-037).

16	Car Parking Strategy	As currently presented and in the absence of a cogent approach to the provision of car parking facilities for the NRP, it is difficult for the Council to effectively comment on the most appropriate requirements to serve the development and provide the optimum solution for minimising the negative impacts of unauthorised parking in the District.	GAL has provided an updated approach to parking on-airport and we have set out proposals to limit the number of additional spaces provided, alongside measures to attract people to sustainable modes. GAL will continue to support LPAs exercise their powers to limit off-airport parking.	ES Appendix 5.4.1 Surface Access Commitments (APP-090).  Section 12.8.3 onwards of ES Chapter 12: Traffic and Transport (APP-037).
17	Coach Strategy	The consideration of a Coach Strategy and the assessment of high frequency routes, including a route from Worthing through Horsham is welcomed. Can GAL please provide more details on what this assessment encompasses and how it is being undertaken. The Council is assuming that routes are being tested through the provision of temporary coach services. If this is the case, can GAL please confirm how these routes are being promoted to attract travelers.	We will provide further detail on the approach to increasing public transport mode share in the next Topic Working Group. The choice of routes is plotted against areas where there are significant numbers of people travelling to Gatwick but currently a relatively low public transport mode share. The higher number of people means there is a greater chance of sustaining a viable service in the future. We have excluded areas already served by frequent, direct rail links as these would be more attractive than bus/coach. We have not developed a marketing strategy for these routes, it is far too early to do so. Our analysis of how popular they would be is based on the modelling undertaken for the project.	Section 12.8.3 onwards of ES Chapter 12: Traffic and Transport (APP-037)  Commitment 5 of ES Appendix 5.4.1 Surface Access Commitments (APP-090)
18	Coach Strategy	It would be helpful if GAL could also advise what assessment of the success (or otherwise) of the schemes is being undertaken. We are keen to understand the findings of the assessment and potential outcomes. Additionally, it would be helpful to understand if sections of the routes are being assessed and what this may mean for delivery of coach services, e.g. if part of a route was underused, but uptake of the service increased at a certain point, what implications would this have for the viability and provision of the route.	The detailed analysis of the routes is still being developed but we will be able to provide further detail in future Topic Working Groups. In all cases we expect the introduction of these routes to require commercial negotiations between GAL and service providers to ensure the services are given the best chance of success. This may require services to be adapted over time to best represent the needs and behaviour of passengers	Para 12.8.3 onwards of ES Chapter 12: Traffic and Transport (APP-037).  Commitment 5 of ES Appendix 5.4.1 Surface Access Commitments (APP-090).
19	Local Bus Enhancements	It is noted on slide 24 that GAL is "testing a series of upgrades to existing local bus services". Can GAL please expand on this and identify if any upgrades are being tested and could be delivered within Horsham District. It would be helpful to understand if a collaborative approach is being undertaken for this work, i.e. to work with developers and bus companies to consider a more strategic approach to the provision of services.	Further information will be provided in the next Topic Working Group. The modelling considers passengers' choice of all modes, which is based on relative journey times compared with other modes. In the case of Horsham rail services provide considerably quicker journeys than local bus services and as a result, the models indicate that new or enhanced bus services would not attract sufficient passengers and would therefore be unsustainable.	Section 7.3 of the Transport Assessment (APP-258). ES Appendix 5.4.1 Surface Access Commitments (APP-090).
20	Local Bus Enhancements	The Council notes on slide 26 that no local bus enhancements have been identified for routes travelling from anywhere in Horsham District to the Airport. The Council considers this to be a missed opportunity and we would like to receive, in writing, justification why GAL has chosen not to identify enhancements for bus services within the District, particularly given the proximity of the District to the Airport.	We are aware that additional bus services will be provided to serve the West of Ifield development and these will be included in our cumulative development test to connect to Gatwick for employee journeys to work.	Para 5.3.20 of the Transport Assessment (APP-258). ES Appendix 5.4.1 Surface Access Commitments (APP-090).
21	West of Ifield	It is understood that the quantum of development at Land West of Ifield that is being assessed as part of the additional sensitivity testing is based on the EIA Scoping details (between 3,250 – 4,000 dwellings).	Comments relating to planning will be addressed by other Topic Working Groups.	Para 5.3.20 of the Transport Assessment (APP-258)
22	West of Ifield	As GAL will be aware, revisions to the National Planning Policy Framework (NPPF) made in July 2021, set out that "where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery" (para 22).	Our modelling reflects local plan information provided by each LPA. The proposal for 3,250 dwellings is included in our cumulative development test based on information supplied by Homes England.	Para 5.3.17 of the Transport Assessment (APP-258)
23	West of Ifield	GAL will also be aware that Homes England has identified a wider strategic opportunity area to the west of Crawley for 10,000 new homes. Within this context, the Council considers that there is a requirement for GAL to consider the impact of 10,000 new homes in this location and to specifically assess what the cumulative impacts of this significant development would be in conjunction with the Northern Runway Project.	The transport modelling follows DfT's Transport Appraisal Guidance (TAG) advice relating to the treatment of growth, including specific developments that are "near certain" or "more than likely" in core scenarios and "reasonably foreseeable" in sensitivity tests. These scenarios will be tested to a 2047 time horizon.	Para 5.3.18 onwards of the Transport Assessment (APP-258)
24	Car Parking Provision	MVDC acknowledges the clarification on the net increase of parking spaces, now proposed to be 4,200 spaces on site at the airport (please note MVDC's use of GAL's previous figures in our 'Planning A' comments dated 24 May 2022). It is still not clear whether this reduced figure has taken into account the additional parking need that will be associated with new facilities that will be built as part of the NR project, such as hotels and offices, or those developments that do not fall within the Nationally Significant Infrastructure Project (NSIP).	The allocation of 4,200 spaces allows for the reduction in unauthorised off-airport parking, as stated in our presentation to the first Topic Working Group and set out in our Summer 2022 consultation material. No additional parking will be offered with new offices included within the Northern Runway Project. Proposals for new hotels assume a ground lease of a certain area and while prospective hotel providers may propose limited ground floor parking underneath a hotel building above this would be a commercial decision for them. Only limited additional spaces could be created in this way and restrictions on the height of the building (associated with aerodrome safeguarding) means ground floor parking would reduce the space available for hotel rooms or other facilities.	Section 2.3 of the Transport Assessment (APP-258).  Section 12.8.3 onwards of ES Chapter 12: Traffic and Transport (APP-037).  ES Appendix 5.4.1 Surface Access Commitments (APP-090).

25	Modal Shift	GAL is responsible for achieving a modal shift away from private cars. MVDCs current and future policies (draft Policy INF6) would further encourage the use of alternative sustainable travel modes. However, providing for GAL's forecasted growth appears to be what is driving the transport strategy and its surface access proposals. Given that the current demand is primarily car based, it appears as though private car use is also going to be the future profile. MVDC considers it essential that GAL demonstrate the justified growth needs that will be generated by the NR project and provide greater detail on GAL's intended Passenger Transport options before the ES is finalised. Only once these needs have been demonstrated a transport strategy can address modal shift.	We are committed to increasing the share of journeys made by sustainable modes. However, private car use will continue to be an important consideration in our access proposals. We have set out that the growth in airport related car trips, even at a lower mode share, and the non-airport background traffic growth triggers the need for investment in roads around the airport. This is to ensure that they provide capacity for the future and avoid the network becoming congested. GAL proposes to fund these improvements in connection with the Northern Runway Project. Measures to attract passengers and staff to sustainable modes are being developed and tested using our transport models, to demonstrate the proposals have the desired impact.	Para 8.6.13 onwards of the Transport Assessment (APP-258)  ES Appendix 5.4.1 Surface Access Commitments (APP-090)
26	Car Parking Strategy	Further to the above point, given the drastically reduced quantum of parking spaces to cope with the Northern Runway passenger number growth, MVDC queries the need for GAL to provide the significant level of changes to the road network surrounding the airport.	Our modelling methodology allows us to assess the impact of growth in airport related car trips, albeit at a lower mode share, alongside non-airport background growth. This is being used to determine the need for improvements to the road layout. Our proposed highway design provides the level of enhancement required for forecast road traffic up to 2047 allowing for a shift to sustainable modes. Additional passenger parking demand from the Northern Runway Project is only one of several contributors to road traffic. Passenger parking spaces are occupied for around 10 days on average and so one parking space typically generates an arrival and departure trip only once every 10 days. This compares with daily drop off/pick up airport trips, taxi journeys and background non-airport journeys which make up a larger proportion of daily trips and therefore have a greater impact on the required road capacity.	Para 6.2.10 of the Transport Assessment (APP-258)  Section 12.8.3 onwards of ES Chapter 12: Traffic and Transport (APP-037).  ES Appendix 5.4.1 Surface Access Commitments (APP-090).
27	Car Park Charges	MVDC awaits to see the finalised proposals for the public and sustainable transport upgrades in future TWGs, particularly improved local bus services. MVDC also keenly awaits the testing outcomes of the increased forecourt and car parking charges, designed to encourage the use of sustainable modes of transport to see whether this alters GAL's proposals ahead of the DCO submission.	Noted. Further information will be provided in future Topic Working Groups.	Para 6.7.2 onwards of the Transport Assessment (APP-258)  Section 12.8.3 onwards of ES Chapter 12: Traffic and Transport (APP-037).  ES Appendix 5.4.1 Surface Access Commitments (APP-090).

Ref	Subject	Description	GAL Response provided in August 2022	Signposting to DCO application
1	Ground Investigation	The report summaries appear to be made in broad accordance with the relevant British Standards. However further engagement between GAL and RBBC will be needed on the proposed works within the borough boundary.	RBBC will be consulted on each step of the ground conditions related works from scoping of initial ground investigation (if required) through to remediation strategy and verification, where necessary. This will be the case for all LPAs.	Section 10.3 of ES Chapter 10: Geology and Ground Conditions (APP-035)
2	Mineral Resource	Little evidence in the PEIR has been submitted regarding the impact on the geology beneath Museum Field and land stability following the re-profiling of the land to form the flood compensation scheme.	A mineral resource assessment (MRA) is to be undertaken as part of the project (planned as part of the ES submission), with opportunities for reuse to be explored. Further ground investigation with slope stability assessment will be completed to inform detailed design.	ES Appendix 10.9.2 Mineral Resource Assessment (APP-139)  Table 10.8.1 & Paragraph 10.4.8 of ES Chapter 10: Geology and Ground Conditions (APP-035)
3	Mitigation	The Project site boundary encompasses the widening of the M23 spur eastbound from two to three lanes and this falls in part within the administrative area of Tandridge. Concern is raised regarding this in terms of the potential for run-off from construction areas to soils and subsequent leaching into groundwater. The construction of the surface access works would also introduce additional surface runoff during their operational phase by introducing additional hardstanding.	The potential for contaminants to be mobilised during construction as a result of leaching into groundwater is assessed within Chapter 10 of the PEIR. Any impacts during construction and operation will be mitigated through implementation of a remediation strategy and through compliance with the Code of Construction Practice.	Paras 10.9.52 to 10.9.53 & Table 10.8.1 of ES Chapter 10: Geology and Ground Conditions (APP-035)  ES Appendix 5.3.2 Code of Construction Practice (APP-082)  Annex 1 Water Management Plan of ES Appendix 5.3.2 Code of Construction Practice (APP-083)
4	Mineral Resource	The airport is underlain by Weald Clay (as identified). Although there are significant amounts of clay in the county, and sufficient reserves in the existing brickworks, MRA should be undertaken to identify the presence of minerals, in line with guidance, to avoid needlessly sterilising minerals (not just clay). Opportunities should be undertaken to extract any viable minerals prior to development. Materials found may be useable as part of the construction activities.	Any potential mineral resources, including the Weald Clay, will be reviewed within the MRA to be undertaken as part of the project, with opportunities for reuse to be explored.	ES Appendix 10.9.2 Mineral Resource Assessment (APP-139)
5	Ground Investigation	It is disappointing that Ground Investigation surveys have not been completed already, and we would encourage that this work be completed at the earliest opportunity	The site has been the subject of numerous previous investigations, the results of which are summarised within Chapter 10 and accompanied Appendix (Preliminary Risk Assessment). Further ground investigation will be undertaken where risks cannot be demonstrated to be low and to inform detailed design.	Section 10.6 of ES Chapter 10: Geology and Ground Conditions (APP-035)  ES Appendix 10.9.1: Preliminary Risk Assessment (APP-138)
1	Ground Investigation	The report summaries appear to be made in broad accordance with the relevant British Standards. However further engagement between GAL and RBBC will be needed on the proposed works within the borough boundary. For future proposed site investigation works, it would be prudent to consult RBBC, particularly for any areas within our Borough Boundary.	RBBC will be consulted on each step of the ground related works from scope to verification. The next stage will comprise further ground investigation and assessment in specific areas to verify the levels of risk (i.e. where historical data cannot demonstrate the risk in relation to contamination is low). Following this, where the ground investigation data identifies remediation is required, to ensure the site is suitable for its proposed use, a remediation strategy will be prepared.	Section 10.3 of ES Chapter 10: Geology and Ground Conditions (APP-035)
2	Ground Investigation	Little evidence in the PEIR has been submitted regarding the impact on the geology beneath Museum Field and land stability following the re-profiling of the land to form the flood compensation scheme.	Museum Field is indicated to be underlain by the Weald Clay. A mineral resource assessment (MRA) is to be undertaken as part of the project (planned as part of the ES submission), with opportunities for reuse to be explored. Adopted mitigation also incorporates implementation of further ground investigation with slope stability assessments to be undertaken for slopes forming part of the project detailed design.	ES Appendix 10.9.2 Mineral Resource Assessment (APP-139)  Table 10.8.1 of ES Chapter 10: Geology and Ground Conditions (APP-035)  ES Appendix 10.9.1: Preliminary Risk Assessment (APP-138).

3	Ground Water	The study area comprises the Project site boundary plus a 500m buffer. The Project site boundary encompasses the widening of the M23 spur eastbound from two to three lanes and this falls in part within the administrative area of Tandridge. Concern is raised regarding this in terms of the potential for run-off from construction areas to soils and subsequent leaching into groundwater. The construction of the surface access works would also introduce additional surface runoff during their operational phase by introducing additional hardstanding.	The potential for contaminants to be mobilised during construction as a result of leaching into groundwater is assessed within Chapter 10 of the PEIR. Any impacts during construction and operation will be mitigated through implementation of a remediation strategy and Code of Construction Practice.	Paras 10.9.52 to 10.9.53 & Table 10.8.1 of ES Chapter 10: Geology and Ground Conditions (APP-035)  ES Appendix 5.3.2 Code of Construction Practice (APP-082)  Annex 1 Water Management Plan of ES Appendix 5.3.2 Code of Construction Practice (APP-083)
4	Mineral Resource	The airport is underlain by Weald Clay (as identified). Although there are significant amounts of clay in the county, and sufficient reserves in the existing brickworks, MRA should be undertaken to identify the presence of minerals, in line with guidance, to avoid needlessly sterilising minerals (not just clay).	Any potential mineral resources along with the Weald Clay will be reviewed within the MRA to be undertaken as part of the project, with opportunities for reuse to be explored. Review of BGS records and previous ground investigation data suggests limited volumes of superficial deposits are present beneath the site. Where present, their resource	ES Appendix 10.9.2 Mineral Resource Assessment (APP-139)
5	Ground Investigation	It is disappointing that Ground Investigation surveys have not been completed already, and we would encourage that this work be completed at the earliest opportunity.	The site has been the subject of numerous previous investigations, the results of which are summarised within Chapter 10 and accompanied Appendix (Preliminary Risk Assessment). As stated, further ground investigation will be undertaken where risks cannot be demonstrated to be low. Ongoing ground investigation forming part of the highways element of the scheme will further enable development of the Conceptual Site Model informing risk verification / refinement.	Section 10.6 of ES Chapter 10: Geology and Ground Conditions (APP-035)  ES Appendix 10.9.1: Preliminary Risk Assessment (APP-138)

Ref	Subject	Description	GAL Response provided in August 2022	Signposting to DCO application
1	Soil Surveys	We note that soil surveys have been undertaken but request that the methodology is shared	The methodology is provided in Section 18.4.11 of the PEIR and includes a standard method for ALC survey work with hand auger borings located at a density of 1/ha.	Section 19.4 of ES Chapter 19 Agricultural Land Use and Recreation (APP-044)
2	Soil Surveys	There will be significant soil loss across the site, and it is noted that a soil management strategy will be implemented. However, there are no details to review at this stage which will be needed to inform future assessment work	The soil management strategy will be developed alongside the Project design and construction methodology and in accordance with recognised best practice measures. (See PEIR 18.4.1; 18.8.1)	ES Appendix 5.3.2 Code of Construction Practice Annex 4 Soil Management Strategy (APP-086)
3	Soil Strategy	WSSC wants to see the addition of the following guidance: The Government's Safeguarding our Soils strategy (2009b), and is supported by the Defra Construction Code of Practice on the Sustainable Use of soils on Construction Sites (Defra, 2009a)	Reference to these documents to be included within the chapter and any relevant sections/policies highlighted. The DEFRA best practice document for the Sustainable use of Soils on Construction Sites is referenced in the PEIR.	Paragraph 19.4.1 of ES Chapter 19 Agricultural Land Use and Recreation (APP-044)  ES Appendix 5.3.2 Code of Construction Practice Annex 4 Soil Management Strategy (APP-086)
4	Soil Strategy	A key concern is the temporary use of Holding 3 north of the South Terminal Roundabout. Whilst it does not merit a high agricultural score it helps maintain the Gatwick Setting and should be returned to its current use once the site is closed. However, the highway flood alleviation pond will reduce the amount of land available to return to current use. It is unclear if the pond has been taken into consideration. Clarity is sought. We would also require that the land is returned to its current use which maybe 15 years from start of the project."	The restoration of the land temporarily used within this holding would be included as part of the soil management strategy for the Project which will be developed alongside the Project design and included as part of the ES.	Para 19.9.12 of ES Chapter 19 Agricultural Land Use and Recreation (APP-044)  ES Appendix 5.3.2 Code of Construction Practice Annex 4 Soil Management Strategy (APP-086)
5	PRoW	It would be beneficial to have a PRoW strategy document to show how any construction impacts are dealt with appropriately and show how impacts on the public users will be kept to a minimum	A PRoW outline strategy document will be provided as part of the ES.	ES Appendix 19.8.1 Public Rights of Way Management Strategy (APP-215)
6	PRoW	In addition to the comments provided above with reference to Public Rights of Way and similar concerns on the implications for NCR21, there is potential to enhance the quality of the route and cycling around the airport. Reigate and Banstead along with Surrey County Council are about to endorse a Local Cycling and Walking Infrastructure Plan for the Borough with the intention of encouraging more cycling and walking. Chapter 18 of the PEIR contains very little on enhancing the local cycle network for recreational use and potentially the introduction of a segregated route along the A23 as part of the surface access improvements and introduction of mini-Holland style roundabouts at the South and North Terminal Junctions, along with joining up to cycle routes through the proposed Horley Business Park towards Horley Town centre could boost cycling in the vicinity of the airport, support active travel and reduce car use. The local authorities would be willing to discuss such measures."	The potential effects on and enhancement of the NCR21 need to be considered in the light of emerging highway design and local authority initiatives.	ES Appendix 19.8.1 Public Rights of Way Management Strategy (APP-215)  Section 19.8 and Paragraphs 19.9.18 to Paragraph 19.9.32 of ES Chapter 19 Agricultural Land Use and Recreation (APP-044)
7	PRoW	WSSC would expect to see improvements to the local PRoW network as part of these proposals. Particular opportunities include improvement and also possible upgrade of the Sussex Border Path, potentially to Bridleway, offering opportunities to cyclists and walkers particularly, which could tie into the road improvements proposed that would improve sustainable transport options for local residents, employees and leisure users. These opportunities may also be possible east of the South Terminal so as to offer sustainable transport options from the airport to Tinsley Green	This request is noted and will be taken into account in the development of the mitigation measures to be included in the project with reference to PRoW.	Para 4.4.7 of ES Appendix 19.8.1 Public Rights of Way Management Strategy (APP-215)  Section 19.8 and Paragraphs 19.9.18 to Paragraph 19.9.32 of ES Chapter 19 Agricultural Land Use and Recreation (APP-044)
8	PRoW	We note in particular that Public Footpaths 367, 367Sy and 368 will be disrupted during the initial construction phase of the proposed surface access works with Footpath 367Sy having to be diverted in the vicinity of the proposed Construction Compound to the north of the South Terminal Roundabout. Further details are needed including the proposed route changes, when they would take place, for how long, statutory notification procedures that would be undertaken, the type of surfaces being proposed, the proposed widths of the altered footpaths, the type of fencing proposed and the safety lines of site.	Detailed impacts on Public Footpaths 367, 367Sy and 368 during construction requested which would normally be provided during the detailed design stage.	Table 4.4.1 of ES Appendix 19.8.1 Public Rights of Way Management Strategy (APP-215)

9	Active Travel	WSSCC wants to see the addition of the following guidance: West Sussex Transport Plan (2011-2026); draft West Sussex Transport Plan (2022-2036); West Sussex Walking and Cycling Strategy (2016-2026); West Sussex Rights of Way Management Plan (2018-2028); Environmental Impact Assessment: Appraising Access (2020) – The Institute of Public Rights of Way & Access Management (IPROW)	Reference to these documents to be included within the chapter and any relevant sections/policies highlighted	Table 19.2.2 of ES Chapter 19 Agricultural Land Use and Recreation (APP-044)
10	PRoW	In relation to NCR21, there is potential to enhance the quality of the route and cycling to and around the airport which GAL should consider as part of the NRP to assist in terms of recreation and to in order to achieve the sustainable transport goals. No reference is made to Crawley's LCWIP, which details significant improvements needed to the key cycle and walking route to Gatwick along the alignment of NCR21. GAL should commit to delivering quality improvements to the latest standards LTN 1/20.	The potential to enhance the quality of NCR21 and walking/cycling to meet sustainable transport goals to be revisited. Reference to Crawley's LCWIP and the latest standards LTN 1/20 to be included in this topic chapter.	Design Principle DLP12 of Design and Access Statement - Volume 5 (APP-257)  Section 19.8 of ES Chapter 19 Agricultural Land Use and Recreation (APP-044)
11	Public Open Space	Riverside Gardens is a protected open space. We note that there is a proposal to include a pedestrian link between the footway on the northern side of the A23 near the Longbridge Roundabout into Riverside Gardens and another to the east but that the details remain patchy at present and would need further consideration. It appears in Chapter 18 that the surface access works to the M23 spur/A23 would require 0.75 hectares of land being removed permanently from Riverside Gardens. Unfortunately, the details of what land would be needed is not clear from the information provided in Chapter 18 or the associated appendices. This makes the assessment of the PEIR very challenging on this matter. Furthermore, it appears that the trees/ vegetation barrier between Riverside Gardens and the A23 would be significantly reduced which would significantly undermine the relative tranquillity of Riverside Gardens and its future attractiveness to users. This does not seem to have been fully addressed in Chapter 18.	The current design development of the highways scheme indicates that the permanent loss of POS within Riverside Garden Park will be approximately 0.8ha of land and within Church Meadow approximately 0.1ha of land would be affected for the provision of highways attenuation. Further information will be provided on areas of lost POS and provision of new links within the ES to reflect the further development of the highways design.	Table 19.7.1 of ES Chapter 19 Agricultural Land Use and Recreation (APP-044)

Ref	Subject	Description	GAL Response provided in August 2022	Signposting to DCO application
1	Archeological Assessment		Gatwick will provide the pre-application archaeological assessment report to the Principal Local Authorities having oversight of Heritage Issues. On basis of the assessment, it is anticipated there will be no requirement for post application archaeological assessment at Bayhorne and Gatwick Dairy Farm sites (SCC). There will be a requirement for further archaeological assessment in the eastern part of the Museum Field site (WSSC).	Para 7.9.52 onwards of ES Chapter 7 : Historic Environment (APP-032)
2	Archeological Assessment	-	Archaeological assessment within the airport boundary will be limited to where Predictive Modelling of Zones of Archaeological Potential indicates a high potential for surviving archaeological remains (see PEIR Figure 7.6.5).	ES Figure 7.6.5 Predictive modelling of zones of archaeological potential (APP-054)
3	Archeological Assessment	-	Assessment of air noise effects to historic buildings will follow the English Heritage Aviation Noise Metric. Research on the Potential Noise impacts on the Historic Environment by Proposals for Airport Expansion in England (Temple Group and Cotswold Archaeology, 2014; PEIR §7.4.6)	Section 7.4 and Section 7.9 of ES Chapter 7 : Historic Environment (APP-032)
4	Mitigation	Mitigation and enhancement measures should not just be limited to on site assets. Opportunities should be considered where the settings of heritage assets could be improved by physical works within the scheme boundary.	Further work on mitigation and enhancement is currently being undertaken as the scheme design progresses.	Section 7.8 of ES Chapter 7 : Historic Environment (APP-032)
5	Air noise on Listed Buildings	A full assessment of the impact of air noise on all listed buildings in the District should be undertaken.	The assessment of the impact of air noise change, with regard to designated heritage assets, including listed buildings, has been undertaken in line with the appropriate guidance.	ES Appendix 7.6.1: Historic Environment Baseline Report (APP-101)
6	Archeological Evaluation	Further archaeological evaluation is required - particularly within and around Museum Field but also on Pentagon Field and Crawler's Field	A phase of archaeological evaluation was undertaken last summer which included work within Museum Field and Pentagon Field. No part of the scheme is now proposed to be in Crawler's Field. A second phase of evaluation was carried out in May of this year at Bayhorne Farm and Gatwick Dairy Farm.	ES Appendix 7.6.1 Historic Environment Baseline Report (APP-101)

Ref	Subject	Description	GAL Response provided in August 2022	Signposting to DCO application
1	Ecology Assessment	The method for the assessment of effects on ecology receptors will follow the CIEEM Guidelines for Ecological Impact Assessment.		The methodology for the assessment of effects on ecology receptors follows CIEEM Guidelines as set out in Para 9.4.87 of ES Chapter 9: Ecology and Nature Conservation (APP-034)
2	Ecology Assessment	Baseline survey extent and project Zone of Influence to be discussed and agreed via the EWG		As set out in Para 9.4.17 of ES Chapter 9: Ecology and Nature Conservation (APP-034) the extent of survey work was agreed in consultation with Natural England.
3	Ecology Assessment	Scope of designated sites to be assessed will be as set out in the PEIR		<p>The scope of designated sites assessed is set out in paras 9.4.6 and 9.4.7 of ES Chapter 9: Ecology and Nature Conservation (APP-034).</p> <p>The initial search area for European designated sites (including SACs, SPAs and Ramsar sites) covered the area within 20 km of the Project site boundary. This buffer was extended for SACs designated for bats and for SACs/SPAs which are sensitive to changes in air quality from vehicle emissions and located within 200 m of major roads.</p> <p>An area within 5 km of the Project site was searched for other sites (SSSIs, National Nature Reserves (NNRs), Local Nature Reserves (LNRs) and locally-designated sites).</p>
4	BNG	There is no detail of any biodiversity enhancements from this Project. This should use Defra Metric v3.0 to ensure compensation is sufficient and that BNG can be delivered for this NSIP. The Environment Act 2021 places a 10% BNG requirement on development unless exempt which extends to nationally significant infrastructure projects which will become mandatory by autumn 2023. Opportunities to deliver enhancements need to be explored in consultation with appropriate stakeholders as a mechanism to deliver BNG.	BNG approach to be adopted to be determined as required by legislation at the time of submission.	ES Appendix 9.9.2: Biodiversity Net Gain Statement (APP-136)
5	Habitat Regulations	The HRA focuses on the effects of the NRP alone rather than in-combination. It is unclear what level of growth has been included within the in-combination assessment.	Section 5 of the HRAR includes an in-combination assessment, both screening and appropriate assessment. Several comments that the HRAR was hard to find. Can you explain how we can improve signposting to this within the ES? Other comments in relation to inclusion of ammonia in assessment. We will discuss this work with you in the course of the TWG sessions, and Ammonia will be included in the final ES.	Para 2.2.6 and Section 5 of ES Appendix 9.9.1 Habitat Regulations Assessment Part 1 and Part 2 (APP-134 & APP-135)
6	Mitigation/Long-term Management	WCC would expect the ES to include a long-term site/habitat management plan covering all the existing and proposed areas of biodiversity interest.	Mitigation and management plan to be submitted with ES. Will be long term and include details of monitoring to be undertaken. Mitigation areas are a considerable size and several are outside of the airport's boundary.	ES Appendix 8.8.1 Outline Landscape and Ecology Management Plan (APP-113, APP-114, APP-115 & APP-116)
7	Consultation	HDC welcome the opportunity for a Project biodiversity topic group to work closely with any landscape and other topic groups to ensure that environmental impacts during construction will be minimised and that compensatory measures are developed in an integrated manner to deliver multiple benefits.	GAL will set up a Biodiversity Engagement Group. Terms of reference to be decided but will include discussions on the approach to mitigation, enhancement and BNG.	Section 9.3 of ES Chapter 9 Ecology and Nature Conservation (APP-034)

8	Survey Extent	<p>If there is any risk of impacts (such air quality, river quality, and noise) extending beyond the site boundary, a broader survey area will be required, which should be based on the Zone of Influence. Surveys of protected species, such as Great Crested Newt and Water Vole, should also extend beyond the project site boundary. Apart from bat surveys, no further justification for survey areas has been given.</p>	<p>The survey area chosen is based on the potential for effects to receptors, and does include land outside of the area to be impacted. For example, surveys of ponds for GCN, were undertaken where there was habitat connectivity to suitable terrestrial habitat. Where the project has evolved, further surveys will be undertaken.</p>	<p>Para 9.4.9 of ES Chapter 9 Ecology and Nature Conservation (APP-034)</p>
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Ref	Subject	Description	GAL Response provided in August 2022	Signposting to DCO application
1	Viewpoints	Locations from which there is no existing view of infrastructure at Gatwick and it is highly unlikely that there would be a discernible view of proposed development; VP 10: Smallfield; VP 15: FP340 north-east of Charlwood; VP 18: Ifield; VP 19: High Weald AONB.	Assessment of these locations is not included in the ES.	N/A
2	Viewpoints	Locations from which there is a barely discernible element of existing infrastructure at Gatwick and any increase in development is likely to be barely discernible and have no more than a negligible impact on views; VP 1: Sussex Border Path (FP368) M23 junc. 9; VP 9: Fernhill (FP367); VP 13: Hookwood (FP342); VP 14: FP339 north of Hookwood.	Assessment of these locations is not included in the ES	N/A
3	Viewpoints	Locations from which existing infrastructure at Gatwick is visible and new development will be visible; VP 2: Sussex Border Path (FP362a) Footbridge rail crossing; VP 3: North Terminal Roundabout; VP 4: Sussex Border Path, A23; VP 5: Longbridge Roundabout; VP 6: Lowfield Heath Road; VP 7: Bonnetts Lane VP 8: Poles Lane, bridleway; VP 11: East of Salfords PRoW; VP 16: FP 325 west of Gatwick; VP 17: Russ Hill PRoW.	Preparation of a photomontage to inform an assessment of potential effects in the ES	ES Chapter 8 Landscape, Townscape and Visual Resources (APP-033)  ES Chapter 8 Landscape, Townscape and Visual Resources Figures- Part 1, Part 2, and Part 3 (APP-060, APP-061 & APP-062)
4	Viewpoints	The number of LVIA viewpoint locations seems on the low side for the scale and physical extent of development proposed. Taller elements of proposed infrastructure, in particular the CARE facility (but also new decked car parks, hotels and contractor compounds), are likely to be visible from a number of locations within the Surrey part of the study area. We recommend reviewing the scope for additional viewpoints within Surrey that fall within the Zone of Theoretical Visibility (ZTV).	Field survey work has been undertaken to verify the potential for visibility within areas of the ZTV. Not every receptor will be represented by a viewpoint/photograph. Viewpoints have been chosen to ensure a broad coverage of the study area is obtained and all likely significant visual effects are assessed. Consultation and field surveys will continue throughout the preparation of the ES to identify further potential viewpoints.	Paragraphs 8.4.5-8.4.7 of ES Chapter 8 Landscape, Townscape and Visual Resources (APP-033)
5	Tranquility Impact Assess.	The methodology in Appendix 8.4.1 describes the process of obtaining baseline information relating to tranquillity, but does not provide criteria for magnitude of change or a description of the significance levels applied to judgements made in the LTVIA. We advise that this information should be added to the methodology to respond to statutory consultee concerns regarding the tranquillity methodology and to provide justification for identified effects.	The PEIR considers effects on the perception of tranquillity based on the overall methodology for landscape, townscape and visual effects. A separate section of the methodology will be developed and applied within the LTVIA of the ES to address specific tranquillity issues.	Para 8.4.16 onwards of ES Chapter 8 Landscape, Townscape and Visual Resources (APP-033)
6	High Weald AONB	The characteristics of 'High Weald' and 'High Weald Forests' which are partially within the High Weald AONB are briefly described. The assessment focuses on effects on district scale landscape character areas which are shown on Figure 8.6.2. However the baseline character of relevant character areas within the High Weald AONB is not described and they are not assessed in later sections of the LTVIA. This should be explained.	The LTVIA within the PEIR describes the special qualities and other qualities of the High Weald AONB at 8.6.16 to 8.6.22 and the objectives relevant to the designation. This forms the basis for the LTVIA. The Mid Sussex Landscape Character Assessment can also be referred to which covers the same area within the study area and describes very similar characteristics. This can support the LTVIA for the ES, although should avoid double counting of the same effects on the same area of landscape described in two different documents.	Para 8.9.60 of ES Chapter 8 Landscape, Townscape and Visual Resources (APP-033)
7	Landscape Mitigation	The aspiration of the NRP should be to improve landscape and visual impact of airport; it is considered that the current approach is not ambitious and seems to rely on tree planting to eventually screen the works. The design and layout need to be reconsidered to look at options to reduce the visual damage on nearby areas.	Design development for proposed buildings and infrastructure will continue and will inform the LTVIA for the ES. Landscape mitigation proposals will form an important element within the Project. Landscape mitigation proposals will be developed to minimise and mitigate adverse effects of the Project. The Project design will seek to provide replacement landscape for any that is lost as a result of development.	Section 8.8 of ES Chapter 8: Landscape, Townscape and Visual Resources (APP-033)
8	Illustrative Material	There is a general lack of visual supporting information at this stage (e.g. elevational and axonometric drawings, wirelines and photomontages) for proposed buildings, infrastructure, highway works, vegetation removals, new planting and cumulative effects from nearby consented/proposed developments which makes it more difficult to assess the likely impacts of the project. We seek confirmation that photomontage (type 3/4) visualisations will be produced for the finalised LVIA.	The PEIR incorporates appropriate photomontages of most representative viewpoint locations. All viewpoint locations will be developed as Type 3 or 4 photomontages for the ES based on Landscape Institute guidelines. Design development to inform environmental impact, LTVIA and mitigation/enhancement strategy.	ES Chapter 8 Landscape, Townscape and Visual Resources Figures- Part 1, 2 and 3 (APP-060, APP-061 & APP-062)

Ref	Subject	Description	GAL Response provided in August 2022	Signposting to DCO application
1	Water Quality	Provision of details of the future de-icing strategy	Greater detail to be provided as part of the ES	ES Appendix 11.9.4: Water Quality De-icer Impact Assessment (APP-145)
2	Water Quality	Methods for cleaning surface water before being released into the wider environment lacks detail with references to best practice	Additional information will be provided in the ES. Potentially contaminated runoff will be treated prior to discharge offsite following CIRIA best practice	Table 11.8.1 of ES Chapter 11: Water Environment (APP-036)
3	Hydrogeology	Impact on groundwater movements	Assessment methodology included in the PEIR water environment chapter. ES assessment will be informed by a ground investigation currently being progressed	Appendix 11.9.5: Groundwater Assessment (APP-146) Paragraphs 11.9.30-11.9.34 of ES Chapter 11 Water Environment (APP-036)
4	Flood Risk	Impact on hydrology of land raising at pentagon field	The deposition of spoil will not alter the existing runoff hydrology	Para 11.7.11 of ES Chapter 11: Water Environment (APP-036)
5	Flood Risk	Increase in impermeable area	The NRP includes additional attenuation storage within the drainage network to ensure no increase in offsite flood risk as demonstrated in the PEIR	ES Appendix 11.9.6: Flood Risk Assessment (APP-147).
6	Flood Risk	Further attempts should be made to de-risk the essential infrastructure in the submitted version of the DCO application. At present it doesn't seem to go far enough.	GAL is developing a Flood Threat Plan as referenced in the PEIR that ensures the safety of passengers and operatives during a flood event	Annex 6 Flood Resilience Statement to ES Appendix 11.9.6 Flood Risk Assessment (APP-147)
7	Flood Risk	Clarity is needed as to how this water (draining towards the northern boundary) would be collected and the rate it would be released to the Gatwick Stream	As stated in the PEIR runoff will continue to drain to existing ponds augmented by additional below-ground attenuation storage across the airfield to ensure no increase to flood risk.	Para 5.3.1 of ES Appendix 11.9.6: Flood Risk Assessment (APP-147)
8	Flood Risk	Although the hydrology model has taken into account the Upper Mole Flood Alleviation Scheme, this only takes account of 1 in 100 year events and is likely to be overwhelmed when summer 2021 European type events repeat themselves in the coming years	The surface water drainage and fluvial mitigation strategies both include allowances for the predicted impact of climate change as required by the NPS and NPPF based on CP09 and CP18 respectively as translated into guidance by the Environment Agency.	Para 3.7.4 of ES Appendix 11.9.6: Flood Risk Assessment (APP-147)
9	Flood Risk	In the event of extreme flooding events how would the airport, road and rail infrastructure be able to cope with a flooded site	GAL is developing a Flood Threat Plan as referenced in the PEIR that ensures the safety of passengers and operatives during a flood event	Annex 6 Flood Resilience Statement to ES Appendix 11.9.6 Flood Risk Assessment (APP-147)
10	Flood Risk	How much additional capacity is actually being provided within the perimeter, how much additional capacity is being provided outside the airport perimeter but within the project redline	Museum Field FCA = 30,000m <sup>3</sup> ; Car park X FCA = 55,000m <sup>3</sup> ; Car Park Y tank = up to 30,000m <sup>3</sup> ; Airfield drainage tanks = 8,500m <sup>3</sup>	Flood compensation areas are set out in Table 7.2.1 of ES Appendix 11.9.6: Flood Risk Assessment (APP-147)  Paras 7.3.3 onwards sets out additional storage at Car Park Y and airfield.
11	Flood Risk	Currently the level of information on discharge rates and where the water will go from the Highway Drainage strategy appears limited. Further information is requested especially should greenfield rates not be achievable	The surface water drainage strategy for the highways improvements as part of the NRP are being developed further to inform the ES. The updated FRA that will support the ES will include additional detail on the surface water drainage strategy	Annex 2 Surface Access Highways Surface Water Drainage Strategy Summary of ES Appendix 11.9.6: Flood Risk Assessment (APP-147)
12	Flood Risk	The proposed works will increase the flood risk particularly along the Gatwick stream and River Mole until the mitigation measures are in place which appear in the case of the Gatwick Stream in Riverside Gardens Park – very late in the project timescales	The proposed scheme will not increase flood risk off-site as demonstrated in the FRA. The floodplain compensation areas proposed as mitigation for loss of floodplain will be constructed before any loss of respective floodplain due to the proposed scheme	Para 7.2.5 of ES Appendix 11.9.6: Flood Risk Assessment (APP-147)
13	Flood Risk	Major road works and flood alleviation measures should be completed before the runway is fully operational	The floodplain compensation areas will be constructed before any loss of respective floodplain due to the proposed scheme	Para 7.2.5 of ES Appendix 11.9.6: Flood Risk Assessment (APP-147)
14	Wastewater	The NRP should be carefully planned to ensure that it does not prejudice the expansion of Crawley WwTW	Discussions with Thames Water are ongoing. No impediment has been raised by TW to date	Para 5.3.2 of ES Appendix 11.9.6: Flood Risk Assessment (APP-147)
15	Wastewater	There is a potential impact on the wastewater system arising from increased flows in the network exceeding the available capacity	Hydraulic modelling demonstrates that the proposed infrastructure is of sufficient capacity for the projected flows	Section 8 of ES Appendix 11.9.7 Wastewater Assessment (APP-150)
16	Wastewater	Which areas of the wastewater network would need to be improved without a new pumping station east of the Brighton-London mainline and when would the new pumping station be needed	The assessment of effects on the Thames Water network and wastewater treatment works is ongoing and will be updated in the ES. The pumping station east of the Brighton-London mainline is dependant on ongoing discussions with Thames Water and the impact of the NRP on Crawley and Horley WwTW	Para 8.1.2 of ES Appendix 11.9.7 Wastewater Assessment (APP-150)
17	Water Supply	More ambitious water efficiency measures, including retrofitting of existing buildings are required	The PEIR demonstrates that the additional requirements for water usage can be met by SESW	Para 11.4.11 of ES Chapter 11 Water Environment (APP-036)
18	Water Supply	The Water Supply Assessment does not extend to the full operational water need in 2047 when a potential 80.2 million passengers	The assessment will be updated to inform the ES and assess to the year 2047	Section 4 of ES Appendix 11.9.8 Water Supply Assessment (APP-151)

19	Water Supply	What effect the recent position statement from Natural England, requiring planning permission applications in the majority of Crawley and north West Sussex to demonstrate that they do not increase pressure on water resources	Initial conversations were carried out with SESW to confirm availability for any water supply, this will continue to be evaluated and discussed in the ES, and any new statements/policies will be taken into account.	Section 4 of ES Appendix 11.9.8 Water Supply Assessment (APP-151)
20	Water (All)	When will a maintenance programme of the water infrastructure be made available along with effective monitoring reporting	Initial assessment of maintenance requirements will be included with ES.	Table 11.8.1 of ES Chapter 11: Water Environment (APP-036)
21	Water Quality	It is not clear how the impacts of the proposed development on the water quality of the River Mole will be mitigated. Within the PEIR it states that the future de-icing strategy (for increased air traffic movements) has not been developed at this stage. It is therefore difficult to understand how the PEIR concludes that any impact on water quality would be negligible.	The ES and supporting water quality impact assessment will provide additional information. Mitigation measures will be incorporated into the scheme to ensure no deterioration in existing water quality. We will share more detailed methodology and findings in a later TWG.	ES Appendix 11.9.4 Water Quality De-Icer Impact Assessment (APP-145)
22	Groundwater	It is not clear from the PEIR and its appendices, if alterations to the land surface heights proposed by the DCO and the changes these would have to groundwater movements have been fully integrated into the hydrology model. Similarly has the land raising at Pentagon Field, where large volumes of spoil is going to be deposited, been taken into account at the different stages in the project?	The water environment and geology and soils chapters of the PEIR consider these changes on groundwater. Existing catchment boundaries in Pentagon Field will not be changed due to the deposition of spoil. A ground investigation is being progressed that will inform an update to the groundwater impacts assessment which will be included in the subsequent ES.	Para 11.7.11 of ES Chapter 11 Water Environment (APP-036)
23	Flood Risk	Whilst chapter 11 and associated appendices appear very confident in coping and mitigating for flooding, there have been serious historic flooding incidents at the airport. From the written text provided it is unclear at what point the flood alleviation ponds could overflow, i.e. their capacity, and under what circumstances. Sharing different scenarios and outputs in the main document would be helpful as at present it is difficult to assess. A related concern is the adequacy of the capacity of the proposed and remaining existing flood alleviation measures to absorb more surface water as a result of more hard landscaping. It is not clear whether this will result in faster flows to the local fluvial network including the River Mole and Gatwick Stream at times when they would already be at capacity or in a state of flood. It is not very clear in the evidence provided the wider effects of the hard surfacing on the fluvial network. It is considered that further attempts should be made to de-risk the essential infrastructure in the submitted version of the DCO application. At present it doesn't seem to go far enough.	The Flood Risk Assessment (FRA) Appendix to the PEIR demonstrates that there will be no increased risk of flooding off site as a result of the NRP. Any residual flood risk on-site will be safely managed via the Flood Threat Plan developed by GAL as it is now.	Section 6.2 of ES Appendix 11.9.6: Flood Risk Assessment (APP-147)  Annex 6 Flood Resilience Statement to ES Appendix 11.9.6 Flood Risk Assessment (APP-147)
24	Flood Risk	The second pond option adjacent to Longbridge Roundabout is further north in Church Meadows. This is in an Area of High Archaeological Potential. The site is currently open and there are likely to be impacts on local ecology. Should both proposed locations be found inappropriate, it is unclear what further options could be brought forward and how they would be scrutinized as part of the DCO process prior to submission to the Planning Inspectorate. At present two options are being proposed for Longbridge Roundabout. We are aware that more southerly site is already very waterlogged for much of the year and question whether this would be appropriate for a pond that was meant to be alleviating flooding.	The location of the highways attenuation ponds has been informed by the fluvial flood risk modelling for the project and consequently they have been located outside the floodplain. The pond options are not in the AHAP. The ponds and associated landscaping would be designed to mitigate any ecological effects, and result in enhancement.	ES Figure 11.6.1 General Water Features (APP-057)
25	Flood Risk	PEIR Figure 11 includes a new flood compensation area below Car Park X in the north of the site. Reviewing the drainage areas contained in Figure 11.6.7 it appears that more water would be draining to the northern boundary of the site rather than being held locally as a result of significant new development/ infilling between the North and South Terminals. Clarity is needed as to how this water would be collected and the rate it would be released to the Gatwick Stream.	The NRP does not change the overall surface water drainage strategy for the airfield; there will be no new outfalls to receiving watercourses or increase to peak discharge rates. Runoff will continue to drain to existing ponds augmented by additional below-ground attenuation storage across the airfield to ensure no increase to flood risk.	Para 5.3.1 of ES Appendix 11.9.6: Flood Risk Assessment (APP-147)
26	Flood Risk	Environment Agency data plus a modest 1% buffer i.e. takes account of 1 in 100 year events. However, it is not clear how more significant flooding events such as those seen in Europe in summer 2021 are being taken account in the Gatwick hydrology model. At present there seems to be significant reliance on depositing water in the neighbouring rivers and streams rather than providing additional capacity within the site. Although the hydrology model has taken into account the Upper Mole Flood Alleviation Scheme, this only takes account of 1 in 100 year events and is likely to be overwhelmed when summer 2021 European type events repeat themselves in the coming years.	The surface water drainage and fluvial mitigation strategies both include allowances for the predicted impact of climate change as required by the NPS and NPPF based on CP09 and CP18 respectively as translated into guidance by the Environment Agency. The FRA demonstrates that through the provision of additional attenuation storage and floodplain compensatory storage the NRP will not increase flood risk for its lifetime taking climate change into account.	Para 3.7.4 of ES Appendix 11.9.6: Flood Risk Assessment (APP-147)
27	Flood Risk	In the event of extreme flooding events how would the airport, road and rail infrastructure be able to cope with a flooded site – what evacuation routes would remain open and would they be accessible to those from across the site as well as those using the public road network?	Gatwick is developing a Flood Threat Plan that will demonstrate how the airport will respond to such an event and will be finalised to inform the ES.	Annex 6 Flood Resilience Statement to ES Appendix 11.9.6 Flood Risk Assessment (APP-147)
28	Flood Risk	We would like to know in terms of water storage within the airport perimeter including existing open spaces how much additional capacity is actually being provided within the perimeter, how much additional capacity is being provided outside the airport perimeter but within the project redline. How will this effect overall discharge rates off the site compared with the current rate of groundwater discharge	The NRP design includes mitigation through storage to ensure no increase in the peak rate of runoff off site. The NRP will include at least 18,500m <sup>3</sup> of additional storage to store the runoff from the increase in airfield impermeable area. The NRP design also incorporates additional fluvial water storage via floodplain compensation areas. The NRP will also provide 85,000m <sup>3</sup> of additional floodplain to ensure no increase in fluvial flood risk from rivers.	Section 7.2 of ES Appendix 11.9.6 Flood Risk Assessment (APP-147)

29	Flood Risk	There are several significant alterations and road widenings proposed to the Highway network. The proposed surface access improvements drainage strategy mentions the installation of a drainage network consisting of carrier drains, filter drains, ditches and attenuation ponds, along with flow control arrangements to limit discharges to watercourses. Currently the level of information on discharge rates and where the water will go from the Highway Drainage strategy appears limited. Further information is requested especially should greenfield rates not be achievable, these would include the impacts on the surrounding areas and mitigation measures proposed especially south Horley and the proposed Strategic Business Park.	The surface water drainage strategy for the highways improvements as part of the NRP are being developed further to inform the ES. The updated FRA that will support the ES will include additional detail on the surface water drainage strategy. We will be able to share the Highways Drainage Strategy with LA's later in 2022.	Annex 2 Surface Access Highways Surface Water Drainage Strategy Summary of ES Appendix 11.9.6: Flood Risk Assessment (APP-148)
30	Flood Risk	The proposed works will increase the flood risk particularly along the Gatwick stream and River Mole until the mitigation measures are in place which appear in the case of the Gatwick Stream in Riverside Gardens Park – very late in the project timescales.	The proposed scheme will not increase flood risk as demonstrated in the FRA. The floodplain compensation areas proposed as mitigation for loss of floodplain will be constructed before any loss of respective floodplain due to the proposed scheme	Para 7.2.5 of ES Appendix 11.9.6: Flood Risk Assessment (APP-147)
31	Flood Risk	Major road works and flood alleviation measures should be completed before the runway is fully operational.	The floodplain compensation areas proposed as mitigation for loss of floodplain will be constructed before any loss of respective floodplain due to the proposed scheme	Para 7.2.5 of ES Appendix 11.9.6: Flood Risk Assessment (APP-147)
32	Wastewater	The NRP should be carefully planned to ensure that it does not prejudice the expansion of Crawley WwTW, should this be required at any point in the future to serve development needs. Should Thames Water require additional capacity to serve the Project, full details should be provided and consulted upon.	Discussions with Thames Water have been ongoing throughout the development of the PEIR and continue with regard to the impact of the proposed scheme on Crawley WwTW	Para 8.1.2 of ES Appendix 11.9.7 Wastewater Assessment (APP-150)
33	Wastewater	We note that there is a potential impact on the wastewater system arising from increased flows in the network exceeding the available capacity which could disrupt airport operations, particularly in and around the terminal buildings. We also understand that there are network capacity limits feeding to the Horley Sewerage Treatment Works which is being placed under greater pressure through the scale of new development taking place north of Horley and the proposed business park. At present it appears in the PEIR that further support is needed from Thames Water for this to be progressed though it will be critical in handling additional material generated by the increased scale of airport operations. It is unfortunate that this still needs to be confirmed by Thames Water. The question is which areas of the wastewater network would need to be improved without a new pumping station east of the Brighton-London mainline and when would the new pumping station be needed?	Section 11.9: Hydraulic modelling has been undertaken to determine the impact of the additional flows in the GAL wastewater network infrastructure. The modelling results show that the proposed infrastructure is of sufficient capacity for the projected flows, so it is considered that the impact is negligible, resulting in a negligible/minor adverse effect (not significant). The assessment of effects on the Thames Water network and wastewater treatment works is ongoing and will be updated in the ES. The pumping station east of the Brighton-London mainline is dependent on ongoing discussions with Thames Water and the impact of the NRP on Crawley and Horley WwTW.	Para 8.1.2 of ES Appendix 11.9.7 Wastewater Assessment (APP-150)
34	Water Supply	More ambitious water efficiency measures, including retrofitting of existing buildings are required. The project maximise the scope for water efficiency savings, given the serious water stress in the south east and current need for water neutrality in the Southern Water Sussex North supply area.	Gatwick is in the SES Water catchment area. Gatwick has a Decade of Change target to reduce potable water consumption per passenger by 50% irrespective of whether the Northern Runway Project proceeds or not. The PEIR demonstrates that the additional requirements for water usage can be met by existing infrastructure and GAL has confirmed this in consultation with SESW.	Section 4 of ES Appendix 11.9.8 Water Supply Assessment (APP-151)
35	Water Supply	At present methods for cleaning surface water before being released into the wider environment lacks detail with references to best practice. Clarity is needed in order to fully assess the proposed measures in order to ensure that contaminated water meets quality standards and that those standards are constantly monitored before release to the fluvial network and wider environment. In the event of water quality standards falling below agreed standards mitigation and clean up measures should be included in a legal document. This would be accordance with local SuDS advice.	Additional information will be provided in the ES. Potentially contaminated runoff will be treated prior to discharge into receiving watercourses.	ES Figure 11.8.1 Contaminated Water Path Project Route (APP-057)  Table 11.8.1 of ES Chapter 11 Water Environment (APP-036)
36	Water Supply	The Water Supply Assessment does not extend to the full operational water need in 2047 when a potential 80.2 million passengers (Stated in PEIR Chapter 5 para 5.4.5 and this should be taken into account compared with c.46 million passengers using the airport in 2019). It is also unclear how water efficiency savings will be implemented in time for the proposed opening of the Northern Runway and Pier 7. Other plans also suggest the opening of other hotels on the site and it is unclear how these have been factored into the calculation and whether similar low usage rates could be achieved.	Calculations will be refined as design progresses, both for forecast water demand and water efficiency measures. The ES will provide further clarity on both calculated water demands through progression of site development, and implementing of water efficiency measures to offset this increase	Paras 11.6.91, 11.6.136, 11.8.6 and 11.13.41 of ES Chapter 11 Water Environment (APP-036) Annex 4 of ES Appendix 11.9.8 Water Supply Assessment (APP-151)
37	Water Supply	We would also be interested to know what effect the recent position statement from Natural England, requiring planning permission applications in the majority of Crawley and north West Sussex to demonstrate that they do not increase pressure on water resources, might have on the above conclusion and how it may affect the projected labour supply in general as well as the proposed additional labour split by local authority	Gatwick is in the water supply area for SESW. Initial conversations were carried out with SESW to confirm availability for any water supply, this will continue to be evaluated and discussed in the ES, and any new statements/policies will be taken into account.	Section 4 of ES Appendix 11.9.8 Water Supply Assessment (APP-151)
38	Maintenance	At what point in the process will a maintenance programme of the water infrastructure be made available along with effective monitoring reporting.	Maintenance requirements will be addressed in the ES as appropriate to the infrastructure in question. Local Authority owned infrastructure will be the subject of discussion before the ES is written.	Table 11.8.1 of ES Chapter 11: Water Environment (APP-036)
39	Design Details	The council has reviewed the relevant chapters with regards to surface water flood risk and sustainable drainage. The proposals submitted so far are very high level, with no real detailed design included within the consultation documents. It is difficult to assess the impact of proposals as the level of detail is not sufficient to scrutinise and further information is requested.	The detailed design for the proposed scheme will not be developed until after the DCO application. Additional information will be included as part of the ES.	ES Chapter 11 Water Environment (APP-036)

Ref	Subject	Description	GAL Response provided in August 2022	Signposting to DCO application
1	Public Safety Zones	Details should be provided on how the current PSZ and new PSZ for the Northern runway relate to proposed land uses for the NRP	A standardized PSZ shape has replaced the previous risk-based model profile (see plan). The EIA will provide detail on the PSZ for the Northern Runway. Note that Pentagon Field is no longer proposed due to the removal of the car park previously proposed for this area.	Table 2.4.2 of ES Appendix 5.3.4 Major Accidents and Disasters (APP-089)
2	Local Road Network	What would the wider impacts be on the local road network should a major issue occur?	Traffic and Transport impacts have been addressed based on the approach and methodology set out in the Institute of Environmental Management and Assessment (IEMA) guidance (IEMA, 2004). It is customary to base traffic assessments on everyday conditions, so the consequential effects of failures of other transportation systems or nodes, or indeed industrial action are not typically evaluated. In the event of an incident, the Airport Operational Management Centre would advise on the response measures to be taken.	Table 2.4.3 of ES Appendix 5.3.4 Major Accidents and Disasters (APP-089) Paragraph 12.9.5 onwards ES Chapter 12 Traffic and Transport (APP-037)
3	Local Road Network	With regards Major Accidents and Disasters, GAL has proposed to scope out such issues and describes that there are extensive mitigation and contingency measures in place but they are confidential and cannot be detailed in the EIA.	The issue of confidentiality was raised in the Scoping Report which was issued to the Planning Inspectorate (PINS) in September 2019. The PEIR was subsequently prepared in line that opinion. Fresh consideration was given to specific events and scenarios which had previously been excluded, further information was provided on the systems currently in place at the airport to manage or mitigate potential effects, and addition assessments were made of comparative risks. The issue of confidentiality was not again raised.	Table 2.4.2 of ES Appendix 5.3.4 Major Accidents and Disasters (APP-089)
4	Local Emergency Response	Concern that NRP would result in fire stations close to the airport being called upon more frequently for Gatwick 'domestic' incidents. Therefore, clarity is required about whether Gatwick Fire and Rescue Service are still going to be operating a domestic appliance and if the category of the airport would remain the same.	Following the NRP, Gatwick Fire and Rescue Service will still operate a domestic appliance. The category of the airport will remain the same.	Table 2.4.3 of ES Appendix 5.3.4 Major Accidents and Disasters (APP-089)
5	Local Emergency Response	In the event of a major incident or disaster, there would be an increased demand for humanitarian support required, which would put higher demands and pressures on acute hospitals/local authorities and rest centre requirements. Currently, capacity is identified in local hotels to accommodate rest centres or reunion areas and further information is required about whether this would change (given the increase in passengers and higher demands for accommodation).	The demand for humanitarian support in response to a major incident or disaster would be dependent upon the nature of the specific event. The NRP will result in an increase in passenger numbers and total aircraft movements. However, it won't 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 centers.	Table 2.4.2 of ES Appendix 5.3.4 Major Accidents and Disasters (APP-089)
6	Local Emergency Response	WSSC Fire Service have asked that they be included in any future consultations or discussions in relation to mitigation works taking place that form part of the project in relation to wildfires and flooding. There are concerns from WSSC in relation to flood risk increasing through the increase of infrastructure. The River Mole, which runs through the airport, already poses a substantial risk when water levels are high or there is heavy rainfall.	WSSC Fire Service will be included in future consultations on mitigation works in relation to wildfires and flooding.	Table 2.4.3 of ES Appendix 5.3.4 Major Accidents and Disasters (APP-089)
7	Local Emergency Response	It is not clear if Surrey Fire & Rescue service been involved in the consultations. WSSC recommends that they are included going forward if not consulted to date.	Surrey Fire & Rescue service is a Statutory Consultee.	Table 2.4.3 of ES Appendix 5.3.4 Major Accidents and Disasters (APP-089)
8	Local Emergency Response	WSSC require clarity also on whether there is enough capacity at local A&E departments and within the broader emerging ICS (Integrated Care System) to cope with the demand of an additional 14 million passengers passing through the airport every year.	Residual impact on external healthcare providers is not solely a factor of passenger throughput, as the intervention, triage and care provided can significantly reduce the need for ambulance call outs and referral. A forecast of port health statistics has been provided and will be further explored at ES the stage. In terms of construction impacts, the proportion of non-home-based staff will not be significant, and an occupational health service provision will be in place to address the occupational health needs of the workforce, removing impacts upon local public health care capacity. This will be explored as part of the ES. Population growth and associated health care demand due to the economic prosperity that the northern runway will bring has not been considered. Residential developments that would directly cause any rapid increase in migration would be the target of proportionate planning contributions to address any gap in NHS budget allocations. This would be funded through Tax and National Insurance.	Table 2.4.3 of ES Appendix 5.3.4 Major Accidents and Disasters (APP-089)
9	GAL & Other Emergency Response	What are the emergency measures in place for aircraft when the emergency northern runway is 'not available as a standby runway for a period of several months'?	Should circumstances arise where an aircraft could not use the runway(s) at Gatwick, for whatever reason, it would be diverted to an alternative airport.	Table 2.4.3 of ES Appendix 5.3.4 Major Accidents and Disasters (APP-089)
10	GAL & Other Emergency Response	With the increase in the terminal forecourt areas and increased passenger numbers, there is concern this could increase the risk of potential terrorist activities taking place in these locations. WSSC recommend consultation with the National Counter Terrorism Security Office (NaCTSO) if this has not already been undertaken.	It is highlighted that GAL's engagement with NaCTSO is an on-going activity, and not one that occurs solely during airport development planning, although they are of course consulted on this issue. The risk of potential terrorist activities is not really a function of passenger numbers or forecourt development. The increased capacity associated with the Project would not therefore be expected to have a direct effect on this aspect.	Table 2.4.3 of ES Appendix 5.3.4 Major Accidents and Disasters (APP-089)
11	Sundry	Would the rendezvous points remain in their current locations or would these be relocated? This would impact emergency services and possibly the attending appliances if these were to be relocated.	The precise locations of rendezvous points will be determined at the Project's detailed design stage. The locations will be established with due consideration given to emergency response logistics.	Table 2.4.3 of ES Appendix 5.3.4 Major Accidents and Disasters (APP-089)
12	Sundry	Occupational hazards associated with earthworks, and airside construction activities generally	Will be further evaluated in the ES	Table 5.1.2 of ES Appendix 5.3.4 Major Accidents and Disasters (APP-089)

13	GAL & Other Emergency Response	Rail transportation accidents including collision with trains, trams or inter terminal rail during construction works. The assessment will consider the transportation by rail of construction materials and aggregates if this Project is taken forward	Will be further evaluated in the ES	Table 5.1.2 of ES Appendix 5.3.4 Major Accidents and Disasters (APP-089)
14	GAL & Other Emergency Response	Disruption to airport operations resulting from severance of utilities, including air safety and airside systems, during construction operations	Will be further evaluated in the ES	Table 5.1.2 of ES Appendix 5.3.4 Major Accidents and Disasters (APP-089)
15	Sundry	Potential for bird strike due to an increased risk of attracting birds from additional landscaping, water bodies and flat roof buildings	Will be further evaluated in the ES	Table 5.1.4 of ES Appendix 5.3.4 Major Accidents and Disasters (APP-089)

Ref	Subject	Description	GAL Response provided in August 2022	Signposting to DCO application
1	PEIR Assessment	Some gaps in assessments due to lack of information at PEIR stage	Conclusions are preliminary and will be built on at ES stage. The only significant effects identified by health and wellbeing were beneficial (for employment) (as presented at TWG 1).	N/A
2	Quantitative Assessment	Welcomes quantitative assessment of health effects associated with noise. Request more detail on the methods and data used.	Further detail on methods provided in the ES. Best practice methods, such as those of the Institute of Public Health (IPH) will be used. It is expected that new IEMA guidance on health in EIA will be available (which is very similar to the IPH approach).	Section 18.4 of ES Chapter 18: Health and Wellbeing (APP-043)
3	Incidence Rates	Request for inclusion of incidence rates within noise health analysis to provide an indication of risk magnitude.	Incidence rates to be included in the ES quantitative health analysis.	Section 18.8 of ES Chapter 18: Health and Wellbeing (APP-043) ES Appendix 18.8.1 Quantitative Health Assessment Results (APP-208)
4	Mental Health	Welcome approach to mental health and request for issues of risk perception to include means of communicating risk to the public.	Presentation of ES conclusions and use of non-technical summaries will support communicating issues of risk to the public.	EIA Non-Technical Summary (APP-217)
5	Vulnerable Groups	Request to further consider vulnerable groups, including potential for disproportionate effects separate sensitivity conclusions and targeted mitigation.	The ES coverage of vulnerable sub-populations will consider the potential for health inequalities and target mitigation accordingly. The approach will align to emerging IEMA guidance. This is expected to have separate sensitivity scores to reflect differences between the general population and vulnerable sub-populations.	Sections 18.4 and 18.8 of ES Chapter 18: Health and Wellbeing (APP-043) ES Appendix 18.5.1 Health Baseline Trends, Priorities and Vulnerable Groups (APP-206) ES Appendix 18.5.2 Health and Wellbeing Baseline Data Tables (APP-207)
6	Employment & Training Opportunities	Welcomes assessment of employment and training opportunities and requests targeted mitigation for disadvantaged groups.	Targeted mitigation, including through the Outline Employment Skills and Business Strategy is being considered.	Section 18.8 of ES Chapter 18: Health and Wellbeing (APP-043)
7	Health Service Implications	Notes further analysis of healthcare service implications of a non-home based construction workforce and Port Health statistical review	Information about the workforce will support routine service planning. Healthcare needs are being assessed and reported in the ES. Pre-COVID Port Health data is likely to be the most relevant.	Section 18.8 of ES Chapter 18: Health and Wellbeing (APP-043)
8	Health Baseline	Request for clarifications of the health baseline, including mental health indicators and physical activity indicators.	The health baseline will be used to evidence conclusions on the sensitivity of the population and relevant sub-populations. High sensitivity for sub-populations will be assumed, including linked to mental health.	Paras 18.5.6 onwards of ES Chapter 18: Health and Wellbeing (APP-043)
9	Vulnerable Groups	Request for vulnerable groups to be more clearly discussed, including associated with age and disabilities, as well as schools and care homes.	The health baseline will be used to evidence conclusions on the sensitivity of the population and relevant sub-populations. High sensitivity for sub-populations will be assumed, including linked to mental health.	Sections 18.4 and 18.8 of ES Chapter 18: Health and Wellbeing (APP-043) ES Appendix 18.5.1 Health Baseline Trends, Priorities and Vulnerable Groups (APP-206) ES Appendix 18.5.2 Health and Wellbeing Baseline Data Tables (APP-207)
10	EQuIA	Request that an Equality Impact Assessment be undertaken.	The ES coverage of vulnerable sub-populations and the conclusions on significance will consider the potential for health inequalities, including disproportionate or differential effects between the general population and vulnerable populations.	Sections 18.4 and 18.8 of ES Chapter 18: Health and Wellbeing (APP-043) ES Appendix 18.5.1 Health Baseline Trends, Priorities and Vulnerable Groups (APP-206) ES Appendix 18.5.2 Health and Wellbeing Baseline Data Tables (APP-207)
11	Assessment of Effects	Request for the assessment of combined and cumulative effects.	Combined and cumulative effects will be assessed in the ES.	Sections 18.10 and 18.11 of ES Chapter 18: Health and Wellbeing (APP-043)
12	Air Quality	Request for quantitative air quality health impacts by assessment year, including the difference with and without the scheme.	Quantitative analysis will be undertaken and reported in the ES.	Section 18.8 of ES Chapter 18: Health and Wellbeing (APP-043) ES Appendix 18.8.1 Quantitative Health Assessment Results (APP-206)
13	UFPs	Request for discussion of UFPs and monitoring.	Discussion of UFPs will be included, including on scientific literature. Separate UFP modelling is not supported by methods. Monitoring is being considered.	Section 18.8 of ES Chapter 18: Health and Wellbeing (APP-043)
14	Ar Quality	Concern about the non-threshold nature of some air pollutants and whether WHO guidelines should be used.	Non-threshold health effects will be reflected in the ES health assessment. UK statutory thresholds are the health protection standard for assessment.	Section 18.8 of ES Chapter 18: Health and Wellbeing (APP-043)
15	Air Quality	Various requests for clarification on the air quality and noise methods, metrics and assumptions.	Covered by those technical teams and other TWGs.	Section 18.4 of ES Chapter 18: Health and Wellbeing (APP-043)

16	Noise	Concern that noise benefits from quieter aircraft and technologies are being used up and benefits not realised by local communities.	Using the Government's preferred metric LAeq, the airport will be quieter by 2038 than it was in 2019 even though the number of flight movements will have increased.	Para 18.8.201 of ES Chapter 18: Health and Wellbeing (APP-043)
17	Noise	Request for the Noise Insulation Scheme to be reviewed to further offset the social cost, provide flexibility and provide local benefits.	The Noise Insulation Scheme is already more generous than required by guidance and will continue to be considered.	Section 18.8 of ES Chapter 18: Health and Wellbeing (APP-043)  ES Appendix 14.9.10 Noise Insulation Scheme (APP-180)
18	Noise	Request for night-time noise other than from flights to be considered in terms of its potential to disturb sleep.	Air and surface noise will be assessed and reported in the ES.	Section 18.8 of ES Chapter 18: Health and Wellbeing (APP-043)  ES Appendix 14.9.2: Air Noise Modelling (APP-172)
19	Assessment of Effects	Request clarification of mitigation to avoid significant effects on local healthcare facilities	Information about the workforce will support routine service planning. Healthcare needs are being assessed and reported in the ES.	Section 18.8 of ES Chapter 18: Health and Wellbeing (APP-043)
20	Assessment of Effects	Request for further analysis of the impact on local primary care, A&E and the broader Integrated Care System.	Information about the workforce will support routine service planning. Healthcare needs are being assessed and reported in the ES.	Section 18.8 of ES Chapter 18: Health and Wellbeing (APP-043)
21	Assessment of Effects	Request to assess impact on community facilities and services due to temporary workers and their families.	Information about the workforce will support routine service planning. Healthcare needs are being assessed and reported in the ES.	Para 18.8.544 onwards of ES Chapter 18: Health and Wellbeing (APP-043)
22	Assessment of Effects	Request to consider the impact on ambulance services and A&E	Information about the workforce will support routine service planning. Healthcare needs are being assessed and reported in the ES.	Para 18.8.244 of ES Chapter 18: Health and Wellbeing (APP-043)  Para 18.8.518 of ES Chapter 18: Health and Wellbeing (APP-043)
23	Consultation	Request for consultation with healthcare providers on potential health service impacts.	Information about the workforce will support routine service planning. Healthcare needs are being assessed and reported in the ES.	Table 18.3.2 of ES Chapter 18: Health and Wellbeing (APP-043)
24	Port Health	Notes the ES will include a forecast of Port Health statistics and that this can inform healthcare planning.	Agreed	Section 18.8 of ES Chapter 18: Health and Wellbeing (APP-043)
25	Assessment of Effects	Request for consideration of how hospital admissions correlate with passenger numbers.	Current information shows the relationship is more complex than just number of passengers.	Para 18.8.3 of ES Chapter 18: Health and Wellbeing (APP-043)
26	Assessment of Effects	Request for further analysis of the impact on healthcare of natural population growth.	Socio-economic assessment is considering population growth. Taxation funding of public services will be discussed in the ES.	Para 18.8.543 of ES Chapter 18: Health and Wellbeing (APP-043)
27	Open Space	Request for more detail on open spaces re-provision and how it benefits local communities including providing contiguous access.	Consideration is being given to connecting new and existing open spaces and providing benefits.	Section 18.8 of ES Chapter 18: Health and Wellbeing (APP-043)
28	Lighting Impacts	Concern about the effects on the A23 along Riverside Garden Park in terms of lighting impacts, including from night working.	Lighting impacts assessed in the ES and unlikely to have significant population health implications.	Section 18.8 of ES Chapter 18: Health and Wellbeing (APP-043)
29	PRoW	Notes the health baseline for the area highlights physical activity opportunity as important and this should be taken into account in relation to impacts to Riverside Garden Park and National Cycle Route 21.	The health baseline will be used to evidence conclusions on the sensitivity of the population and relevant sub-populations. High sensitivity for sub-populations will be assumed, including linked to physical activity levels.	Section 18.8 of ES Chapter 18: Health and Wellbeing (APP-043)
30	Assessment of Effects	Request for the impacts of additional road accident risk to be considered.	Risks are addressed through the highway design and will be assessed in the ES.	Section 18.8 of ES Chapter 18: Health and Wellbeing (APP-043)  ES Chapter 12: Traffic and Transport (APP-037) ES Appendix 5.3.4 Major Accidents and Disasters (APP-089)

Reference	Matter	Overview of Position	SCC position - SCC require GAL to:	GAL Response	Application Document Signpost
T.01.01	Legislation and Policy	The scope of the legislation and policy is comprehensive and there is nothing further to consider in relation to this matter.	<p>Explain their policy fit/compliance with SCC LTP: increase in planes and cars vs. carbon emissions/Net Zero/health etc. Demonstrate the assumption that Heathrow R3 would have no impacts on passenger forecasts at Gatwick.</p>	<p>Section 12.2 of Chapter 12: Traffic and Transport (PINS Doc Ref: App-037) to the Environmental Statement (ES) identifies the legislation and policy context for traffic and transport which has been taken into account in the environmental impact assessment. This includes, as listed in Table 12.2.2 of that same document, the Surrey Local Transport Plan, and specifically the aim to significantly reduce transport carbon emissions to meet the net zero challenge and to support delivery of Surrey's other priority objectives of enhancing Surrey's economy and communities, as well as the health and quality of life of Surrey's residents.</p> <p>In respect of this policy, as part of its Application, GAL has developed Surface Access Commitments (SACs) (PINS Doc Ref: APP-090) which identify the sustainable transport mode share outcomes which GAL is committing to, together with commitments to the interventions and measures that GAL will use to achieve those mode shares. These interventions include measures that will increase public transport choice and encourage the use of public transport and active travel modes, alongside measures aim to reduce levels of private care use amongst air passengers and staff. Further information on the SACs is included in Section 12.8 of Chapter 12 and within the SACs document itself.</p> <p>Chapter 12 also provides commentary on the potential implication of a Heathrow third runway (Section 12.11.79 to 12.11.81), with a fuller analysis provided in Section 20.7.2 to 20.7.6 of Chapter 20: Cumulative Effects and Inter-relationships to the ES (PINS Doc Ref: APP-045).</p>	<p>Sections 12.2, 12.8, 12.11.79 to 12.11.81 and Table 12.2.2 of Chapter 12: Traffic and Transport (PINS Doc Ref: APP-037)</p> <p>Section 20.7.2 to 20.7.6 of Chapter 20: Cumulative Effects and Inter-relationships to the ES (PINS Doc Ref: APP-045)</p> <p>Surface Access Commitments (SACs) (PINS Doc Ref: APP-090)</p>
			<p>Address the issues raised re. the DCO plans and schedules / identify which have not been actioned - see "DCO Plans and Schedules Comment Sheet_SCC (Atkins)_v1" sent to Darren Atkins by Judith Jenkins 28/3/23</p>	<p>The comments received from SCC have been considered as part of the development of the final DCO plans and schedules that are now available on the PINs website. We will discuss our responses to the comments raised and confirm if there are any further matters outstanding as part of SoCG discussions.</p>	<p>DCO Schedules: Schedules 1, 3, 4, 5 and 6 of the Draft Development Consent Order (PINS Doc Ref - App-002)</p> <p>Drawing sets illustrating surface access highways proposals: Works Plans (PINS Doc Ref: APP-017), Rights of Way and Access Plans (PINS Doc Ref: APP-018), Parameter Plans (PINS Doc Ref: APP-019), Surface Access Highways Plans (PINS Doc Ref: APP-020 to APP-022), Traffic Regulation Plans (PINS Doc Ref: APP-023 to APP-025)</p> <p>Surface Access Landscape Proposals: Appendix 8.8.1: Outline Landscape and Ecology Management Plan - Part 1. (PINS Doc Ref: APP-113)</p> <p>Land Requirements: Land Plans (PINS Doc Ref: APP-014)</p>
T.02.01	Assessment Methodology – scope of matters assessed	The scope of the matters scoped into the assessment is agreed.	<p>Provide further detail of basis for determining the thresholds of assessment and significance. For instance, all active travel links should be in scope for assessment regardless of changes in traffic volumes.</p>	<p>Section 12.4 of Chapter 12 to the ES explains the methodology applied to the assessment of traffic and transport effects, with Table 12.4.1 summarising the issues considered as part of the assessment.</p> <p>The IEMA guidance on assessing the environmental effects of road traffic recognises that small changes in traffic flow are unlikely to have any more than a negligible effect on receptors such as pedestrians and cyclists. Consequently, to allow the ES to focus on locations where significant effects may be more likely, the thresholds described in Section 12.4 of Chapter 12 to the ES (paragraph 12.4.10 in particular) have been adopted to screen out locations where traffic flow changes are expected to be small and to lead to negligible effects.</p>	<p>Section 12.4 of Chapter 12 to the ES</p>
T.02.02	Assessment Methodology – study area	The extent of the area of detailed modelling and the study areas (including links) are agreed.	<p>Include roads to the north and west of the existing VISSIM model to capture important junctions.</p>	<p>Section 12.4.6 to 12.4.15 of Chapter 12 summarises the study area and modelling approach taken in respect of the highway network. The area covered by the microsimulation model remains as indicated in the Autumn 2021 consultation, as it is considered that the strategic model, which covers a much wider area but includes the local road network in the vicinity of the Airport, provides an appropriate means of assessing local network performance.</p>	<p>Section 12.4.6 to 12.4.15 of Chapter 12 to the ES</p>
T.02.04	Assessment Methodology – baseline studies	The methodology for the baseline studies, including a desk study and site-specific surveys, is agreed.	<p>Undertake model sensitivity tests to address areas of concern, such as: - Age of data (2016) and impacts of Covid (distribution and volume of demand)</p>	<p>Section 12.4.25 to 12.4.31 of Chapter 12 explains the methodology applied to determine the baseline for the purposes of the assessment work and the justification for the use of the 2016 data (see sections 12.4.30 and 12.4.31 in particular).</p> <p>Section 5.3.26 of the Transport Assessment (Pins Doc Ref: App-258) references DFT's recently published (May 2023) guidance which supplies advice regarding the treatment of the Covid-19 pandemic in transport modelling. As noted in that section, GAL is carefully reviewing this guidance and will consider the need to for any comparative analysis and additional modelling in this post-application period.</p>	<p>Section 12.4.25 to 12.4.31 of Chapter 12 to the ES</p>

			Address the issues raised re. the WCHAR report / identify which have not been actioned (see "Gatwick NRP WCH Assessment - Atkins Comment Sheet - Issue V1.1" sent by Rich Franklin to Darren Atkins on Mon 30/01/2023 @ 11:31)	The comments received from SCC have been considered as part of the subsequent development of the WCHAR Assessment Report. We will share updated materials, discuss our responses to the comments raised and seek to confirm if there are any further matters outstanding in a Highways design meeting to be arranged as part SoCG discussions.	N/A
			Address the issues raised re. the WCHAR review report / identify which have not been actioned (see "Gatwick NRP GG 142 WCH Prelim Review Report - Atkins Comment Sheet - Issue V1.1" sent by Rich Franklin to Darren Atkins on Mon 06/02/2023 15:34)	The comments received from SCC have been considered as part of the subsequent development of the WCHAR Review Report. We will share updated materials, discuss our responses to the comments raised and seek to confirm if there are any further matters outstanding in a Highways design meeting to be arranged as part SoCG discussions.	N/A
T.02.05	Assessment Methodology – assessment criteria and assignment of significance	The assessment criteria and assignment of significance is agreed.	Allow SCC to review the ES before confirming agreement with this statement, as we have not seen evidence that comments raised in Statutory Consultation Dec 21 feedback have been addressed	Noted. To assist, Section 12.3 to Chapter 12 of the ES provides a summary of key comments received and a signposting to how they've been addressed in the Application. In particular, Tables 12.3.2 and 12.3.3 highlight such information in respect of the Autumn 2021 and Summer 2022 consultations.	Section 12.3 of Chapter 12 to the ES.
T.03.01	Assumptions and Limitations of the Assessment	The assumptions and limitations of the assessment are agreed.			
			Undertake model sensitivity tests to address areas of concern, such as: - On busiest airport days and busiest network days - To determine what measures are required to meet/exceed targets of improving the public transport experience radically – to achieve 60% of our passengers, and 50% of our staff, using public transport to the airport (R2 ASAS) - Impact of full car park on the network (and what that means to mode share)	Section 12.5 of Chapter 12 to the ES identifies and explains the information and assumptions which have informed the assessment of traffic and transport effects. Technical details regarding such assumptions are further identified in Annex B - Strategic Transport Modelling Report (PINS Doc Ref: App - 260) to the Transport Assessment.	Section 12.5 of Chapter 12 to the ES Annex B - Strategic Transport Modelling Report to the Transport Assessment
T.04.01	Baseline Environment – current baseline	The baseline environment is agreed.			
			The models have been developed to standards that depart from WebTAG. Whilst that is pragmatic, it does not mean that SCC can be sure that the approach being adopted will meet important mode share targets and that the impacts are properly assessed and understood. As a result, SCC require GAL to: Include a maximum value from an 'uncertainty range' be added to all highway link flows to understand the possible impact (i.e. if 10% accuracy on link flow was used for validation rather than 5%, add 5% to the modelled flow). Consider the impacts of public transport model validation in terms of in-vehicle time and screen line performance and whether these forecasts are too optimistic in terms of public transport mode share. Confirm whether there is any interaction between the highway and public transport models and thus bus and coach travel might not have accurate journey times modelled. Confirm that the Variable Demand Model (VDM) excludes trip frequency and time of day choice as described in TAG UNIT M2.1 Variable Demand Modelling (para 4.5.1) and what the impact of this is on demand for travel. Undertake turning movement validation such that performance of the highway model at locations pertinent to the development of the microsimulation model. Give reassurances that public transport forecasts are correct as the model seems to over-estimate the public transport and Greater London and the South East and does so significantly for the county of Surrey - which could under-estimate highway impacts. Undertake a sensitivity test to demonstrate that the realism test results for car fuel costs, which is at the high end or indeed higher than TAG criteria, would not result in a greater shift away from car than might be otherwise be expected to happen.	Please see response in relation to Reference T.03.01 above.	N/A
T.04.02	Baseline Environment – future baseline	The description of the future baseline scenarios for the periods 2024 to 2029, 2029, 2032 and 2047 is agreed.	Provide further details of traffic volumes on the SRN as we have concern that in reality traffic would use the LRN.	Section 11 of Annex B to the Transport Assessment provides the assessment of the future baseline, including in relation to the highway network.	Section 11 of Annex B - Strategic Transport Modelling Report to the Transport Assessment

T.04.03	Baseline Environment – future baseline interventions	The interventions (incl. committed highway schemes, rail schemes and assumptions for bus, coach, car parking and charges) included in the strategic modelling for the future baseline scenarios are agreed.	Explain why, if the PEIR states (12.6.57) that BAU and NRP would have common targets, covered by the ASAs of a 60% sustainable travel mode share for passengers by 2030, that this is not met in neither scenario. Without such explanation, the future baseline cannot be considered as the right place to ascertain the impacts of the NRP.	Section 12.6.68 to 12.6.76 to Chapter 12 to the ES explains the role of the existing Airport Surface Access Strategy in the future baseline modelling for the traffic and transport assessment. Specific to the Northern Runway Project, the Surface Access Commitments identify the mode share targets which build upon the existing ASAs measures and explains the interaction between the SACs and the ASAs (see section 2 of the SACs).  Section 12.8 to Chapter 12 to the ES provides further clarification on the role of the SACs in the assessment of the traffic and transport effects. The modelling demonstrates that the identified measures and interventions 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% in the future baseline years, and 54% to 56% in the "with Project" scenario.	Section 12.6.68 to 12.6.76 to Chapter 12 to the ES  Surface Access Commitments
			Confirm parking numbers (there is a discrepancy in the ES project description); clarify reasoning/justification for reduction in spaces per staff/passengers; clarify why highway mitigation has not been reduced in line with reduction in number of additional spaces proposed (18,500 to minimal); clarify position re. offsite car parking; provide parking strategy	Section 5.2.83 to 5.2.90 of Chapter 5: Project Description (PINS Doc Ref: App-030) to the ES explains the car parking proposals included as part of the Application and the rationale which has informed the same.  Specific to off-site car parking, Commitment 8 to the SAC confirms GAL's commitment to provide funding to support effective parking controls and/or monitoring on surrounding streets if considered necessary by the relevant local authority, and/or to support local authorities in their enforcement actions against unauthorised off-airport passenger car parking.	Section 5.2.83 to 5.2.90 of Chapter 5: Project Description to the ES  Surface Access Commitments
			Confirm whether they have permission for the additional 6,570 spaces that are assumed in the base?	Section 4.4.6 and 4.4.7 of Chapter 4: Existing Site and Operation (PINS Doc Ref: APP-029) to the ES provides the planning status and anticipated timeline for the new car parks proposed in the absence of the Project.	Section 4.4.6 and 4.4.7 of Chapter 4: Existing Site and Operation to the ES
			State mechanism for ensuring that parking is not overprovided - DCO requirement? The principle of waiving or capping GAL's parking-related permitted development rights as part of a DCO related S106?	As noted in earlier response, the car parking proposals and their justification are included in Sections 5.2.83 to 5.2.90 of the Project Description. In addition, and in recognition of the Surface Access Commitments, GAL has committed to using parking charges to influence passenger travel choices to achieve the necessary mode share outcomes specified in the SACs.	Sections 5.2.83 to 5.2.90 of the Project Description.
			The charging mechanism for parking/airport access that is fed into the model needs to be tied into a permission if the outcome mode share is demonstrated to be dependent upon at least that level of charge	Sections 12.8.5 to 12.8.9 of Chapter 12 to the ES identifies and explains the surface access interventions, including parking pricing, included within the strategic transport model. As noted in Section 12.8.6, whilst a level of charge has been identified for the purposes of the model, the SACs do not commit to a specific price as GAL needs to be able to retain flexibility to adjust charges as necessary to respond to progress in achieving the committed mode share outcomes.	Sections 12.8.5 to 12.8.9 of Chapter 12 to the ES
T.0.5.01	Key Project Parameters	The maximum design scenarios are agreed.	Address the issues raised re. the Highways Design Strategy report / identify which have not been actioned (see "GAL NRP DCO_Review of Highways Design Strategy Report_v1" sent by Sue Janota to Darren Atkins on Thu 16/02/2023 @ 15:46)	The comments received from SCC have been considered as part of the subsequent development of the Highways Design Strategy Report. We will share updated materials, discuss our responses to the comments raised and seek to confirm if there are any further matters outstanding in a Highways design meeting to be arranged as part SoCG discussions.	N/A
			Address the issues raised re. the Longbridge Roundabout Departures from Standard / identify which have not been actioned (see "Gatwick NRP DCO_SCC Departures Review_v2" sent by Mike Green to Darren Atkins on Fri 10/03/2023 16:33)	The comments received from SCC have been considered as part of the subsequent development of the Longbridge Roundabout Departures from Standard submission documents. We will share updated materials, discuss our responses to the comments raised and seek to confirm if there are any further matters outstanding in a Highways design meeting to be arranged as part SoCG discussions.	N/A
			Address the issues raised re. the Drainage Strategy Report which have not been actioned sent by Mike Burch to Darren Atkins 30/9/22	Updated Drainage Strategy Report issued on 27/03/23 with responses to comments raised by SCC. A further review will be undertaken as part of SoCG discussions to confirm if there are any issues that remain outstanding.	N/A
			Address the issues raised re. the Maintenance and Operations Report and Statutory undertakers diversion report which have not been actioned sent by Judith Jenkins to Darren Atkins 13/1/23	Updated copies of the Maintenance and Operations Report and Statutory Undertakers Diversions Report were issued on 14/07/23 with responses to comments raised by SCC. A further review will be undertaken as part of SoCG discussions to confirm if there are any issues that remain outstanding.	N/A
			Address the issues raised re. the Structures Option Report which have not been actioned sent by Alan Mclean to Darren Atkins 17/1/23	Updated Structures Options Reports were issued on 27/03/23 with responses to comments raised by SCC. A further review will be undertaken as part of SoCG discussions to confirm if there are any issues that remain outstanding.	N/A
			Address the issues raised re. the RSA / identify which have not been actioned (see "Gatwick NRP_RSA Response Report Review_v1_Issue" sent by Mike Green to Darren Atkins on 18/04/23)	Following subsequent discussions with SCC, these items are expected to be discussed further as part of SoCG discussions following progression of discussions regarding the departures from standard.	N/A
			Confirm how the proposals fit in with the proposed Horley business park	As explained in response to the equivalent point in Table 12.3.2 of Chapter 12 to the ES, as there are no firm proposals for Horley Business Park it is not included in the core scenario considered in the transport model given its level of uncertainty. This approach is in keeping with TAG Unit M4. Instead, it is considered as part of the cumulative effects assessment discussed in Section 12.11 of Chapter 12. The South Terminal roundabout improvements proposed as part of the Project do not preclude the opportunity for access to be provided for the Business Park should it ultimately become necessary for that development.	Table 12.3.2 and Section 12.11 of Chapter 12 to the ES.

T.05.02	Mitigation and Enhancement Measures Adopted as Part of the Project	The mitigation and enhancement measures are agreed.	Provide further detail behind assumptions that bus and coach operators will increase services to meet demand. Demonstrate the impacts of situations in which dynamic car park pricing meaning that the car parks will be 'operationally' full. Provided bus priority where it would assist bus/coach accessibility and does not hinder active travel accessibility on every new/altered junction. Increase the frequency on existing routes or create new routes as a result of the NRP that serve the SCC area for both bus and rail modes. Undertake road improvements in a phased way before the northern runway comes into routine use.	Section 11 of the Transport Assessment explains the existing bus and coach provision at the Airport and the assumptions made in respect of their services under both the future baseline and with Project scenarios. In particular, Section 11.3.17 (by reference to the Surface Access Commitments) identifies the improvements in bus and coach provision as part of the Project and the financial support which GAL is committing to to ensure the same. Sections 11.3.20 to 11.3.25 compares the future baseline and with project scenarios in respect of bus and coach journeys and highlights that bus and coach operators are able to adjust capacity to manage demand more readily than other modes, e.g. rail.	Section 11 to the Transport Assessment.
			Contribution to Brighton Mainline Upgrade Programme (BMUP) and CARS based on % impact as GAL NRP will increase demand on services while improvements will also benefit GAL to achieve ambitious modeshare targets	Section 9.4.19 to 9.4.25 provides commentary in respect of the BMUP and CARS and confirms that as such improvements are not sufficiently advantage to be considered as committed at this stage (applying the TAG Unit M4 classification), such improvements have not been included in the strategic transport model, but GAL will continue to work closely with Network Rail to support such improvements.	Section 9.4.19 to 9.4.25 to the Transport Assessment.
			Make bus improvements relevant to SCC? (More/Increased services, bus priority at junctions + BSIP? - Redhill-Horley-Gatwick metros 100 corridor has scope to become a Superbus network)	Please see response in the first row to this specific question reference above.	N/A
			Confirm how the North Downs Line services would change as part of the scheme	As noted in Section 9.6.4 and 9.6.5 of the Transport Assessment, the impact of the Project on North Downs Line services is expected to be very small. Seated Load Factors would be slightly higher with the Project than in the future baseline. There would be sufficient seated capacity in all years on the North Downs Line in the with Project scenario, except in 2047 (07:00-08:00) where the Seated Load Factor would increase to just above 1.0 between Reigate and Redhill. This would also occur in the future baseline and would not be worsened by the Project. It indicates low density standing on the short journey leg between Redhill and Reigate, and there would still be spare standing capacity at this time.	Section 9.6.4 and 9.6.5 of the Transport Assessment
			Confirm that the highway improvements will be made before Northern Runway comes into use	Table 12.8.1 of Chapter 12 to the ES explains the mitigation proposed as part of the Project and how such measures have been secured. Specific to the highway improvement works, the modelling shows that they will be required for the Project by the assessment year 2032 (i.e. 3 years after the modelled runway opening year). Accordingly, the commitment to have completed those works by the 3rd anniversary of the commencement of dual runway operations (unless otherwise agreed with National Highways as the relevant authority) is secured pursuant to Requirement 6(2) of Schedule 2 to the draft DCO (PINS Doc Ref: App-006).	Table 12.8.1 of Chapter 12 to the ES. Requirement 6(2) of Schedule 2 to the draft DCO
			Confirm monitoring/what happens if modeshare targets not met	Section 6 of the Surface Access Commitments sets out GAL's proposed approach to monitoring and reporting on the commitments set out in that document, through the production of an Annual Monitoring Report (AMR), together with the steps which it will take in circumstances where the AMR shows that the mode share commitments have not been met or, in GAL's opinion (acting reasonably), that they may not be. This approach builds on the existing process for monitoring ASAS targets and the development of Actions Plans in consultation with the Transport Forum Steering Group, which has seen GAL continue to invest in achieving sustainable transport mode shares.	Section 6 of the Surface Access Commitments.
T.06.01	Assessment of Effects – Initial Construction Phase: 2024-2029	The assessment of effects for the initial construction phase period of 2024 to 2029 is agreed.	(GAL have shown some detailed construction information - SCC has raised specific initial queries. Key areas = Longbridge Roundabout area and Balcombe Road + Construction routing shows traffic making U-turn at Longbridge roundabout - will need to understand impact)	Section 5.3 of the Project Description describes the proposed construction approach for the Project which has informed the assessment.	Section 5.3 of the Project Description Buildability Report (PINS Doc Ref: APP-079 to APP-081)
			Confirm if any construction is taking place beyond 2029? (based on title of matter)	Following from the response above, the indicative construction sequencing is included at Table 5.3.1 and section 5.3.55 onwards of the Project Description describes the anticipated construction activities which will continue beyond assessment year 2029, including in respect of the surface access highway improvements (sections 5.3.71 to 5.3.74).	Table 5.3.1 and Section 5.3.55 onwards of the Project Description
			Improve mitigation for footpath diversions (some lengthy and unsuitable)	Appendix 19.8.1: Public Rights of Way Management Strategy to Chapter 19 of the ES (PINS Doc Ref: App - 215) describes GAL's approach to managing impacts on Public Rights of Way (PROW) because of the construction and operation of the Project to reduce disruption to users of such PROWs as far as possible. Requirement 22 of Schedule 2 to the draft DCO secures that detailed PROW implementation plans for individual PROWs would be developed prior to the commencement of construction (to be in general alignment with the PROW Management Strategy) and subject to prior approval by the relevant planning authority.	Appendix 19.8.1 of the Chapter 19 to the ES Requirement 22 of Schedule 2 to the draft DCO

T.06.02	Assessment of Effects – Opening Year: 2029	The assessment of effects for the opening year of 2029 is agreed.	Undertake additional microsimulation and junction modelling in proximity to the airport (and wider than considered at present). Demonstrate that volumes of traffic forecast on SRN are variable and that that SRN would have capacity for this extra traffic, such that resilience to problems and the impact on the LRN is as reported.	Microsimulation modelling has been carried out for 2032 and 2047 with and without the Project, covering the network in the vicinity of the Airport, as set out in Section 13 of the Transport Assessment. The area covered by the microsimulation model remains as indicated in the Autumn 2021 consultation, as it is considered that the strategic model, which covers a much wider area but includes the local road network in the vicinity of the Airport, provides an appropriate means of assessing local network performance. The effects of the Project in relation to driver delay have been considered, as explained in Section 12.9 of Chapter 12 to the ES and Section 12 of the Transport Assessment. The strategic modelling work, described in Section 12 of the Transport Assessment, considers 2029, 2032 and 2047 with and without the Project and demonstrates the effects on the performance of the wider SRN and the local road network within the modelled area.	Sections 12 and 13 of the Transport Assessment Section 12.9 of Chapter 12 to the ES
T.06.03	Assessment of Effects – Interim Assessment Year: 2032	The assessment of effects for the Interim Assessment Year of 2032 is agreed.	At this stage - we have focused on overall effects and will consider the particular years in more detail once we have the necessary information.	Noted.	N/A
T.06.04	Assessment of Effects – Design Year: 2047	The assessment of effects for the Design Year of 2047 is agreed.		Noted.	N/A
T.07.01	Potential Changes to the Assessment as a Result of Climate Change	The consideration of potential changes to the assessment as a result of climate change is agreed.		Noted.	N/A
T.08.01	Cumulative Effects	The zone of influence and list of other developments and plans considered within the cumulative effects assessment is agreed.		Noted.	N/A
T.08.02	Cumulative Effects – 2029	The cumulative effects assessment for the year of 2029 is agreed.		Noted.	N/A
T.08.03	Cumulative Effects – 2032	The cumulative effects assessment for the year of 2032 is agreed.		Noted.	N/A
T.08.04	Cumulative Effects – 2047	The cumulative effects assessment for the year of 2047 is agreed.		Noted.	N/A
T.09.01	Inter-Related Effects	The identified topics for inter-related effects are agreed.		Noted.	N/A
		NB: This does not equate to agreement on the complete scope of the identified inter-related effects. Please refer to the suite of SoCGs for agreement on the specific topics.		Noted.	N/A
T.10.01	Surface Access Commitments – mode share commitments	The mode share commitments within the Surface Access Commitments are agreed.	Query whether targets ambitious enough + need to be compared with BAU	As noted in earlier responses, Section 12.8 to Chapter 12 to the ES explains the approach proposed in respect of the Surface Access Commitments, including the mode share targets in respect of air passenger and staff journeys. Sections 12.8.12 and 12.8.13 provide the comparison with the future baseline mode shares and show the improvements provided as a result of the Project. Section 7 to the Surface Access Commitments identifies the further aspirational mode share-targets which go beyond the committed outcomes under the SACs, and which GAL will strive to achieve in line with its wider aspirations for sustainable transport to and from the airport.	Section 12.8 to Chapter 12 to the ES Section 7 to the Surface Access Commitments
T.10.02	Surface Access Commitments – further actions	The suite of further actions under the Surface Access Commitments are agreed.	Provide confidence that the traffic models are sufficiently robust to be giving accurate forecasts of the impacts of the commitments. Given that the commitments are not met regarding public transport mode share, provide further measures to meet the commitments.	Please see responses to earlier questions in respect of the approach taken to the development and methodological approach followed in respect of the strategic transport model and its outputs, including in relation to the surface access commitments.	N/A
T.10.03	Securing mitigation – Surface Access Commitments	The securing mechanism for the Surface Access Commitments (via the Section 106 Agreement) is agreed.	SCC need to further review the mechanisms in light of the order and completion of T.10.02	Noted. The requirement to comply with the Surface Access Commitments is secured through Requirement 20 of Schedule 2 to the draft DCO.	The Surface Access Commitments, secured by Requirement 20 of Schedule 2 to the draft DCO.
T.10.04	Outline Construction Workforce Travel Plan	The Outline Construction Workforce Travel Plan [APP-TBC] is agreed.	SCC need to review the document	Noted. The Outline Construction Workforce Travel Plan is submitted as Annex 2 to Appendix 5.3.2: Code of Construction Practice (CoCP) (PINS Doc Ref: App-084) and secured by Requirement 13 of Schedule 2 to the draft DCO.	Annex 2 to Appendix 5.3.2: Code of Construction Practice Requirement 13 of Schedule 2 to the draft DCO
T.10.05	Securing mitigation – Travel Plan	The provision of a Travel Plan (incl. ongoing monitoring) for construction and operation in accordance with the Outline Construction Workforce Travel Plan [APP-TBC] is agreed. The securing mechanism (via the Section 106 Agreement) is agreed.	SCC need to review the document	As above.	N/A
T.10.06	Securing mitigation – Construction Traffic Management Plan	The Construction Traffic Management Plan [APP-TBC] is agreed. The securing mechanism (via the Section 106 Agreement) is agreed.	SCC need to review the document	Noted. The Outline Construction Traffic Management Plan is submitted as Annex 3 to the CoCP (PINS Doc Ref: App-085) and secured by Requirement 12 of Schedule 2 to the draft DCO.	Annex 3 to Appendix 5.3.2: Code of Construction Practice Requirement 12 of Schedule 2 to the draft DCO
			Assess the impact of construction traffic at the Longbridge Roundabout (routing shows traffic making U-turn at Longbridge roundabout) Confirm time of year of construction/assess impact (concern about time of year / construction coinciding with Summer)	Section 15 of the Transport Assessment provides an assessment of the Project's construction activities on the transport network. Section 15.5.12 to 15.5.15 identifies the proposed works in respect of the Longbridge roundabout with Section 15.6 providing the assessment conclusions. See response above.	Section 15 of the Transport Assessment Section 15 of the Transport Assessment

Tracker 3: Summary of Issues - March 2023

Overarching Documentation			
No.	LAs Comments	GAL Response	Signposting to DCO Application
1	Draft DC Order, or at least draft text for Requirements, including information on proposed approach and fees for discharge of requirements;	<p>A note titled 'Approach to Securing Mitigation' was issued to the LAs on 28th April 2023 setting out the role and content of the draft Development Consent Order (dDCO) and Section 106 Agreement.</p> <p>The dDCO has been submitted as part of the DCO Application and is available to view on PINS website. The proposed Requirements are included in Schedule 2.</p> <p>A summary of the proposed Heads of Terms for the new section Section 106 Agreement and the DCO Requirements is provided in Table 5.2 of the Planning Statement.</p>	Draft Development Consent Order (Doc Ref. 2.1) [APP-006] and Planning Statement (Doc Ref. 7.1) [APP-245]
2	Draft Mitigations Route Map;	The Mitigation Route Map has been submitted as part of the DCO Application and is available to view on PINS website.	ES Appendix 5.2.3: Mitigation Route Map (Doc Ref. 5.3) [APP-078]
3	Draft s106 – Heads of Terms, and proposed drafts for specific obligations.	<p>A note titled 'Approach to Securing Mitigation' was issued to the LAs on 28th April 2023 setting out the role and content of the draft Development Consent Order (dDCO) and Section 106 Agreement.</p> <p>Table 5.2 of the Planning Statement, submitted as part of the DCO Application, contains the proposed Heads of Terms for the new Section 106 Agreement. The Planning Statement is available to view on PINS website.</p>	Table 5.2 of the Planning Statement (Doc Ref. 7.1) [APP-245]
4	Draft Statement of Reasons	The Statement of Reasons has been submitted as part of the DCO Application and is available to view on PINS website.	Statement of Reasons (Doc Ref. 3.2) [APP-010]
5	Draft ES Chapter Description of Development	ES Chapter 5 containing the Project Description has been submitted as part of the DCO Application and is available to view on PINS website.	Chapter 5 of the ES Project Description (Doc Ref. 5.1) [APP-030]
6	Draft ES Chapter Approach to Assessment	ES Chapter 6 setting out the Approach to the Environmental Assessment has been submitted as part of the DCO Application and is available to view on PINS website.	ES Chapter 6: Approach to Environmental Assessment (Doc Ref. 5.1) [APP-031]
7	Draft Scheme Layout Drawings	<p>Updates on the design and development of a draft Design and Access Statement (DAS) was provided to LAs through the TWGs, for example at the Planning TWGs on 5th July 2022, 19th October 2022, 23rd November 2022 and on 17th January 2023. A draft of the DAS, presenting the statement's structure and design, was also shared with the LAs on 23rd November 2022.</p> <p>The DCO Application was accompanied by a suite of application drawings, including Works Plans and Parameter Plans, along with further detail in the Design and Access Statement.</p>	Book 2 containing the Application Drawings [APP-013 to APP-025]; and the Design and Access Statement, split across five volumes (Doc Ref. 7.3) [APP-253 to APP-257]

Aviation Capacity and Forecasting			
No.	LAs Comments	GAL Response	Signposting to DCO Application
8	Explanation as to the basis upon which the specific projections of usage of the airport in terms of aircraft movements, type of aircraft, time of day and passenger characteristics, with and without the North Runway, were prepared. The top down benchmarking is not sufficient to verify that reasonable assumptions have been used. The specific implications of assumptions about capacity being brought forward at other London airports is not transparently set out;	These issues have been extensively discussed through the Technical Working Group meetings. ES Appendix 4.3.1: Forecast Data Book (FDB) (Doc Ref. 5.3) [APP-075] presents the air traffic and other forecasts that have informed the assessment of economic and environmental impacts of the Project. Detailed information and forecasts are provided on all issues raised by the authorities. The FDB sets out the approach and methodology to the Project forecasts (Section 5.5); explains the assumptions that have been made regarding the capacity of other London Airports (Section 7.3); and the time	ES Appendix 4.3.1: Forecast Data Book (Doc Ref. 5.3) [APP-075]
9	Justification for the runway movement rate that is claimed for the two runways as this relies on one minute separations between all departing aircraft regardless of departure route, which is not currently permitted in the UK;	Annex 7 to ES Appendix 4.3.1: Forecast Data Book (FDB) (Doc Ref. 5.3) [APP-075] sets out correspondence between GAL and York Aviation, including engagement on Departure-Departure separation times between different aircraft types provided in August 2022. Annex 8 of the FDB contains a note on the Simulation Report on Proposed Dual Runway Operations at London Gatwick Airport, also provided to York Aviation in August 2022. This matter has been discussed extensively through the TWGs and is being addressed through the SoCG process. The Annexes demonstrate GAL's engagement on these issues. That engagement continues through the SoCG process.	ES Appendix 4.3.1: Forecast Data Book (Doc Ref. 5.3) [APP-075]

10	Clear explanation for the relationship between the use of the runway and the projected use of specific departure routes, including the implications for noise assessment and transparency about the relationship between the assumptions used and implications of future potential airspace change;	Annexes 7 and 8 to ES Appendix 4.3.1: Forecast Data Book (FDB) (Doc Ref. 5.3) [APP-075] contain detailed notes on airspace assumptions and a Simulation Report on Proposed Dual Runway Operations at London Gatwick Airport. The notes explain the departures routes that have been considered in the Project forecasts.  The air noise assessment within the Environmental Statement assumes the routing of aircraft to and from the main runway and from the northern runway would remain as it is today, as discussed in Section 14.4 of ES Chapter 14: Noise and Vibration. This is because the Project can operate using these routes without need for airspace change. When the likely outcome of the FASI-South airspace is known then the noise impacts of that change will be assessed as part of that process. Further details of FASI-South and the approach are set out in ES Chapter 6: Approach to Environmental Assessment.	ES Appendix 4.3.1: Forecast Data Book (FDB) (Doc Ref. 5.3) [APP-075], ES Chapter 14: Noise and Vibration (Doc Ref. 5.1) [APP-039] and ES Chapter 6: Approach to Environmental Assessment (Doc Ref. 5.1) [APP-031]
11	Explanation of the different socio-economic benefits of the proposal, particularly in terms of where such benefits would arise and how they would impact the individual host authorities.	The socio-economic effects of the Project are explained in Section 17.9 of ES Chapter 17: Socio-Economics (Doc Ref. 5.1) [APP-042] and sets out where the effects are assessed to be beneficial under each assessment year. Section 8 of the Needs Case (Doc Ref. 7.2) [APP-250] also summarises the economic benefits of the Project.	ES Chapter 17: Socio-Economics (Doc Ref. 5.1) [APP-042] and Needs Case (Doc Ref. 7.2) [APP-250]

Air Quality			
No.	LAs Comments	GAL Response	Signposting to DCO Application
12	Provision in an electronic format of the detailed air quality model verification data - GAL shared the overall findings of the model verification exercise on 11th Nov 2022 but in the absence of the detailed data in an electronic format the local authorities are unable to check the results for themselves. This is particularly important given the issues with air quality model at the PEIR stage of the process and the limited time available after the DCO submission – necessary to spend time now on checking the model's performance in the first instance rather than focusing solely on the model outputs for the future.	The detailed air quality model verification data is contained in ES Appendix 13.6.1: Air Quality Data and Model Verification, and is available to view on PINS website.  It should be noted the model used at the PEIR stage was appropriate and fit for purpose, the 'issues' noted would not change the conclusion of no significant impacts. The requested technical amendments and additional receptor points to be assessed in the Environmental Statement have all been taken into account as discussed in detail and agreed with the LAs and their technical advisors (AECOM) through the TWG process. Details on how these recommendations and clarifications have been considered in the ES are also reported in ES Chapter 13 on Air Quality (Doc Ref. 5.1) [APP-038].  For the DCO Application, details of the air quality assessment methodology are included in ES Appendix 13.4.1: Air Quality Assessment Methodology (Doc Ref. 5.3) [APP-158] and details of the model verification process and results are provided in ES Appendix 13.6.1: Air Quality Data and Model Verification (Doc Ref. 5.3) [APP-159]. The full suite of the air quality results is contained six parts across APP-162 to APP-167. The detail provided within the Environmental Statement is sufficient to demonstrate the method and analysis undertaken to reach the conclusions of significance.	ES Chapter 13: Air Quality (Doc Ref. 5.1) [APP-038]; ES Appendix 13.4.1: Air Quality Assessment Methodology (Doc Ref. 5.3) [APP-158]; ES Appendix 13.6.1: Air Quality Data and Model Verification; and ES Appendix 13.9.1: Air Quality Results Tables and Figures - Parts 1 to 6 (Doc Ref. 5.3) [APP-162 to APP-167]

Air Noise			
No.	LAs Comments	GAL Response	Signposting to DCO Application
13	Modelling 2019 ATMs with 2032 fleet technology.	As explained by GAL within the TWGs and Noise Envelope meetings, this would be an unrealistic situation as Gatwick Airport is expected to continue to grow within the capacity of its single runway. This assumption was made in the 2019 Masterplan document and in the Future Baseline presented in the PEIR. The DCO Application has therefore not undertaken this modelling as it would present an unrealistic situation.  The assessment methodology for air noise modelling is set out in paragraphs 14.4.46 and 14.4.47 of ES Chapter 14: Noise and Vibration (Doc Ref. 5.1) [APP-038], which is underpinned by the Forecast Data contained in ES Appendix 4.3.1 (Doc Ref. 5.3) [APP-075].	ES Chapter 14: Noise and Vibration (Doc Ref. 5.1) [APP-038] and ES Appendix 4.3.1 Forecast Databook [APP-075].

14	Forecast single mode for future years.	<p>This issue has been discussed in the TWGs. GAL responded to a technical note issued on behalf of Local Authorities on 6th January 2023 in relation to noise metrics. The response was circulated to Local Authorities on 3rd February 2023 as part of papers for Noise TWG 4 of 8th February 2023. The issue is addressed directly on page 374 of ES Appendix 14.9.9: Report on Engagement on the Noise Envelope.</p> <p>Leq 16 hr and Leq 8 hour are defined as average modal split by DFT when defining LOAEL. This is because long term noise effects such as annoyance and sleep disturbance are not determined by either noise levels on westerly operating days or by noise levels on easterly operating days, but by the combination of both as experienced in the relevant proportions over the long term. CAP 1506 Survey of Noise Attitudes 2014: Aircraft Noise and Annoyance, Second Edition, July 2021 concludes: that "Practically, this means that single-mode contours are unsuitable for decision making, but that they may be helpful for portraying exposure and changes to exposure. Of the average-day modes, the existing 92-day summer average mode was found to correlate better than shorter average modes. There was therefore no evidence found to support a change from the current practice of basing LAeq,16h on an average summer day."</p> <p>Single mode noise contours would not provide an appropriate representation of noise effects. However, GAL has issued information on noise levels on easterly and westerly days, because this may be helpful in illustrating changes in exposure. For this GAL chose 7 Community Representative Locations (See ES Figure 14.9.1) as described in para 14.9.150 and 14.9.151 of the ES Chapter 14: Noise and Vibration. Paras 14.9.152 to 14.9.158 of ES Chapter 14 describe the noise changes that the NRP will produce, including on easterly days and westerly days, using the data in terms of Leq, 16 hr, Leq 8 hr, N65, and N60 for average mode, westerly mode and easterly mode provided for 2032 with the Project, the 2032 base and 2019 base, for the central case and slower transition fleet in 14 tables 4.2.1 to 4.2.14 of ES Appendix 14.9.2: Air Noise Modelling.</p>	ES Appendix 14.9.9: Report on Engagement on the Noise Envelope (Doc Ref. 5.3) [APP-179], ES Chapter 14: Noise and Vibration (Doc Ref. 5.1) [APP-039] and ES Appendix 14.9.2: Air Noise Modelling (Doc Ref 5.3) [APP-172]
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Visual Impact and Land /Water /Bio-Diversity			
No.	LAs Comments	GAL Response	Signposting to DCO Application
15	Draft Design and Access Statement, or at least the draft design principles for it;	<p>Updates on the design and development of a draft Design and Access Statement (DAS) was provided to LAs through the TWGs, for example at the Planning TWGs on 5th July 2022, 19th October 2022, 23rd November 2022 and on 17th January 2023. A draft of the DAS, presenting the statement's structure and design, was also shared with the LAs on 23rd November 2022.</p> <p>The final DAS has been submitted as part of the DCO Application and is available to view on PINS website. The design principles are contained in Appendix A1 to the DAS, comprising site-wide design principles, building specific design principles, drainage design principles and detailed landscaping principles.</p>	Design and Access Statement, split across five volumes (Doc Ref. 7.3) [APP-253 to APP-257]
16	Options reporting and the assessment of alternatives reporting;	<p>An explanation of the assessment of alternatives was presented in the PEIR, in particular PEIR Chapter 3 on the Needs and Alternatives Considered. Subsequently, further explanation and updates on the alternatives assessment has been presented at Planning TWGs, e.g. 5th July 2022 meeting, and a focused consultation on highway improvements in Summer 2022 (see Section 2.2 of the Consultation Document explaining the optioneering and assessment process).</p> <p>ES Chapter 3: Alternatives Considered forms part of the DCO Application and sets out the reasonable alternatives considered by GAL during the optioneering and Project design process. The ES Chapter is accompanied by Figures 3.3.1 to 3.3.18 which illustrates the alternatives that have been considered by the Project, in addition to ES Appendix 3.5.1 which contains the full appraisal of the Project components and design aspects against the assessment criteria.</p>	ES Chapter 3: Alternatives Considered (Doc Ref. 5.1) [APP-028], ES Alternatives Considered Figures (Doc Ref. 5.2) [APP-049] and ES Appendix 3.5.1: Options Appraisal Tables (Doc Ref. 5.3) [APP-073]
17	Parameter Plans (with illustration plans) on designs for the various Project buildings and infrastructure elements including lagoons, bridge widening, boundary fencing, bunds etc to inform consideration of the application and establishment of 'Requirements';	<p>Updates on the design and development of a draft Design and Access Statement (DAS) was provided to LAs through the TWGs, for example at the Planning TWGs on 5th July 2022, 19th October 2022, 23rd November 2022 and on 17th January 2023. A draft of the DAS, presenting the statement's structure and design, was also shared with the LAs on 23rd November 2022.</p> <p>The Parameter Plans form part of the DCO Application and are available to view on PINS website. Supporting detail and illustrative drawings are contained in the DAS, which describes the development by zones (8 zones in total). DAS Volumes 2 to 4 contain the detailed proposals for each development zone.</p>	Design and Access Statement, split across five volumes (Doc Ref. 7.3) [APP-253 to APP-257] and Parameter Plans (Doc Ref. 4.7) [APP-019]

18	Vegetation retention and removal plans especially along the road corridors;	<p>Illustrative landscape proposals are set out in ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan and is available to view on PINS website. Annex 4 of the oLEMP contains preliminary Tree Removal and Protection Plans for the surface access proposals, contained within Parts 3 and 4 of the oLEMP. In addition to this, Figures 1.2.1 to 1.2.15 of the oLEMP Part 1 contains illustrative landscape planting proposals for the surface access improvements at South Terminal roundabout, North Terminal roundabout and Longbridge roundabout, in addition to landscaping proposals for Museum Field and Car Park B.</p> <p>Additional supporting imagery of the landscaping proposals for the surface access proposals, including the relationship to the existing trees, is also contained in the Design and Access Statement Volume 3 (Section 5.8 on the Surface Access Corridor zone).</p>	ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan (Doc Ref. 5.3) [APP-113 to APP-116] and Design and Access Statement Volume 3 (Doc Ref. 7.3) [APP-255]
19	Information regarding Construction Compounds & location of activities within them	<p>The location and role of the construction compounds was presented to the LAs at the Surface Access TWG on 31st January 2023.</p> <p>Within the DCO Application, an explanation of the construction compounds is contained in paragraphs 5.3.84 to 5.3.111 of the ES Chapter 5: Project Description. This includes an overview of what each compound is expected to comprise. ES Figure 5.2.1f shows the location and extent of the proposed temporary construction compounds. The precise configuration of the compounds would be determined post consent.</p> <p>Further information on the use of the temporary construction compounds is provided in Section 7 of ES Appendix 5.3.1: Buildability Report Part A and summarised in Section 8 of the Design and Access Statement Volume 5.</p>	ES Chapter 5: Project Description (Doc Ref. 5.1) [APP-030], ES Figure 5.2.1f (Doc Ref. 5.2) [APP-053], ES Appendix 5.3.1: Buildability Report Part A (Doc Ref. 5.3) [APP-079] and Design and Access Statement Volume 5 (Doc Ref. 7.3) [APP-257].
20	Details of emerging strategies, needed so we can assess how they interrelate, for example the: Drainage Strategy, the Ground Noise Mitigation Strategy and the Landscape Strategy; Or how the Drainage Strategy interrelates with the detailed highway scheme; Or how the ASAS, the Parking Strategy and the highway schemes interrelate	Section 1.3 of the ES Appendix 5.2.3: Mitigation Route Map provides an explanation and overview of the 'Control Documents' for the Project. The control documents comprise the strategies, plans and statements to manage the delivery and operation of the Project. Each Chapter of the ES has taken into account the relevant control documents and which is set out in the section titled 'Mitigation and Enhancement Measures Adopted as Part of the Project' of each ES Chapter and discussed within the body of each chapter.	ES Appendix 5.2.3: Mitigation Route Map (Doc Ref. 5.3) [APP-078]
21	Evidence supporting conclusions on need for on-airport office provision;	The Project proposes one new office block as set out in paragraph 5.2.82 of ES Chapter 5: Project Description, largely driven by the proposed conversion of the existing Destinations Place offices to a hotel. The demand for on-airport office provision was informed by an airport related employment land study which has developed over the course of the pre-application stage of the Project, and been reported to both Socio-Economics and Economics TWGs and Planning TWGs. Notably, the assessment methodology was presented at a TWG on 28th August 2019; the initial findings presented on 30th January 2020; and which was followed by the statutory consultation stage. Work was subsequently undertaken to review and update the 2018/19 work and the findings were presented at TWGs on 14th June 2022 and 6th December 2022 along with additional follow-up responses provided to any post-meeting queries and in the Summer 2022 Consultation material. The evidence presented between June and December 2022 is unchanged and forms the basis of the DCO Project proposals.	n/a - please see response
22	Evidence supporting conclusions on need for hotel provision;	The Project proposes four additional hotels, as set out in paragraph 5.2.81 of ES Chapter 5: Project Description (Doc Ref. 5.1) [APP-030]. The demand for on-airport hotel provision was informed by an airport related employment land study which has developed over the course of the pre-application stage of the Project, and been reported to both Socio-Economics and Economics TWGs and Planning TWGs. Notably, the assessment methodology was presented at a TWG on 28th August 2019; the initial findings presented on 30th January 2020; and which was followed by the statutory consultation stage. Work was subsequently undertaken to review and update the 2018/19 work and the findings were presented at TWGs on 14th June 2022 and 6th December 2022 along with additional follow-up responses provided to any post-meeting queries and in the Summer 2022 Consultation material. The evidence presented between June and December 2022 is unchanged and forms the basis of the DCO Project proposals.	n/a - please see response

23	Information on Post implementation monitoring for drainage / Detailed drainage questions – some still outstanding?	<p>GAL already maintains systems to monitor water quality. GAL would continue to monitor the quality of water discharges in accordance with environmental permits, as set out in Table 11.8.1 of ES Chapter 11: Water Environment. Regular monitoring of any change to the channel bed and banks is proposed, in the vicinity of the River Moel, Museum Field and Car Park X post-completion of the Project, which is also explained in Table 11.8.1 of ES Chapter 11: Water Environment.</p> <p>Requirements 10 and 11 of Schedule 2 to the draft DCO provide that no part of the authorised development (save for the identified exceptions) are to commence until written details of the surface and foul water drainage for that part, including means of pollution control and monitoring, have been submitted to and approved in writing by the named relevant authority. Such drainage details submitted for approval are to be in general accordance with the drainage design principles included in Appendix 1 to the <u>Design and Access Statement</u>.</p>	ES Chapter 11: Water Environment (Doc Ref. 5.1) [APP-036], Design and Access Statement Volume 5 (Doc Ref. 7.3) [APP-257] and the draft Development Consent Order (Doc Ref. 2.1) [APP-006]
24	Evidence of Thames Water’s response on the Waste Water Treatment works, and whether it has capacity for NRP and planned Local Plan growth;	<p>An overview of engagement with Thames Water is contained in Tables 11.3.3 and 11.3.4 of ES Chapter 11: Water Environment (Doc Ref. 5.1) [APP-036].</p> <p>ES Chapter 11 provides an assessment of impact of the potential increase in wastewater volumes as a result of the Project and is accompanied by ES Appendix 11.9.7: Wastewater Assessment (Doc Ref. 5.3) [APP-150], which provides the technical information to support the assessment. As explained in paragraph 0.1.3 of ES Appendix 11.9.7, the assessment demonstrates that with the provision of new infrastructure proposed as part of the Project, Gatwick Airport’s network can safely cope with the additional wastewater flows. A response from Thames Water regarding the ability of their infrastructure to convey and treat the increased flows is awaited, but to date no indication of impediment has been received by GAL.</p> <p>As explained in paragraph 11.9.2 of ES Chapter 11: Water Environment, Thames Water will complete an assessment of the impact of an increase in passenger numbers as a result of the Project on water treatment capacity at Crawley and Horley Sewage Treatment Works (STW). GAL has engaged with Thames Water (including by providing ES Appendix 11.9.7: Wastewater Assessment (Doc Ref. 5.3)) to allow Thames Water to <del>assess the impacts to the receiving STW in line with their statutory duties</del></p>	ES Chapter 11: Water Environment (Doc Ref. 5.1) [APP-036] and ES Appendix 11.9.7: Wastewater Assessment (Doc Ref. 5.3) [APP-150]
25	Information on odour from new works at the STW;	ES Chapter 13: Air Quality has undertaken a qualitative assessment of the effects and potential changes to odour as a result of the operational period of the Project. The assessment considers the risk of odour from airport operations (including water treatment works, CARE, aircraft emissions and additional use of fuel farms). Consideration has been paid to the proposed water treatment works and CARE facility and the likely odour effects. Further commentary on the assessment is contained in paragraphs 8.5.21 to 8.5.23 of the Planning Statement.	ES Chapter 13: Air Quality (Doc Ref. 5.1) [APP-038] and Planning Statement (Doc Ref. 8.1) [APP-245].
26	Information on impact of increased passenger numbers on Sussex Ambulance Service and A&E;	ES Chapter 18: Health and Wellbeing considers the impact of airport passengers on local healthcare capacity, including ambulance and A&E services, and is available to view on PINS website. The 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 as well as visitors and workers. The assessment is contained in paragraphs 18.8.512 to 18.8.618 of ES Chapter 18.	ES Chapter 18: Health and Wellbeing (Doc Ref. 5.1) [APP-043]
27	Information on impact on Charlwood Park Farmhouse listed building to back up conclusions, and on potential improvements to setting of Edgeworth House and Wing House listed buildings;	<p>The approach and initial findings from the assessment of the Project’s effects on the historic environment was discussed at the Land and Watet TWG on 31st October 2022.</p> <p>In the DCO Application, ES Chapter 7: Historic Environment considers the potential effects of the Project on the historic environment resources. This includes an assessment of Charlwood Park Farmhouse, Edgeworth House and Wing House.</p> <p>The assessment demonstrates that there are no significant effects to Charlwood Park Farmhouse as a result of the Project. The Project does not propose improvements to the settings of Wing House and Edgeworth House as both are located an area of surface car parks and modern buildings associated with the operational use of the airport, including the Marriott Hotel and are not significantly affected by the Project.</p>	ES Chapter 7: Historic Environment (Doc Ref. 5.1) [APP-033]
28	Lighting Strategy (e.g. particularly impact on Charlwood Park Farmhouse);	<p>An Operational Lighting Framework has been submitted as part of the DCO Application in ES Appendix 5.2.2 (Doc Ref. 5.3) [APP-077] and sets out the framework for the use of external lighting for the operation of the Project. Construction period lighting requirements are defined within ES Appendix 5.3.2: Code of Construction Practice (CoCP) (Doc Ref. 5.3) [APP-082].</p> <p>ES Chapter 7: Historic Environment (Doc Ref. 5.1) [APP-033] takes account of both construction and operational lighting in considering the effects on the historic environment. In respect of Charlwood Park Farmhouse (Grade II* Listed), the "Zone of Theoretical Visibility" analysis shows no intervisibility between the Project and Charlwood Park Farmhouse. This has also been borne out by site visits and were presented at the Land &amp; Water TWG on 31st October 2022.</p>	ES Appendix 5.2.2: Operational Lighting Framework (Doc Ref. 5.3) [APP-077] and ES Appendix 5.3.2: Code of Construction Practice (Doc Ref. 5.3) [APP-082]

29	Draft Carbon Action Plan	The Carbon Action Plan (CAP) has been submitted as part of the DCO Application and is available to view on PINS website. Compliance with the CAP is secured pursuant to Requirement 21 of Schedule 2 to the draft DCO.	ES Appendix 5.4.2: Carbon Action Plan (Doc ref. 5.3) [APP-091] and Requirement 21 of Schedule 2 to the draft DCO (Doc Ref. 2.1) [APP-006]
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Socio-Economic / Economic - Key Documents Requested in Draft			
No.	LAs Comments	GAL Response	Signposting to DCO Application
30	Population and Housing Effects report;	<p>The assessment methodology and emerging findings of the Populations and Housing Effects assessment have been presented through a number of Socio-Economic TWGs, including the sessions on 16th May 2022, 7th July 2022 and 6th December 2022.</p> <p>The final report is contained in ES Appendix 17.9.3: Assessment of Population and Housing Effects (Doc Ref. 5.3) [APP-201] and is available to view on PINS website.</p>	ES Appendix 17.9.3: Assessment of Population and Housing Effects (Doc Ref. 5.3) [APP-201]
31	Airport-Related Employment Land Study;	<p>An airport related employment land study has developed over the course of the pre-application stage of the Project, and has been reported to both Socio-Economics and Economics TWGs and Planning TWGs. Notably, the study methodology was presented at a TWG on 28th August 2019; the initial findings presented on 30th January 2020; and which was followed by the statutory consultation stage. Work was subsequently undertaken to review and update the 2018/19 work and the updated findings were presented at TWGs on 14th June 2022 and 6th December 2022 along with additional follow-up responses provided to any post-meeting queries and in the Summer 2022 Consultation material. The evidence presented between June and December 2022 is unchanged and forms the basis of the DCO Project proposals. We will look to discuss if there are any further outstanding matters or queries in relation to the study as part of the</p>	n/a - please see response
32	Economic Impact Assessment	<p>The assessment methodology and emerging findings of the Economic Impact Assessments have been presented at a number of Socio-Economic TWGs, including sessions on 16th May 2022, 7th July 2022 and 28th September 2022.</p> <p>The Local Economic Impact Assessment is contained in ES Appendix 17.9.2 (Doc Ref. 5.3) [APP-200] and the National Economic Impact Assessment is contained in Appendix 1 to the Needs Case (Doc Ref. 7.2) [APP-251]. Both documents are available to view on PINS website.</p>	ES Appendix 17.9.2: Local Economic Impact Assessment (Doc Ref. 5.3) [APP-200] and Needs Case Appendix 1: National Economic Impact Assessment (Doc Ref. 7.2) [APP-251]
33	Employment, Skills and Business Strategy.	<p>The Employment, Skills and Business Strategy is contained in ES Appendix 17.8.1 (Doc Ref. 5.3) [APP-198] of the DCO Application and available to view on PINS website. A summary of engagement with LAs and other stakeholders that has informed the preparation of the ESBS is contained in paragraphs 2.5 to 2.2.13 of the Strategy. This includes the Socio-Economic TWGs, as well as separate 'Insight Workshops' with LA Officers.</p>	ES Appendix 17.8.1: Employment, Skills and Business Strategy (Doc Ref. 5.3) [APP-198]

Socio-Economic / Economic - Detailed information requested			
No.	LAs Comments	GAL Response	Signposting to DCO Application
34	Socio-economic baseline conditions to be presented at a local authority level;	<p>An overview of the baseline environment is set out in Section 17.6 of ES Chapter 17: Socio-Economic, including the economic and labour market baseline, population and housing baseline, and community facilities baseline. Detailed data is provided in ES Appendix 17.6.1: Socio-Economic Data Tables for all of the socio-economic characteristics profiled across all the study areas, as well as at the individual Local Authority level.</p> <p>The methodology and presentation of the assessment was discussed and agreed through a series of Socio-Economics TWGs, including sessions on 16th May, 7th July, 28th September, 18th November and 6th December 2022, and 31st July 2023</p>	ES Chapter 16: Socio-Economics (Doc Ref. 5.1) [APP-042] and ES Appendix 17.6.1: Socio-Economic Data Tables (Doc Ref. 5.3) [APP-197]
35	A focused assessment of the population and housing impacts of the NRP on the six local authorities in closest proximity to the airport (Crawley, Horsham, Mid Sussex, Reigate and Banstead, Tandridge and Mole Valley);	<p>The DCO Application was accompanied by ES Appendix 17.9.3: Assessment of Population and Housing Effects which contains an assessment of the population and housing effects of the employment generated by the Project. The assessment is available to view on PINS website.</p> <p>The assessment focuses on the labour and housing market areas, but also sets out the information and data at the Local Authority level. This approach to the population and housing assessment has been presented through a number of Socio-Economics TWGs, including the sessions on 16th May 2022, 7th July 2022 and 6th December 2022.</p>	ES Appendix 17.9.3: Assessment of Population and Housing Effects (Doc Ref. 5.3) [APP-201]

36	Employment impacts at a local authority level including the impacts of the scheme on local labour supply. This should in particular address concerns raised in the PEIR that the NRP operational phase may result in local labour shortages, particularly in Crawley;	ES Chapter 17: Socio-Economics provides an assessment of the Project's effects on the labour market during construction and operational periods. This is underpinned by Section 5 of ES Appendix 17.9.3: Assessment of Population and Housing Effects which provides the labour supply analysis, from both a labour demand and housing delivery perspective.  The assessment focuses on the labour and housing market areas, but also sets out the information and data at the Local Authority level. Please refer to Section 5 of ES Appendix 17.9.3.	ES Appendix 17.9.3: Assessment of Population and Housing Effects (Doc Ref. 5.3) [APP-201]
37	A detailed forecast of all economic activity that will have an impact on labour supply at a local authority level;	ES Chapter 17: Socio-Economics provides an assessment of the potential socio-economic effects of the Project, including effects on employment and the labour market. economic activity We have explained the approach to assessment at TWGs. The assessment focuses on the five defined study areas, but also provides employment estimates at the Local Authority level. Detailed data on economic activity at the local authority level is contained ES Appendix 17.6.1: Socio-Economic Data Tables, namely Tables 2.1.5 and 2.1.6.	ES Chapter 17: Socio-Economics (Doc Ref. 5.1) [APP-042] and ES Appendix 17.6.1: Socio-Economic Data Tables (Doc Ref. 5.3) [APP-197]
38	A detailed breakdown of the numbers and types of jobs that would be created during both construction and operation;	A breakdown of the numbers and types of jobs to be generated in the construction and operational phases of the Project is contained in Section 17.9 of ES Chapter 17: Socio-Economics, highlighted in separate tables for each stage of the ES assessment.	ES Chapter 17: Socio-Economics (Doc Ref. 5.1) [APP-042]
39	Analysis by GAL of the impact of the scheme on the labour supply for other non-airport related employment sectors;	ES Chapter 17: Socio-Economics provides an assessment of the Project's effects on the labour market during construction and operational periods. This is underpinned by Section 5 of ES Appendix 17.9.3: Assessment of Population and Housing Effects which provides the labour supply analysis, from both a labour demand and housing delivery perspective.	ES Chapter 17: Socio-Economics (Doc Ref. 5.1) [APP-042] and ES Appendix 17.9.3: Assessment of Population and Housing Effects (Doc Ref. 5.3) [APP-201]
40	An assessment of the housing demand created by the scheme – impacts to be specifically identified for those local authority areas in closest proximity to the airport;	The DCO Application was accompanied by ES Appendix 17.9.3: Assessment of Population and Housing Effects which contains an assessment of the population and housing effects of the employment generated by the Project. This includes an assessment of the demand for different tenures of housing, particularly in those areas immediately adjacent to Gatwick Airport where the majority of employment associated with the Project will be based. The assessment is available to view on PINS website.  The assessment focuses on the labour and housing market areas, but also sets out the information and data at the Local Authority level. This approach to the population and housing assessment has been presented through a number of Socio-Economics TWGs, including the sessions on 16th May 2022, 7th July 2022 and 6th December 2022.	ES Appendix 17.9.3: Assessment of Population and Housing Effects (Doc Ref. 5.3) [APP-201]
41	An assessment of the affordable housing need (for those LPAs in closest proximity to the airport) created by the scheme – this should link with work on the number and types of jobs created by the NRP;	ES Appendix 17.9.3: Assessment of Population and Housing Effects contains an assessment of the population and housing effects of the employment generated by the Project. Sections 7.4, 7.5 and 8.1 provides an assessment of the demand for affordable housing. The assessment is available to view on PINS website.  The assessment focuses on the labour and housing market areas, but also sets out the information and data at the Local Authority level. This approach to the population and housing assessment has been presented through a number of TWGs, as explained above.	ES Appendix 17.9.3: Assessment of Population and Housing Effects (Doc Ref. 5.3) [APP-201]
42	An assessment of the requirements for temporary workers and resulting impact on the private rented sector and market for short term lets (taking into account current pressures caused by migration on hotels and temporary accommodation);	ES Appendix 17.9.3: Assessment of Population and Housing Effects contains an assessment of the population and housing effects of the employment generated by the Project. Section 6 of ES Appendix 17.9.3 considers the potential impact that temporary construction workers associated with the Project may have on housing need, specifically the need for accommodation associated with workers moving to the area on a temporary basis. In particular, Section 6.2 provides an assessment of impacts on the private rented sector and Section 6.3 provides an assessment on alternative forms of accommodation, e.g. hotels and B&B accommodation.  This approach to the population and housing assessment has been presented through a number of Socio-Economics TWGs, including the sessions on 16th May 2022, 7th July 2022 and 6th December 2022.	ES Appendix 17.9.3: Assessment of Population and Housing Effects (Doc Ref. 5.3) [APP-201]

43	A clear narrative around the methodology for assessing the magnitude of socio-economic effects, plus details on the guidance and standards that have been used to inform the assessment;	The policy, guidance and standards that have directed the socio-economic assessment are set out in Section 17.2 of ES Chapter 16: Socio-Economics. The methodology and approach to defining magnitude and sensitivity is contained in Section 17.4 of ES Chapter 16.  The assessment approach and methodology has been explained through the series of Socio-Economic TWGs.	ES Chapter 16: Socio-Economics (Doc Ref. 5.1) [APP-042]
44	Information on GVA generated by employment at Gatwick Airport and qualitative information on the level of employees and local spend by employees;	ES Appendix 17.9.2: Local Economic Impact Assessment sets out the direct, indirect, induced and catalytic employment and value expected to be generated by the Project, including gross value added. This includes increases in the scale of economic activity on the site (i.e. direct impacts) and from employees spending their wages (i.e. induced impacts).	ES Appendix 17.9.2: Local Economic Impact Assessment (Doc Ref. 5.3) [APP-200]
45	A forecast of the economic growth in the local area which is unrelated to the airport;	ES Appendix 17.9.2: Local Economic Impact Assessment factors in existing external assessments of baseline employment growth expected to occur, using Cambridge Econometrics forecasts and which have been cross-checked using Experian forecasts. Figure 4.2 of ES Appendix 17.9.2 explains the relationship between the assessment of the economic impacts between the existing Gatwick Airport as a whole, and with and without the Project.	ES Appendix 17.9.2: Local Economic Impact Assessment (Doc Ref. 5.3) [APP-200]
46	Provision of baseline data on the number of Gatwick-related businesses and jobs at the local authority level;	ES Appendix 17.9.2: Local Economic Impact Assessment sets out the baseline data for GAL related employment and other non-GAL related firms at the airport. A breakdown of the occupational categories are contained in Annex 3 of ES Appendix 17.9.2.	ES Appendix 17.9.2: Local Economic Impact Assessment (Doc Ref. 5.3) [APP-200]
47	An assessment of the community impacts (effects on facilities and services) as a result of the NRP;	ES Chapter 17: Socio-Economics provides an assessment of the socio-economic effects of the Project, including impacts on community infrastructure (including facilities and services).	ES Chapter 17: Socio-Economics (Doc Ref. 5.1) [APP-042]
48	Detailed measures to prioritise local supply chains (to be set out in the ESBS);	ES Appendix 17.8.1: Employment, Skills and Business Strategy (ESBS) sets out the strategy for how GAL would seek to enhance the skills, employment and training opportunities for both existing and new members of the labour market during construction and operation of the Project. The objectives within the ESBS focus on employment and skills activities within the Local Study Area and Local Market Area. It is proposed that the ESBS will be secured pursuant to the new s106 Agreement (see Table 5.2 of the Planning Statement).	ES Appendix 17.8.1: Employment, Skills and Business Strategy (Doc Ref. 5.3) [APP-198] and Planning Statement (Doc Ref. 7.1) [APP-245]
49	Clarity on outcomes that are already identified in relation to the airport's current configuration, and the additional measures (value added) that would be achieved in relation to the NRP;	The DCO Application is accompanied by both a National and Local Economic Impact Assessment, contained in Needs Case Appendix 1 and ES Appendix 17.9.2. The National Economic Impact Assessment provides an assessment of the national economic impacts that would result from the Project. The impact of the Project on local employment and gross value added are assessed in ES Appendix 17.9.2.	Needs Case Appendix 1: National Economic Impact Assessment (Doc Ref. 7.2) [APP-251] and ES Appendix 17.9.2: Local Economic Impact Assessment (Doc Ref. 5.3) [APP-200]
50	A qualitative analysis by GAL (Oxera) of the effects of the scheme on FDI;	Section 6.7 of the National Economic Impact Assessment contained in Needs Case Appendix 1 considers the potential welfare benefits from increased productivity as a result of an increase in trade associated with the Project at a national level.  Although it is likely that a share of these productivity benefits would be realised by businesses within the local area around the airport, the assessment approach does not allow for a robust estimation of these local impacts. This is because the elasticities of passengers to trade and of trade to productivity are based on country-level data and cannot be used to understand an effect a regional level, as increased connectivity is likely to affect the trading sectors in each region differently. As a result, it is not possible to quantify the productivity benefits associated with trade at a local level and therefore it is scoped out of the socio-economic assessment. Further detail on this is set out in Table 17.4.2 of ES Chapter 17: Socio-Economics.	Needs Case Appendix 1: National Economic Impact Assessment (Doc Ref. 7.2) [APP-251] and ES Chapter 17: Socio-Economics (Doc Ref. 5.1) [APP-042]
51	A more detailed assessment of the approach to catalytic employment taken by Oxera – e.g. more detail is required around the catchment areas used for each airport and location of business activity relative to the airport. The applicant should set out what they mean by catalytic effects, the assumptions associated with this definition, its baseline position (including future baseline) and what has been discounted to reach a net figure for catalytic effects. Scenario testing also should be undertaken to understand the potential variations with levels of catalytic benefits from other major schemes in the planning pipeline;	Section 6 of ES Appendix 17.9.2: Local Economic Impact Assessment sets out the assessment of the catalytic impact of the Project. This includes an explanation of what is meant by a catalytic effects and the methodology for estimating the effect. Prior to the submission of the DCO Application, a note prepared by Oxera on the methodology for the catalytic impacts was provided to the LAs in July 2023.	ES Appendix 17.9.2: Local Economic Impact Assessment (Doc Ref. 5.3) [APP-200]
52	Direct, induced and catalytic impacts of the project on the Gatwick Diamond area, Five Authorities Area and for the UK. Impacts are also requested to be provided at the local authority level or at least the Northern West Sussex FEMA;	Section 17.9 of ES Chapter 17: Socio-Economics provides an assessment of the indirect, induced, catalytic effects arising from the operational phase of the Project, based on the data in ES Appendix 17.9.2: Local Economic Impact Assessment. The assessment within ES Chapter 17 is provided on the basis of study areas, including Six Authorities Areas and Northern West Sussex Functional Economic Market Area and as well as nationally. Detailed data at the local authority level is contained in Table 3.1.2 of ES Appendix 17.6.1: Socio-Economic Data Tables.	ES Chapter 17: Socio-Economics (Doc Ref. 5.1) [APP-042], ES Appendix 17.6.1: Socio-Economic Data Tables (Doc Ref. 5.3) [APP-197] and ES Appendix 17.9.2: Local Economic Impact Assessment (Doc Ref. 5.3) [APP-200]
53	An assessment of induced effects on construction employment and an assessment of the availability of construction workers by local area;	Detailed analysis of the construction employment expected to be generated by the Project is provided in ES Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note, including an assessment of the potential construction labour supply and their spatial distribution. This data has informed the assessment of the labour market within Section 17.9 of ES Chapter 17: Socio-Economic.	ES Chapter 17: Socio-Economic (Doc Ref. 5.1) [APP-042] and ES Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note (Doc Ref.5.3) [APP-199]

54	An assessment of induced economic activity associated with construction;	Detailed analysis of the construction employment expected to be generated by the Project is provided in ES Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note. This data has informed the assessment of the labour market within Section 17.9 of ES Chapter 17: Socio-Economic. The approach and methodology to the socio-economic assessment was discussed at the Socio-Economic TWGs on 2nd November, 18th November, 6th December 2022, and 31st July 2023.	ES Chapter 17: Socio-Economic (Doc Ref. 5.1) [APP-042]
55	A clear explanation of the calculations concerning the indirect and induced impacts and how these are distributed across the study areas;	Section 5 of ES Appendix 17.9.2: Local Economic Impact Assessment explains the methodology to the assessment of the economic footprint of the Project, including the calculation of indirect and induced impacts, and how they are estimated for each study area.	ES Appendix 17.9.2: Local Economic Impact Assessment (Doc Ref. 5.3) [APP-200]
56	A breakdown of GAL's total workforce by local authority area (current and projected);	Annex 3 of ES Appendix 17.9.2: Local Economic Impact Assessment sets out the baseline data for GAL related employment and other non-GAL related firms at the airport, broken down by occupational categories. Annex 3 provides the current employment baseline (direct, indirect and induced) and the estimated employment levels against the ES assessment years against the occupational categories. This data is defined by the Local Authority areas as well as the ES study areas.  For the construction related employment, ES Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note provides an assessment of the potential construction labour supply and their spatial distribution, defined by Local Authority areas.	ES Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note (Doc Ref. 5.3) [APP-199] and ES Appendix 17.9.2: Local Economic Impact Assessment (Doc Ref. 5.3) [APP-200]
57	Justification and appropriate evidence for the 80% Home Based / 20% Non Home Based ratio that GAL is using;	ES Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note provides an assessment on the likely distribution of the Project's construction workforce, based on two scenarios. Scenario 1 (primary scenario) assumes a split of 80% home-based workers and 20% non-home based workers, and Scenario 2 assumes 100% home-based workers. These two scenarios test the highest likely proportion of non-home based workers (i.e. 20%) and the lowest (i.e. 0%). This approach and justification for Scenario 1 as the primary (worst case) scenario is set out in further detail in Section 4 of ES Appendix 17.9.1, including a comparison to Construction Industry Training Board survey data and GAL's own experience.	ES Appendix 17.9.1: Gatwick Construction Workforce Distribution Technical Note (Doc Ref. 5.3) [APP-199]
58	An assessment of the impact on property values as a result of the scheme (including commercial property values) – as requested by PINS in its PEIR response;	The assessment of any likely significant effects of the Project on property values due to increased frequencies of flights is scoped out of the socio-economic assessment. A detailed explanation of why this is scoped out is contained in Table 17.4.2 of ES Chapter 17: Socio-Economic.	ES Chapter 17: Socio-Economic (Doc Ref. 5.1) [APP-042]
59	An assessment by GAL of whether there is a current and forecast surplus or shortfall in commercial floorspace, identified land allocations and the availability at certain sites within the ARELS FEMA – this should be undertaken at the more local level given the potential for a concentration of the impacts to be felt more locally to the airport. This should also discuss where demand for off-airport employment growth is likely to be located and when this is likely to come forward as the airport grows – it is not realistic to assume that employment floorspace demands can be evenly distributed across the study area, nor that the demands will be split on an equal year-by-year basis across the NRP programme;	An airport related employment land study has developed over the course of the pre-application stage of the Project, and has been reported to both Socio-Economics and Economics TWGs and Planning TWGs. Notably, the study methodology was presented at a TWG on 28th August 2019; the initial findings presented on 30th January 2020; and which was followed by the statutory consultation stage. Work was subsequently undertaken to review and update the 2018/19 work and the updated findings were presented at TWGs on 14th June 2022 and 6th December 2022 along with additional follow-up responses provided to any post-meeting queries and in the Summer 2022 Consultation material. The evidence presented between June and December 2022 is unchanged and forms the basis of the DCO Project proposals. We will look to discuss if there are any further outstanding matters or queries in relation to the study as part of the SoCG discussions.	n/a - please see response
60	Information on the relationship between Economic Impact Assessment and ICF air traffic forecast and to explain the assumptions regarding capacity at other airports, air fare savings, the impact of assuming a 3rd runway at Heathrow and the treatment of the carbon costs in the demand forecasts and in the WebTag appraisal	Section 8.3 of the Needs Case explains the relationship between the air traffic movements (ATM) forecasts and how this will lead to different types of economic impacts.  ES Appendix 4.3.1: Forecast Data Book presents the air traffic and other forecasts that have informed the assessment of economic and environmental impacts of the Project. Section 4 of ES Appendix 4.3.1 explains the implications of Heathrow Airport's third runway, and Section 7.3 explains the assumptions that have been made regarding the capacity of other London Airports.  The National Economic Impact Assessment, contained in Appendix 1 of the Needs Case, provides analysis on air fares. In particular, Section 5.4 of the assessment describes how air fares have been forecast in the baseline, Project and unconstrained scenarios to provide fare modelling analysis. The National Economic Impact Assessment also provides analysis of monetised impacts of greenhouse gas emissions, based on low, central and high carbon price scenarios, within Section 7.3 of the report, with consideration of the impact of capacity expansions at other London Airports (including Heathrow) included in Annex B to the Report.	Section 8.3 of the Needs Case (Doc Ref. 7.3) [APP-250], ES Appendix 4.3.1: Forecast Data Book (Doc Ref. 5.3) [APP-075] and Needs Case Appendix 1: National Economic Impact Assessment (Doc Ref. 7.2) [APP-251]
61	Up to date Travel to Work data that takes into account the implications of COVID.	Section 17.6 of ES Chapter 17: Socio-Economics explains the socio-economic characteristics of the current baseline environment, including the method of travelling to work. Paragraph 17.6.42 of ES Chapter 17 explains the relationship to the Covid-19 pandemic. Detailed data on the method of travel to work at the Local Authority level is contained in ES Appendix 17.6.1: Socio-Economic Tables, namely Table 2.1.25.	Section 17.6 of ES Chapter 17: Socio-Economics (Doc Ref. 5.1) [APP-042] and ES Appendix 17.6.1: Socio-Economic Tables (Doc Ref. 5.3) [APP-197].

Transport and Highways (Surface Access and Active Travel)		
No.	LAs Comments	GAL Response
62	Response to Surrey County Council's extensive 'Issues Tracker	Please refer to separate SCC Transport Issues Tracker.

63	A Designer's Response to the Stage 1 Road Safety Audit for the proposed highway mitigation between the Longbridge roundabout and M23 spur. To detail exactly how the road safety issues are to be addressed and the design amended accordingly;	A Stage 1 Road Safety Audit has been undertaken for the highway improvement works proposed as part of the Project. The draft Stage 1 Road Safety Audit Response Report was shared on 27th March 2023 with SCC, WSCC and National Highways. The agreed actions arising from the Road Safety Audit are being discussed with the relevant highway authorities.	n/a - issued directly to SCC, WSCC and NH
64	The rationale for the reclassifying of the M23 spur to an 'A' class road	The decision to reclassify the M23 Spur to an 'A' road was made following engagement with National Highways after the Autumn 2021 Consultation. The change in classification is expected to contribute to a change in character of the proposed road (e.g. as a result of changes to signage), forming part of a broader package of measures that aim to encourage drivers to adopt appropriate speeds on this section of the scheme with safety benefits for users. Further details are also contained in the technical highway design reports supporting the SoCG process with the Highway Authorities.	n/a
65	A rationale/justification for the desire to reduce the speed limit on London Road A23 to 40mph. An assessment is also required to see whether it accords with WSCC adopted Speed Limit Policy;	<p>The urban/partially built-up characteristics of this section of the A23 London Road combined with the proposals to provide new and upgraded facilities for pedestrians and cyclists alongside and crossing the A23 London Road at the proposed new signal controlled junction with North Terminal Link are considered to most closely align with West Sussex Speed Limit Policy's Functional Hierarchy category for 40mph speed limit roads. It is expected that the proposed speed limit reduction would encourage reduced speeds on the road with safety benefits for all road users including active travel users.</p> <p>West Sussex Speed Limit Policy highlights that <i>"lower traffic speeds may also encourage more walking and cycling"</i>. This aligns with the scheme's objective of increasing sustainable mode share through measures which include the scheme's proposed active travel infrastructure improvements.</p> <p>This topic is being discussed further with WSCC. Further details are contained in technical highway design reports supporting SoCG process with highways authorities.</p>	n/a
66	A commitment to provide a draft copy of the Transport Assessment in advance of submission of the DCO;	<p>The Transport Assessment forms part of the DCO Application and is available to view on PINS website. The main report is contained in APP-258 and its accompanying annexes (Annexes A to E) are contained in APP-259 to APP-263.</p> <p>The draft Transport Assessment was shared with National Highways on 31st May 2023.</p>	Transport Assessment (Doc Ref. 7.4) [APP-258] and Annexes A to E [APP-259 to APP-263]
67	Draft highway boundary plans do not accord with WSCC records for London Road. Agreement needs to be reached as to the revised extent of highway boundaries maintainable by each Highway Authority;	GAL are facilitating with LPAs an understanding of the discrepancy.	n/a
68	The draft PRoW strategy and design detail on active travel routes, including widths, cross sections, crossing details, appearance, and how they meet LTNI/20.	<p>The Project proposes improvements to active travel routes, and which are explained in paragraph 5.2.116 to 5.2.119 of ES Chapter 5: Project Description. The proposals are also shown on Figure 5.2.1d and further details are provided on the Surface Access Highway Plans - General Arrangement Plans.</p> <p>The DCO Application contains the Public Rights of Way Management Strategy under ES Appendix 19.8.1 and which sets out the approach to managing impacts on public rights of way during construction and operation of the Project</p>	ES Chapter 5: Project Description (Doc Ref. 5.1) [APP-030], Figure 5.2.1d (Doc Ref. 5.2) [APP-053], Surface Access Highway Plans - General Arrangement Plans (Doc Ref. 4.8.1) [APP-020] and ES Appendix 19.8.1: Public Rights of Way Management Strategy (Doc Ref. 5.3) [APP-215]

**Tracker 3: Forecasts (based on the draft SoCG)**

Ref	Subject	GAL Position	Local Authority Position
<b>1</b>	<b>Approach to Forecasts</b>		
	Bottom-up inputs	<ul style="list-style-type: none"> <li>- At a constrained airport, bottom-up insights including busy day schedules, airlines, markets, aircraft types etc. are necessary to support assumptions around potential throughput.</li> <li>- A bottom-up view (i.e. airlines/markets) enables GAL to provide context on how the scarce resource of runway capacity can be utilised.</li> <li>- Slot allocation takes into account a wide range of factors that cannot be captured by a top down model (e.g. new entrant vs incumbent status, balance of markets, development of network, competition, season length, traveller regulations and potential other 'local' airport rules).</li> <li>- In a constrained market, bottom-up forecasts will be more accurate and appropriate than top-down forecasts in forecasting how an airport would respond to increased capacity.</li> </ul>	<p>Not agreed</p> <p>The adoption of a bottom up approach to the preparation of the overall demand forecasts over the period to 2047 is not considered robust. Bottom up forecasts are normally only considered reliable over a 5-10 year period. In any event, the use of busy day schedules as the basis of deriving an overall annual forecast relies on the assessment of capacity deliverable with the NRP, which is also not accepted (see above/below).</p> <p>In the absence of properly calibrated 'top down' modelling of how demand would be accommodated across the London airports, it is not possible to determine:  a)the share of the market that Gatwick might attract; and  b)the implications of additional capacity being delivered at other airports, in particular Heathrow</p> <p>The demand forecasts are not considered robust as a basis for assessment of the impacts of the proposal.</p>
	Support of bottom up	<ul style="list-style-type: none"> <li>- Gatwick is the only London airport likely to be able to offer any notable incremental runway capacity in at least the next 10 years</li> <li>- Demand will outstrip supply across the London airports reflecting the growth of outbound and inbound demand</li> <li>- LGW draws demand from across London and the Southeast with 17 million people living within 90 minutes. Gatwick can serve the inbound market well with strong connectivity to London and beyond</li> <li>- With or without the NRP, LGW will once again become constrained in the future</li> </ul>	<p>Not agreed</p> <p>The extent to which Gatwick becomes capacity constrained again with or without the NRP depends on the extent to which other airports deliver incremental capacity, the level of overall market growth, having regard to the need for the industry to cover its carbon and/or carbon abatement costs, and the extent of capacity deliverable from the existing runways.</p> <p>The low demand growth sensitivity case shared with the Host Authorities (Socio-economic TWG in November 2022) showed that the level of projected demand to 2047 is within the level of demand that it is claimed that the existing single runway could accommodate.</p>
	Applying bottom-up forecasts	<p>In these circumstances, it is appropriate to approach forecasting, as follows:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> A peak day schedule (August Friday) is used to model runway holding times.</li> <li><input type="checkbox"/> A commercial Busy Day pipeline of demand is developed in line with annual growth and market share assumptions.</li> <li><input type="checkbox"/> Pipeline demand is added to the 2019 base schedule to fill available capacity, prioritising year-round and new routes.</li> <li><input type="checkbox"/> Year-on year capacity releases are managed so as to maintain operational performance and optimise the use of available capacity.</li> </ul>	<p>Not agreed.</p> <p>Long term demand forecasts produced on this basis are not robust as it is not supported by a robust analysis of the likelihood of the 'pipeline' demand being delivered by reference to underlying demand in each individual market and taking into account the competition from other airports to attract the specific services. The approach adopted is not robust and not transparent.</p>
<b>2</b>	<b>Capacity/utilisation (baseline)</b>		
	LGW, capacity utilisation today (2019/2023)	<ul style="list-style-type: none"> <li><input type="checkbox"/> In the summer season, LGW operates at capacity during the core hours of the day and in the night period.</li> <li><input type="checkbox"/> Demand significantly exceeds capacity as per slot applications of airlines</li> <li><input type="checkbox"/> Any notable capacity that has become available in recent years has been taken up (e.g. through new slot transactions) and trading in slots demonstrates excess demand.</li> <li><input type="checkbox"/> Today, GAL is not able to accommodate all the demand from airline customers or new entrants</li> </ul>	<p>It is noted that the number of annual aircraft movements at Gatwick plateaued in the period 2017-2019 at c.285,000 annual aircraft movements. The DCO single runway baseline is cited as 318,000 aircraft movements, a 12% increase in aircraft movements. This would suggest that GAL envisages being able to accommodate growth in demand beyond current levels without the NRP.</p>
	LON, capacity utilisation today (2019/2023)	<ul style="list-style-type: none"> <li><input type="checkbox"/> LHR/LTN are operating at or very close to their planning caps.</li> <li><input type="checkbox"/> Apart from STN (which requires some development to support), very limited capacity exists in the LON airport system.</li> </ul>	<p>There are proposals to increase capacity at a number of London airports, including London City, London Luton and Stansted (expanded terminal infrastructure). It also remains Government policy under the Airports National Policy Statement that a third runway should be constructed at Heathrow.</p>
<b>3</b>	<b>Capacity (developments by 2030s)</b>		

LGW	<input type="checkbox"/> LGW will only be able to achieve notable growth through larger/fuller aircraft operating more consistent year-round schedules. Limited growth is offered by runway performance which is already operating at 55 movements per hour) <input type="checkbox"/> NRP is assumed to become operational in 2029.	<p>The basis for operating more consistent year-round schedules is not agreed as it would require a different mix of traffic than currently projected for LGW.</p> <p>The assumed operational date of 2029 for the NRP was based on a DCO submission in 2022 so the operating date is not agreed.</p>
Approach to other capacity	<input type="checkbox"/> In principle, it is not appropriate to assume that other planned airport capacity will come forward elsewhere.	<p>Not agreed. Consideration of the effect on demand for LGW of other airport capacity enhancements coming forward at the London airports, and beyond e.g. HS2 access to Birmingham and Manchester Airports, should be transparently considered. It is not reasonable to assume that none of these other developments will be realised.</p>
Other LON	<p>Without prejudice to the above, if assumptions are to be made:</p> <input type="checkbox"/> At its earliest, LHR R3 is not likely to be operational before mid to late 2030s (It is appropriate that R3 is not assumed in LGW's core forecasts) <input type="checkbox"/> LTN is only able to achieve modest growth before the introduction of new terminal facilities, estimated in their DCO application as 2037, nearly a decade after LGW's NRP <input type="checkbox"/> Potential for limited growth at LCY whilst STN's granted planning cap of 43mppa is assumed to continue.	<p>The likely timing of additional capacity being provided at the London airports is accepted.</p> <p>Assumptions regarding greater use of regional airports by regional demand that currently uses the London airports need also to be clearly stated.</p>
<b>4 Capacity - LGW drivers</b>		
Aircraft size	<input type="checkbox"/> Average aircraft sizes continue to increase	<p>Agreed as a general principle but the precise fleet mix is subject to uncertainties relating to the overarching demand forecasts (see above).</p>
Load factor	<input type="checkbox"/> The average rate of seat occupancy is continuing to increase but at a much-reduced rate compared to that achieved leading up to 2019	<p>Agreed as a general principle but there is a commercial ceiling to such growth.</p>
Peak spreading	<input type="checkbox"/> LGW will become less seasonal <input type="checkbox"/> Gatwick's de-peaking trends will continue.	<p>There is limited evidence that LGW has seen substantial seasonal de-peaking. The trends claimed in the demand forecast (PEIR Appendix 4.3.1) are not agreed.</p>
<b>5 Demand</b>		
COVID recovery	<input type="checkbox"/> It is appropriate to assume a return to 2019 levels by 2025. <input type="checkbox"/> Recovery has been rapid but partly restricted due to airline inability to deploy capacity.	<p>It is noted that demand recovery at LGW has been slower than elsewhere in the UK. The recovery of the market by 2024/5 is agreed but not necessarily LGW's share of the market.</p>
Demand growth	<input type="checkbox"/> Growth in demand for aviation is set to continue in the long term, albeit with lower growth rates than demonstrated in the last 20 years The JZ forecasts from 2022 aligned with GAL's top down projections prepared in 2020. This equates to approx. +70% growth from 2018 and provides an appropriate macro forecast for the sector.	<p>It is agreed that the JZ demand forecasts at the overall UK level remain similar to those adopted by DfT in 2017. However, more recent demand forecasts accompanying the SAF Mandate consultation <a href="https://www.gov.uk/government/consultations/pathway-to-net-zero-aviation-developing-the-uk-sustainable-aviation-fuel-mandate">https://www.gov.uk/government/consultations/pathway-to-net-zero-aviation-developing-the-uk-sustainable-aviation-fuel-mandate</a>.</p>
LON Growth	<input type="checkbox"/> The growth under JZ is considered a reasonable basis for London growth rates (for example, catchment population of London is in line with UK, also LON benefits from greater inbound demand potential) than elsewhere.	<p>It does not follow that growth in the London airport's share of the overall travel market will necessarily grow at the same rate as the overall national air passenger demand growth rate. Account needs to be taken of the greater role of regional airports meeting that demand and also of hub traffic at Heathrow that would be lost if Heathrow does not expand.</p>
LON Growth	<input type="checkbox"/> By 2030, 25% (JZ'22) growth is forecast across the London airports (in line with JZ UK projection versus a 2018 baseline) <input type="checkbox"/> This is equivalent to an extra 45 mppa (+25%) in 2030.	<p>This is not correct if Heathrow does not expand a large proportion of the growth in hub traffic assumed within the JZ overall demand forecasts would be lost. It is not agreed that demand to use the London airports will grow by 45 mppa in 2030 absent the increase in runway capacity at Heathrow assumed by the DfT in the JZ scenarios.</p>
<b>6 Demand vs Capacity</b>		
LON	<p>With only limited growth prospects available across the London airports, demand will exceed total terminal capacity constraints. Even if the London airports are able to fully maximise their planning or terminal capacity, demand would outstrip supply</p> <input type="checkbox"/> In 2030 total airport capacity is estimated at <215m passengers. <input type="checkbox"/> Demand will pass these levels based on JZ projections <input type="checkbox"/> By 2035 demand in London will exceed 245m (JZ'22) <input type="checkbox"/> Further growth is anticipated beyond that date.	<p>These overall figures for the London market are not agreed without detailed assessment of the extent to which these demand levels would arise without the specific capacity assumptions adopted by the DfT in the Jet Zero modelling.</p> <p>Dependent on the consents granted at the other airports in the intervening period, it cannot be assumed that the overall capacity available across the London airports will necessarily be &lt;215 mppa.</p>

	<p>LGW's LON positioning</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> LGW is favoured by many airlines today (e.g. focus of growth ambitions for many carriers)</li> <li><input type="checkbox"/> Gatwick is the only airport after LHR where an established secondary market exists for slots</li> <li><input type="checkbox"/> Gatwick has historically been prioritised by airlines for growth over other LON airports</li> <li><input type="checkbox"/> Gatwick is the only non LHR airport to serve sizeable, long haul demand</li> </ul>	<p>If this was the case, the market would see Gatwick recovering from the effects of the pandemic faster than the other London airports. This is not the case, with passenger throughput in the 12 months to April 2023 running at 86% of 2019 volumes compared to:</p> <ul style="list-style-type: none"> <li>Heathrow – 94%</li> <li>Stansted – 98%</li> <li>Luton – 90%</li> <li>Manchester – 91%</li> <li>Edinburgh – 95%</li> <li>Bristol – 114%</li> </ul>
7	<p><b>LGW NRP</b></p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> LGW will grow into the incremental capacity. A release profile of 3 years has been assumed but, even if it takes slightly longer to fill, the NRP will still fill</li> <li><input type="checkbox"/> The NRP growth (13mppa) is a notable but relatively modest increase in the context of a 200+mppa airport system</li> <li><input type="checkbox"/> LGW has delivered strong growth historically, even without new runways. For example, &gt;10mppa growth was delivered in 2013-19 period.</li> <li><input type="checkbox"/> Repeating this with a new runway in a more constrained market is not remarkable given the levels of market demand growth forecast, LGW's ability to serve out and inbound demand across a large catchment, and Gatwick's ability to provide capacity of a suitable nature and price for its wide range of users.</li> </ul>	<p>Not agreed. This has not been demonstrated by GAL in the absence of robustly grounded forecasts based on a detailed assessment of competitive interactions in the market.</p> <p>Recent growth in passenger volumes has been attained largely through a shift in airlines towards low fare airlines with higher average aircraft load factors. It cannot be related directly to the effect of constraints in the market or otherwise.</p>

Tracker 3: Capacity and Operations (based on the draft SoCG)

Ref	Subject	GAL Position	GAL Position - Supporting Tables	Local Authority Position																																																																															
1	Airfield capacity	The approach taken by GAL in determining the Busy Day levels of demand which can be accommodated on the runway in future years is the same as used for annual capacity declaration with the support of the GAL Coordination Committee and is a sound basis for assessing future capacity.	n/a	The capacity declaration process relies hourly and 15 minute capacity declarations and hourly/rolling hourly/2 hourly terminal capacities. It is not clear how this relates to the process of assessing busy day levels of demand, which would normally derive from an assessment of overall market demand rather than being the basis of deriving that assessment of demand in the first instance.																																																																															
2	Airfield capacity	<p>*This approach may be summarised as follows:</p> <ol style="list-style-type: none"> <li>1.A peak day schedule (August Friday) is used to model runway holding times based on forecasted demand, as detailed in the forecasting section.</li> <li>2.Performance parameters modelled are reflective of non-disrupted busy periods of operation.</li> <li>3.Sequencing is optimised so as to maximise throughput while avoiding excessive holding for individual aircraft.</li> <li>4.Average sustained levels of holding are kept below 10 mins and below 15 minutes in any individual hour. This restricts the amount of pipeline demand which can be added each year.</li> <li>5.Terminal and apron requirements are determined in order to support the forecasted Busy Day demand.</li> </ol> <p>*It is important to note that in using peak day demand we can expect other days to experience better levels of service when operating in conditions of good visibility without disruption.</p>	n/a	The process is noted but the robustness of the outputs is dependent on the assumptions adopted (see below).																																																																															
3	Airfield capacity	<p>*The Busy Hour capacity assumed in the Baseline is unchanged from Gatwick's currently declared 55 movements/hour. This can be delivered in hours when there is an even balance of arrivals and departures or when excess departures are sequenced on alternate SIDs. Gatwick has historically achieved throughputs of 55 or more per hour, which is achieved with average Arrival-Departure-Arrival (ADA) separations of 130secs.</p> <p>*The Busy Hour Capacity assumed with dual runway operations (DRO) is 70 movements per hour, although maximum number of movements scheduled in a static hour is 69. The expected maximum capacity is 80 movements per hour with an even balance of medium sized arrivals and departures in an ADA sequence. With medium sized arrivals being handled on the main runway and departures on the northern runway, arrivals are spaced at 90s separation and departures may commence roll as soon as the preceding arrival has touched down, the arrival then vacates the main runway and crosses the northern runway after the departure on the northern runway has passed by. The following arrival can then land on the main runway.</p> <p>*This capability is more sensitive to mix than with single runway operations as an imbalance in arrivals and departures will not allow best use of the northern runway and wide body departure aircraft are assumed to still use the main runway, again not making best use of the northern runway. As such a realistically achievable throughput in peak hours is about 70 movements per hour. The departures only capacity and arrivals only capacity is unchanged in dual operations.</p>	n/a	<p>The current hourly declared capacity of the single runway is noted. It is noted that this is achieved principally in hours where there is an even balance of arrivals and departure.</p> <p>It is unclear whether the levels of delay to aircraft remain within acceptable levels in hours when more than 55 movements are scheduled.</p> <p>It is not agreed that GAL's modelling has validated the achievability of 69 or 70 movements per hour with dual runway operations at acceptable levels of delay (see below). Specifically, the peak hourly departure rate of runway movements is not agreed as being achievable.</p>																																																																															
4	Airfield capacity	The Busy Day capacity can generate more than 60k annual ATMs, or 13 mppa in addition to the baseline case.	n/a	Not agreed due to uncertainty in the uplift in hourly capacity deliverable, particularly for based overnighting aircraft in the peak morning departure period and also in the assumptions underpinning seasonality of traffic.																																																																															
5	Airfield capacity	<p>Modelled holding times using AirTOP fast time simulation:</p> <p>[see table in Column E]</p> <p>The modelling simulates the ground and runway movements from stand to airborne and vice versa. The modelling results demonstrate acceptable levels of airfield performance, as average runway holding times are not sustained above 10 minutes and do not reach over 15 minutes, which are the current agreed parameters for the declaration process. Average departure taxi times, which include runway and taxiway holding, are also below 20 minutes.</p> <p>The fast time simulations abide by 2010 separation performance parameters, although same direction SID DD separation requirements are not considered due to the model not efficiently sequencing both runway selection and SID balancing. This is a reasonable assumption given that the planned schedule has an acceptable balance between arrivals and departures in hours with significant SID directional bias allowing DDs in the same direction to be minimised through optimised sequencing, as with the current operation.</p>	<table border="1"> <thead> <tr> <th rowspan="2">Measure Category</th> <th colspan="4">2029</th> <th colspan="4">2038</th> </tr> <tr> <th>0800-1000 1000-1200</th> <th>1200-1400</th> <th>1600-1800</th> <th>1800-2000</th> <th>0800-1000</th> <th>1000-1200</th> <th>1600-1800</th> <th>1800-2000</th> </tr> </thead> <tbody> <tr> <td>Avg. Departure (min)</td> <td>13.7</td> <td>12.4</td> <td>12.8</td> <td>12.9</td> <td>17.9</td> <td>16.9</td> <td>16.0</td> <td>16.0</td> </tr> <tr> <td>Avg. Arrival (min)</td> <td>9.8</td> <td>8.8</td> <td>9.0</td> <td>9.0</td> <td>10.8</td> <td>9.4</td> <td>9.4</td> <td>9.4</td> </tr> <tr> <td>Holdings (min)</td> <td>1.4</td> <td>1.2</td> <td>1.3</td> <td>1.2</td> <td>2.0</td> <td>1.2</td> <td>1.5</td> <td>1.4</td> </tr> <tr> <td>Taxiway (min)</td> <td>0.5</td> <td>0.4</td> <td>0.5</td> <td>0.5</td> <td>0.6</td> <td>0.5</td> <td>0.6</td> <td>0.6</td> </tr> <tr> <td>Runway (min)</td> <td>4.0</td> <td>2.8</td> <td>3.1</td> <td>3.1</td> <td>6.2</td> <td>7.1</td> <td>6.2</td> <td>6.0</td> </tr> <tr> <td>Avg. Taxiway (min)</td> <td>0.9</td> <td>0.4</td> <td>0.5</td> <td>0.5</td> <td>1.3</td> <td>0.7</td> <td>0.7</td> <td>0.7</td> </tr> <tr> <td>Avg. Holding (min)</td> <td>3.2</td> <td>3.0</td> <td>3.2</td> <td>3.0</td> <td>4.0</td> <td>3.9</td> <td>3.9</td> <td>3.7</td> </tr> </tbody> </table> <p>These results are not agreed as valid due to the underpinning assumption that 60 seconds departure-departure separations will be achievable between all departing aircraft regardless of departure route. This simplifying assumption results in the delays for sequencing of aircraft to achieve this average separation being understated meaning that, if properly modelled, the average delays in peak periods would exceed the level of 10 minutes on average at the peak that is normally considered as the maximum acceptable to the airlines.</p> <p>It is not agreed that the modelling demonstrates acceptable levels of airfield performance when the requirements to optimise the sequence of departing aircraft to achieve the claimed runway movement rate are fully taken into account. The achievability of the peak morning departure rate is considered more critical to determining the effective capacity of the Airport overall having regard to the future mix of passenger traffic claimed by GAL with 83% of aircraft movements in 2038 with the NRP expected to be domestic and short haul operations.</p> <p>Reference is made to the 'planned schedule' but no justification is provided as to whether the assumptions underpinning this planned schedule are robust.</p>	Measure Category	2029				2038				0800-1000 1000-1200	1200-1400	1600-1800	1800-2000	0800-1000	1000-1200	1600-1800	1800-2000	Avg. Departure (min)	13.7	12.4	12.8	12.9	17.9	16.9	16.0	16.0	Avg. Arrival (min)	9.8	8.8	9.0	9.0	10.8	9.4	9.4	9.4	Holdings (min)	1.4	1.2	1.3	1.2	2.0	1.2	1.5	1.4	Taxiway (min)	0.5	0.4	0.5	0.5	0.6	0.5	0.6	0.6	Runway (min)	4.0	2.8	3.1	3.1	6.2	7.1	6.2	6.0	Avg. Taxiway (min)	0.9	0.4	0.5	0.5	1.3	0.7	0.7	0.7	Avg. Holding (min)	3.2	3.0	3.2	3.0	4.0	3.9	3.9	3.7
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6	Airspace Change	The project requires a lateral shift of the northern runway centreline by 12 metres. The airspace design to support the operation would be the same as it is today, meaning pilots would fly existing procedures, and the same flight paths over the ground. The dual runway operations would require only minor modifications to the airspace related aspects of the airport's Aeronautical Information Publication (AIP) entry. GAL initiated an airspace change process, overseen by the CAA and in line with CAP1616 requirements. The CAA has reviewed GAL's proposals and categorised the Gatwick Airport Northern Runway Project Airspace Change Proposal as a Level 0 in its decision published as CAP 1908. Level 0 proposals are changes that do not alter air traffic patterns.	n/a	Noted.																																																																															
7	Airspace capacity	<p>*The CAA has already set out in its decision that an airspace change is not necessary to facilitate Gatwick's Northern Runway Project.</p> <p>*The airspace around Gatwick, including the current design of the Standard Instrument Departures (SIDs) and the route structure of the London Terminal Manoeuvring Area Airspace (LTMA) is sufficient to accommodate dual runway operations at Gatwick.</p> <p>*The Future Airspace Strategy - South (FASI-S) programme may be delivered in a similar timeframe but is not necessary to enable Gatwick's Northern Runway Project.</p> <p>*FASI-S is anticipated to deliver network improvements that will directly benefit Gatwick in terms of safety, capacity, efficiency and in reducing environmental impacts. The scale and nature of those benefits will only be clear once the FASI-S airspace change process has been completed. The timing and progress of this programme is outside of the control of Gatwick Airport Limited.</p> <p>*As part of an obligation to provide 'Core Services' under its licence, NATS delivers a London Approach Service that is capable of meeting on a continuing basis any reasonable level of overall demand for such services; this includes services provided to an aircraft on its final approach or initial departure to/from Gatwick.</p> <p>*NATS has existing measures in place to manage the flow of traffic in the London Terminal Manoeuvring Area (LTMA) efficiently and to ensure the sector/airspace loading remains within safe operational parameters.</p>	n/a	It is noted that NATS currently has measures in place, such as flow control, to ensure that demand from aircraft can be safely managed in the London TMA. Whilst there it is accepted that there is no requirement to alter the departure and arrival routes in the immediate vicinity of the airport to accommodate the NRP, it is understood that the improvements to airspace more generally through the FASI-S programme will be required in order to ensure sufficient capacity in the LTMA to accommodate the anticipated growth in aircraft movements at Gatwick and the other London airports.																																																																															

8	SID Splits	<p>*In 2020, sequencing of departures will be optimised such that sequencing successive departures in a departure-departure (DD) sequence can generally be avoided or separated by an arriving aircraft, just like in the existing operation. Further enhanced procedures are not necessary for the NRP forecast but would add resilience, so are planned whether the NRP goes ahead or not.</p> <p>*These projects have a positive but small effect over the baseline scenario as an arrival between departures on a single runway creates a gap that allows almost any DD pair to depart without impacting the flow of arrivals. In a dual runway system, projects to reduce the impact of aircraft departing in similar direction by adding tool support will help controllers standardise performance.</p> <p>*Work to reduce the impact of wake vortex separation requirements by adopting a standard already in use at Heathrow, will reduce sequencing complexity and improve resilience. Resulting holding times will therefore be resilient against unusual SID balances caused by any off-schedule activity, restrictions in departure airspace, or variation between the forecast and actual schedule.</p> <p>*These projects, combined with other planned reductions in DD separations noted in Appendix 1, will enable GAL to reduce average DD separations for medium wake category from 70s currently to 60s.</p>	n/a	<p>GAL's intention to adopt sequencing techniques to optimise departures with the NRP with a view to reducing departure-departure separations in peak periods is noted. However, the modelling of the capacity of the NRP has not taken the effects of this sequencing into account and, consequently, delays are understated and capacity overstated in the critical hours for departures.</p> <p>It is considered that limited reliance can be placed on improved air traffic control techniques to reduce departure-departure separations and that capacity should be assessed in the first instance based on current processes and achieved separations.</p>																									
9	SID Splits (annual & Lec)	<p>*SID usage forecasts were developed using the following methodology:</p> <p>1.Apply historical 2018 baseline SID split based on market being flown (e.g. Asia, North America, Europe, etc.). Aircraft flying westward in 26 runway direction, predominantly take the straight on SIDs. Aircraft flying eastwards take the SIDs turning north, then east shortly after take off (Route 4). WIZAD SID serves the same destination as Route 4 SIDs and is exclusively used tactically in event of disruption to Route 4 operations, e.g. due to weather. This arrangement is sufficient to support all the current and future capacity forecasts.</p> <p>2.The future WIZAD SID usage is 'carved' out of ADM, FRA, and LAM, but only for narrow body aircraft between 0700-2300 local. This was assumed not to increase airfield capacity but rather in anticipation of increased disruption to the north of Gatwick due to expected increase in airspace usage across the London Terminal Manoeuvring Area. In those circumstances, to avoid access delay air traffic control would divert traffic southwards.</p>	n/a	Noted.																									
10	SID Splits (Busy Day)	<p>*Gatwick's SID structure has been fully taken into account in its capacity and forecasting assumptions.</p> <p>*The busy day SID splits are based on Summer 2018 actual SID usage. Summer 2018 data is analysed to determine the typical departure SIDs used by aircraft serving each geographical region. This same regional SID usage is applied to the forecast schedule based on the region the aircraft is flying to.</p> <p>*On the modelled Busy Day, there is a Westerly SID bias of 55% West to 45% East in the early morning peak period 0500-0800 UTC. The current SID bias is greater in the hours where the arrivals and departures are more evenly balanced and the requirement to sequence DD is reduced as an arrival may then be sequenced between successive departures on the same SID route.</p> <p>*The following table shows the balance of arrivals and departures and departure SID bias in the first 4 hours of the day 0500 – 0800 UTC.</p> <p>[see table in Column E]</p> <p>*Note that for the first 2 hours of the day there is very little SID bias and in the 0700 hour the SID bias is not an issue as there is an even balance of arrivals and departures. In the 0800 hour arrivals would need to be sequenced between 20% same route departures for optimal sequencing, however as 32% of movements are arrivals, this is manageable. Allowance is made with significantly reduced demand in the 0800 hour.</p>	<table border="1"> <thead> <tr> <th>Hour UTC</th> <th>% departures</th> <th>% Westerly SID</th> <th>hourly demand</th> <th>comment</th> </tr> </thead> <tbody> <tr> <td>5</td> <td>79%</td> <td>52%</td> <td>61</td> <td>Balanced SIDs</td> </tr> <tr> <td>6</td> <td>62%</td> <td>49%</td> <td>63</td> <td>Balanced SIDs</td> </tr> <tr> <td>7</td> <td>52%</td> <td>66%</td> <td>69</td> <td>Balanced Arrivals / Departures</td> </tr> <tr> <td>8</td> <td>48%</td> <td>60%</td> <td>59</td> <td>Imbalance - increased demand</td> </tr> </tbody> </table>	Hour UTC	% departures	% Westerly SID	hourly demand	comment	5	79%	52%	61	Balanced SIDs	6	62%	49%	63	Balanced SIDs	7	52%	66%	69	Balanced Arrivals / Departures	8	48%	60%	59	Imbalance - increased demand	<p>It is not accepted that Gatwick's SID structure has been fully taken into account in its capacity modelling and demand forecasting as no account has been taken of the need to sequence aircraft on the ground to optimise the distribution of aircraft by SID. As a consequence, the capacity modelling understates delay and overstates departure capacity.</p>
Hour UTC	% departures	% Westerly SID	hourly demand	comment																									
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11	Holding between runways	<p>*It is anticipated that 90-95% of landing aircraft (all Codes) will land and cross the northern runway without needing to hold between the runways. Runway exits are positioned in the final third of the runway, allowing ample time for the departure on the northern runway to rotate and vacate the runway.</p> <p>*The boundary of an instrumented runway is considered to be the runway holding position or 90m from the runway centreline. However as per today's operation and in line with EASA CS-ADR_DSN.B.165, 77.5m from runway centreline will be considered as the point where aircraft have fully vacated the runway before landing or take-off clearance is issued to the next movement. This is with the proviso that the vacating aircraft's tail is at or beyond 77.5m and it continues to move forward without stopping.</p> <p>*Standard stop bar arrangements would not be appropriate to accommodate the largest Code C aircraft when and if they need to stop between the runways. Gatwick is therefore proposing offset stop bars with related airfield signage which would enable pilots to position different types of Code C aircraft clear of both runway strips.</p> <p>*These may be reinforced with other measures such as autonomous runway incursion warning system which would ensure separation between aircraft crossing the live runway and the arrivals or departures.</p> <p>*These arrangements are safe and effective.</p>	n/a	<p>GAL's position is noted. The acceptability of these proposals is subject to confirmation by the Civil Aviation Authority.</p>																									
12	End around taxiways	<p>*The end around taxiways (EATs) have not been designed to be independent. They are within the runway safety zones.</p> <p>*Aircraft using them would require clearance to cross the ends of the runways.</p> <p>*It is anticipated that 90-95% of landing aircraft (all Codes) will land and cross the northern runway – without needing to hold between the runways – 'Land and Cross Behind'.</p> <p>*Gatwick anticipates that &lt;5% of wide body aircraft would need to utilise either the EAT or taxi to the end of runway.</p> <p>*All of the points above have been factored into calculations for runway capacity.</p>	n/a	<p>GAL's position is noted. The acceptability of these proposals is subject to confirmation by the Civil Aviation Authority.</p>																									
13	Juliet Taxiway Multi coding	<p>*The proposed arrangement is not dissimilar from the current multi code taxiway arrangements of Juliet (which is configured for Code 'C' aircraft between Whiskey and November and Code 'F' from November westward).</p> <p>*The taxiway will have clear standard signage designating the taxiway codes, and relevant directional guidance will be provided by the Air Traffic Ground Controller.</p> <p>*Stop bars will be installed at appropriate points to clearly notify and prevent aircraft from using the wrong taxiway.</p> <p>*The proposed configuration has been reviewed by the CAA and no safety concerns have been raised.</p>	n/a	<p>GAL's position is noted. The acceptability of these proposals is subject to confirmation by the Civil Aviation Authority.</p>																									
14	Passenger service and efficiency of airfield configuration	<p>Through NRP the airfield layout is improved through the follow developments:</p> <p>*The additional runway capability results in material reductions in departures holding times in 2038 compared to 2018.</p> <p>*Lima extension provides dual taxi routings between Uniform and Lima providing additional resilience.</p> <p>*Charlie Box provides an additional holding area accessible from multiple directions on the airfield and keeps departures away from the arrival taxi routes. The capacity of Charlie Box helps to optimise sequencing and builds in enhanced resilience.</p> <p>*Juliet bypass maintains sequencing capability for Easterly operations.</p> <p>*Additional Pier (Pier 7) located on westerly side of the core airfield, away from traffic from other central piers providing additional pier served capacity in an efficient location for traffic flow.</p> <p>*The layout of the airfield is operationally efficient and performs better overall than the current airfield layout.</p>	n/a	<p>It is not accepted that the NRP layout will reduce departures holding when the need to sequence aircraft is properly taken into account.</p> <p>The acceptability of the airfield configuration is subject to confirmation by the Civil Aviation Authority.</p>																									
15	Passenger service / Pier 7	<p>*The process of selecting the location for additional Pier served capacity considered a range of options and Pier 7 was deemed the most efficient with regard to airfield flow.</p> <p>*Automated Vehicle technology is developing rapidly. Given the developments to date and ongoing initiatives it is reasonable to assume that full size autonomous buses capable of carrying c-40 passengers will be available for operational use by the end of the decade. Based on that assumption:</p> <p>oJourney times from North and South Terminals to Pier 7 are estimated at 3.5 minutes and 6 minutes, with a round trip taking 15 mins and 18 mins respectively (allowing for loading and unloading of passengers). The journey times are lower than walking times to certain pier served stands.</p> <p>oAt peak times (assuming 6-8 aircraft departures per hour from Pier 7, requiring transport of 1,200 – 1,600 passengers) an AV would be required to depart every 3 - 4 minutes from each terminal, providing frequent opportunities for passengers to reach the pier.</p>	n/a	<p>GAL's position is noted. It is accepted that these are matters that can be determined at the detailed design stage and would need to be confirmed as acceptable by the airlines.</p>																									

16	Apron Stand capacity	<p>*Gatwick Airport Limited (GAL) operates under a set of 'Commitments', a legally binding contractual undertaking between GAL and its airline customers. This is underpinned by an economic licence granted by the UK Civil Aviation Authority (CAA) under the Civil Aviation Act 2012.</p> <p>*One of the core commitments is delivering an agreed Pier service level (PSL). The planned number of pier served stands on Pier 7 and those being delivered through the Pier 6 extension are sufficient to deliver the required PSL commitment.</p> <p>*Given the levels of current and forecast traffic at Gatwick, it is appropriate that the northern runway is brought into operation, as proposed, in order to add resilience to the operation of the airport.</p>	n/a	This is a matter for GAL, the CAA and the airlines.
17	Two operational runways.		n/a	The ability of the NRP to improve the resilience of the airfield at current traffic levels is accepted.

**Justification for Assumed 60S DD Separation by 2029**

Ref	Operational Procedure	2019	Optimal*	2029	Justification
18	Same route DD separation time	106 sec	85 sec	88 sec	Improved delivery of ATC procedures is expected to deliver median same route DD separations of between 85s and 90s. Tool support to achieve this is being introduced in Q3 2023.
19	Alternate route DD separation time	60 sec	55 sec	57 sec	Improved delivery of ATC procedures is expected to deliver median alternate route DD separations of between 56s and 58s through continuous improvement.
20	% same route DD separation	20%	0%	10%	Essentially, each same route DD separation is a sequencing failure. There are various mechanisms by which the percentage of same route DD separations can be reduced: - ACDM and pre-departure sequencer software will help the controller achieve optimal sequencing. Large-scale trials in Q2 2023 demonstrated pre-departure sequencer works well, integrates with controller workflows, and controller feedback was positive. Expecting to integrate into standard practice during 2024.  - Better utilisation of SID offload route to be encouraged at peak times - Improved scheduling to reduce bunching of same route departures.
21	Average DD separation time	70 sec	55 sec	60 sec	

\* In the above table, "Optimal" refers to the maximum theoretical potential using current processes and procedures.

Tracker 4: Issues from AoC response - July 2023

No.	LAs Comments	GAL Response	Signposting to DCO Application
<b>Overarching Documentation</b>			
-	No additional items	n/a	n/a
<b>Aviation Capacity and Forecasting, and Socio-Economics</b>			
1	Criticisms were made in November 2022 of the basis of the socio-economic impact assessment, particularly in relation to its reliance on Gatwick being the only airport to increase its capacity over the period of its plans, an overstatement of the fare and user benefits arising from the NRP that underpinned the economic appraisal. Criticisms were also made of the robustness of the methodology used to assess the wider economic benefits deriving from the connectivity offered by growth at Gatwick, in particular the failure to use available data on how UK airports are used and the origins of passenger demand. The Authorities were promised further explanation of the methodology in January 2023, and it was understood that the Applicant would be revising its modelling to take the criticisms into account. To date no further information has been provided and, as a consequence, the economic case cannot be considered robust.	<p>The detailed information provided in ES Appendix 4.3.1: Forecast Data Book (FDB) demonstrates that these issues have been noted and addressed. They have also been discussed at length in the Technical Working Group meetings and continue to be the subject of engagement through the SoCG process. Plans for other airport expansion are directly addressed in the FDB at sections 3 and 7 - and sensitivity tests set out in Annexes 4 and 5. The origin of passenger demand is directly addressed in section 5 and in the 'Pipeline report' provided at Annex 6.</p> <p>Please also refer to the GAL response to those issues identified under the 'Socio-Economic / Economic - Detailed Information Requested' section in the related March 2023 issues tracker.</p>	ES Appendix 4.3.1: Forecast Data Book (Doc Ref. 5.3) [APP-075]
<b>Air Quality</b>			
-	No additional items	n/a	n/a
<b>Air Noise</b>			
2	Annual and summer contours should be provided to monitor growth outside the summer period (as requested by PINS)	<p>A response is provided in Table 14.3.1 of ES Chapter 14: Noise and Vibration in that Diagram 4.5.1 of the Scoping Report related to growth in air traffic without the Project and indicated clearly that the highest numbers of flights would continue to occur in the months of June to September (20% above winter months) as captured by the Leq noise modelling period from 16 June to 15 September. This is confirmed by current forecasts.</p> <p>Annual Lden and Lnight contours are provided for baseline and with Project conditions in Section 14.6 and 14.9 of ES Chapter 14 to illustrate noise changes over the whole year including the winter months.</p>	ES Chapter 14: Noise and Vibration (Doc Ref. 5.1) [APP-039], ES Appendix 6.2.1: Scoping Report (Doc Ref. 5.3) [APP-092 and APP-093] and ES Chapter 4: Existing Site and Operation (Doc Ref. 5.1) [APP-029]
<b>Landscape and Visual Impact / Heritage</b>			
3	Information regarding the Zone of Theoretical Visibility for construction compounds (due to the length of time they will be in place).	The Zones of Theoretical Visibility (ZTV) are contained in Figures 8.4.1 and 8.4.2 of the ES Landscape, Townscape and Visual Resources Figures. The ZTV are based on the Project's maximum design parameters, including the CARE stack at 48 metres, to provide the worst case assessment for EIA purposes.	ES Landscape, Townscape and Visual Resources Figures (Doc Ref. 5.2) [APP-060 to APP-062]
4	Further information and details in respect of proposals on visually sensitive sites such as car park C and Pentagon Field.	ES Chapter 5: Project Description provides a detailed explanation of the Project proposals, and should be read alongside the ES Project Description Figures.	ES Chapter 5: Project Description (Doc Ref. 5.1) [APP-030] and ES Project Description Figures (Doc Ref. 5.2) [APP-053]
5	Request made for ZTV information on heritage assets.	Figures 7.6.3 and 7.6.4 of ES Historic Environment Figures identify the designated heritage assets within 3km of the Project site boundary and within the Zone of Theoretical Visibility.	ES Historic Environment Figures (Doc Ref. 5.2) [APP-054]
6	Information regarding the demolition, construction and operation of the proposed CARE facility.	The Project proposals for the Central Area Recycling Enclosure facilities are described in paragraphs 5.2.50 to 5.2.53 of ES Chapter 5: Project Description. Further detail on the demolition of the existing CARE facility and construction of the proposed CARE facility are contained in Section 8.6 of ES Appendix 5.3.1: Buildability Report - Part 1.	ES Chapter 5: Project Description (Doc Ref. 5.1) [APP-030] and ES Appendix 5.3.1: Buildability Report - Part 1 (Doc Ref. 5.3) [APP-079]

Biodiversity and Arboriculture			
7	Tree survey data.	Annex 4 of the Outline Landscape and Ecology Management Plan (oLEMP) contains preliminary Tree Removal and Protection Plans for the surface access proposals, within Parts 3 and 4 of the oLEMP. Further tree survey work is ongoing across the other areas affected by the Project and will be shared with the LAs when complete.	Outline Landscape and Ecology Management Plan (Doc Ref. 5.3) [APP-115 and APP-116]
8	Terms of Reference for the Bio-diversity Sub Group.	GAL would propose to discuss appropriate Terms of Reference with the LAs as part of the SoCG discussions on this topic.	n/a
9	Draft Outline Landscaping proposals.	<p>Illustrative landscape proposals are set out in ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan (oLEMP) and is available to view on PINS website. Annex 4 of the oLEMP contains preliminary Tree Removal and Protection Plans for the surface access proposals, contained within Parts 3 and 4 of the oLEMP. In addition to this, Figures 1.2.1 to 1.2.15 of the oLEMP Part 1 contains illustrative landscape planting proposals for the surface access improvements at South Terminal roundabout, North Terminal roundabout and Longbridge roundabout, in addition to landscaping proposals for Museum Field and Car Park B.</p> <p>Additional supporting imagery of the landscaping proposals for the surface access proposals, including the relationship to the existing trees, is also contained in the Design and Access Statement Volume 3 (Section 5.2 on the Surface Access Corridor zone)</p>	ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan (Doc Ref. 5.3) [APP-113 to APP-116] and Design and Access Statement Volume 3 (Doc Ref. 7.3) [APP-255]
10	Engagement on Biodiversity Net Gain (BNG) Strategy.	<p>The Biodiversity Net Gain Statement is contained in ES Appendix 9.9.2 of the DCO Application and is available to view on PINS website.</p> <p>The BNG strategy for the Project was discussed through the Biodiversity TWG sub-group, with meetings held on 8th November 2022 and 14th December 2022.</p>	ES Appendix 9.9.2: Biodiversity Net Gain Statement (Doc Ref. 5.3) [APP-136]
11	Habitat enhancement plans, including Bechstein's bats.	<p>The Project proposals for landscape and ecological planting proposals are described in paragraphs 5.2.146 to 5.2.149 of ES Chapter 5: Project Description. This includes proposals for the creation and enhancement of habitats, including woodland, tree, scrub, shrub, wetland, amenity and grassland. The areas for environmental mitigation are shown on Figure 5.2.1f of the ES Project Description figures.</p> <p>Further detail on the ecology strategy and ecology mitigation measures is contained in Sections 6 and 7 of ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan. In particular, Section 7 outlines the ecological mitigation measures to specific to each relevant species.</p>	ES Chapter 5: Project Description (Doc Ref. 5.1) [APP-030], ES Project Description figures (Doc Ref. 5.2) [APP-053] and ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan (Doc Ref. 5.1) [APP-114 to APP-116]
12	Information regarding the key relationship between drainage works / strategy and impacts on ecology.	ES Chapter 9: Ecology and Nature Conservation undertakes an ecological assessment taking account of the drainage proposals forming part of the Project, as well as the potential impacts to ecology from changes in watercourse flows and drainage systems during the construction and operation of the Project (as per the assessment contained in ES Chapter 11: Water Environment.	ES Chapter 9: Ecology and Nature Conservation (Doc Ref. 5.1) [APP-034] and ES Chapter 11: Water Environment (Doc Ref. 5.1) [APP-036]
Water			
13	More evidence behind the drainage strategy work, noting the Applicant responded to TWG on 3 May 2022 that the concept designs would be shared within weeks. At a later meeting in October 22 the Applicant promised a 'presentation on highway drainage but would not share final data until pre-submission;	<p>Requirements 10 and 11 of Schedule 2 to the draft DCO provide that no part of the authorised development (save for the identified exceptions) are to commence until written details of the surface and foul water drainage for that part, including means of pollution control and monitoring, have been submitted to and approved in writing by the named relevant authority. Such drainage details submitted for approval are to be in general accordance with the drainage design principles included in Appendix 1 to the Design and Access Statement.</p> <p>Specifically on the highway works, the design principle as stated in the DAS (and secured by Requirement 11 of the dDCO) states that "The drainage design for the highways works should comply will the principles set out in the ES Appendix 11.9.6 Flood Risk Assessment -</p>	ES Chapter 11: Water Environment (Doc Ref. 5.1) [APP-036], Design and Access Statement Volume 5 (Doc Ref. 7.3) [APP-257], draft Development Consent Order (Doc Ref. 2.1) [APP-006] and ES Appendix 11.9.6: Flood Risk Assessment - Annex 2: Surface Access Drainage Strategy (Doc Ref. 5.3) [APP-148]

Major Accidents and Disasters			
14	Information regarding potential effects upon emergency response times for vehicles attending the airport.	Section 18.5 of ES Chapter 18: Health and Wellbeing provides an assessment of the Project on emergency response times against each assessment year.	ES Chapter 18: Health and Wellbeing (Doc Ref. 5.1) [APP-043]
Climate Change and Carbon Emissions			
15	Sustainability Assessment	Figures 7.6.3 and 7.6.4 of ES Historic Environment Figures identify the designated heritage assets within 3km of the Project site boundary and within the Zone of Theoretical Visibility.	Planning Statement Appendix D: Sustainability Statement (Doc Ref. 7.1) [APP-249]
Socio-Economic / Economic			
-	No additional items	n/a	n/a
Transport and Highways (Surface Access and Active Travel)			
-	No additional items	n/a	n/a
Other Matters			
16	Request for explanation as to why boundary changes have been made to the DCO application.	An explanation of the changes to the Project site boundary is contained in paragraph 5.2.4 of ES Chapter 5: Project Description.	ES Chapter 5: Project Description (Doc Ref. 5.1) [APP-030]
17	Engagement to discuss governance issues and further discussion on possible thresholds and community funds (raised Nov 22).	Draft terms of reference and membership for a strategic oversight group were provided by GAL on 27th July 2023, aimed at resolving post-application acceptance matters and including matters relating to the DCO Requirements and s106 obligations. GAL would welcome the LAs view on how it envisages discussions and negotiations taking place between GAL and LAs on the s106 Agreement now that the application has been accepted for Examination.  Specifically on the community fund, Table 17.2.1 of ES Chapter 17: Socio-Economics explains the proposed approach to the new Gatwick Community Fund, proposed to be secured under the new Section 106 Agreement	ES Chapter 17: Socio-Economics (Doc Ref. 5.1) [APP-042]
18	Evidence supporting conclusions on the need for (and operation of) the waste/CARE facility, including demolition of the existing facility.	The Project proposals for the Central Area Recycling Enclosure facilities are set out in paragraphs 5.2.50 to 5.2.53 of ES Chapter 5: Project Description.	ES Chapter 5: Project Description (Doc Ref. 5.1) [APP-030]



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**Annex A2: Letter from the JLAs 4 September 2023**

## Economy and Planning

Contact name: Clem Smith

Email: [REDACTED]

Date: 4 September 2023

Direct line: 01293 438567



Jonathan Deegan  
DCO Project Lead  
Gatwick Airport Ltd (GAL)  
Destinations Place, South Terminal  
London RH6 0NP

Dear Jonathan

### **Gatwick Airport Northern Runway DCO - NRP Local Authority Issues Tracker**

Thank you for your letter of 18 August 2023 presenting a series of draft Issues Trackers for Local Authority review.

My apologies that I have been unable to write back to you sooner with our response, due to a number of key officers from across the Gatwick Officers Steering Group having been off for periods of annual leave over the past few weeks, including myself. Representatives of all ten Authorities held a Steering Group via MS Teams this morning to discuss your letter and we are therefore responding to you as quickly as possible following that discussion with our initial response, focused on your suggested timeline for progressing the Trackers and on the format of the draft issues trackers which you have produced and their status going forward.

Starting with their status, it is noted that PINS state in its S51 letter of 3 August 2023 that "This [issues tracker] should be kept up to date and be in a format suitable for publication, as any appointed Examining Authority may wish for updated versions to be submitted into the Examination at regular intervals". It is clear, therefore, that even if the issues tracker is initially agreed by the Authorities, PINS want it to be a 'live' document that is maintained by GAL through to the end of the examination. We trust that you are in agreement with this.

With regard to content formatting, the Authorities expect GAL to combine them into a single tracker, as requested by PINS, with standardised format across the issues. In addition, it is suggested that that an additional column is added so that cross-referencing can be made to the Statement of Common Ground (SoCG), so it is clear whether agreement (in whole or in part) has been reached between GAL and the Authorities on each issue.

With regard to the timeline, during the discussion at this morning's GOG Steering Group, many authorities expressed concerns about their lack of capacity to be able to fully review the trackers you have sent us prior to the deadline you suggest of 12 September, particularly given that the DCO documentation was not shared with the authorities prior to submission and a significant number of officers have been on holiday leave over the past few weeks. Furthermore, key issues raised by the Authorities in their consultation responses have not been included in the draft tracker and, therefore, it is important that the Authorities have time to identify those issues for GAL to 'track'.

Due to the above circumstances, the Authorities believe it is very important that we are given sufficient time to provide appropriate input into the Tracker and that these Trackers are agreed to



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RH10 1UZ

the satisfaction of both GAL and the ten Authorities before moving onto further detailed discussions on the Statement of Common Ground (SoCGs).

Therefore, the Authorities have agreed to write this letter to inform you that we will need more time to complete our initial reviews of the trackers; accordingly, that we require until Monday 18 September to respond to you. We would be very grateful for your co-operation in this matter. Hopefully, the process for subsequently agreeing the issues tracker should be relatively swift from the initial reviews being sent through and they should then act as a sound basis from which the Authorities can draft Principal Areas of Disagreement Summary Statements (PADSS), which we expect will be required to be submitted alongside the Authorities Relevant Representations (RRs) towards the end of October. The Issue Tracker, the PADSS and the RRs should then provide GAL with the relevant and comprehensive information to draft the SoCGs for discussion with the Authorities.

Finally, we are also aware of GAL's intention to issue the S56 notice shortly with a deadline for Relevant Representations by the end of October. Given several of the Authorities either have internal or formal committee processes to go through to agree to the submission of their Relevant Representations the end of October deadline is extremely tight to be able to fully report and respond effectively (especially given the need to review the draft trackers). We would, therefore, request that GAL kindly extend the deadline for Relevant Representations by a further week to Monday 6 November 2024 to accommodate the above local authority processes.

Should you have any queries, please contact myself.

Yours Sincerely,



**Clem Smith**  
**GOG Steering Group Chair**

Copied to:

Mike Elkington	-	West Sussex County Council
Sue Janota	-	Surrey County Council
Tessa Sweet-Escott	-	East Sussex County Council
Nola Cooper	-	Kent County Council
Helen Murch	-	Tandridge District Council
Marie Killip	-	Mole Valley District Council
Andrew Benson	-	Reigate & Banstead Borough Council
Clive Burley	-	Horsham District Council
Judy Holmes	-	Mid Sussex District Council
Tim Norwood	-	Chief Planning Officer, Gatwick Airport Ltd



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**Annex A3: GAL Response to the JLAs 5 September 2023**

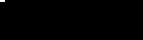


**LONDON GATWICK**

POWERED BY  

5<sup>TH</sup> SEPTEMBER 2023

Mr C. Smith  
Crawley Borough Council  
Town Hall  
The Boulevard  
Crawley  
West Sussex  
RH10 1UZ

Sent by email to  [@crawley.gov.uk](mailto: [redacted]@crawley.gov.uk)

Dear Clem,

**Gatwick Airport Northern Runway DCO  
NRP Local Authority Issues Tracker**

Thank you for your letter of 4th September which we received last night. To address your last point first, the Section 56 notices setting out the Relevant Representation period timing were published in local and national newspapers this morning which confirm 29th October (as previously advised to you) as the end date. This same date is confirmed on the Project webpage on the Planning Inspectorate's website. The period made available for the Relevant Reps is significantly longer than the statutory minimum and was selected to acknowledge your previous comments on this and we consider provides sufficient time for all the authorities and any other interested party to respond effectively. For this reason, we do not propose to extend the response period.

On your request to take longer than the PPA requires to respond to the completeness of the issues trackers, we are willing to allow an extra week as you request and to receive your response on 18th September instead. We hope that this will allow your response to fully highlight any issues you think may still be missing from the trackers as issued to you.

On your request to consolidate the trackers into a single one, we are willing to do this and (in the interests of efficiency) will progress with this whilst you consider the lists already sent to you, and we can then supplement this with any additional issues that you identify in your response on 18th too. We will aim to issue this to you as soon as possible after receiving your comments. We concur that any new issues arising from your Relevant Reps should then be added to this list and agreed between us before proceeding to the Statement of Common Ground stage.



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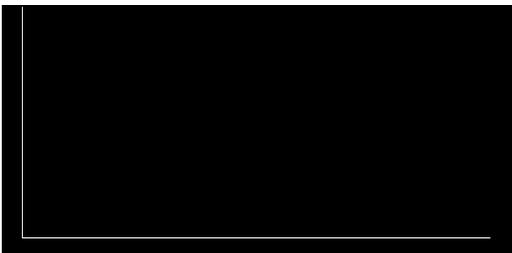


Regarding the status of the consolidated Issues Tracker as we move into examination, we remain of the opinion that it would be better to use the Issues Tracker to inform the development of the SoCG and for that document to then be the 'live' document which tracks which issues are agreed and/or remain outstanding and informs the Examination. We think this would be consistent with what SoCGs are designed to do and the role they typically play in examinations.

We believe it would be inefficient to try to keep both the SoCG and an Issues Tracker updated, which will necessarily cover the same information and will duplicate our mutual resource. We see the Issues Tracker as a 'point in time' document, to act as a precursor to the SoCG and which can then fall away once those drafts have been produced; however, we are entirely open to discussion on what is likely to prove most helpful, both for yourselves but also of course taking into account the view of the Examining Authority.

We look forward to hearing from you on 18th September.

Yours sincerely,



**Jonathan Deegan**

NRP Programme Lead  
London Gatwick



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## **Annex B: Proposed approach to developing the JLA thematic Statement of Common Ground**

## Statement of Common Ground – Themes

The Local Authorities have advised which thematic matters they wish to engage on. The latest version provided to GAL is as follow:

		CBC	WSCC	SCC	ESCC	KCC	HDC	MSDC	MVDC	RBBC	TDC
1.	Principle of development	X	X	X	X	X	X	X	X	X	X
2.	Historic Environment	X	X	X		X	X	X	X	X	
3.	Landscape, Townscape and Visual	X	X	X			X	X		X	
4.	Ecology and Nature conservation incl habitat regs	X	X	X			X	X		X	
5.	Geology and Ground water	X	X	X			X	X		X	
6.	Water Environment	X	X	X			X	X		X	X
7.	Traffic and Transport	X	X	X	X	X	X	X	X	X	X
8.	Air Quality	X		X	X		X	X	X	X	X
9.	Noise and Vibration	X	X	X	X	X	X	X	X	X	X
10.	Climate	X	X	X	X		X	X	X	X	X
11.	Greenhouse gases	X	X	X	X	X	X	X	X	X	X
12.	Socio-economics	X	X	X	X	X	X	X	X	X	X
13.	Health and well being	X	X	X	X	X	X	X		X	X
14.	Agricultural land and Recreation	X	X	X			X	X		X	
15.	Cumulative effects	X	X	X	X	X	X	X	X	X	X
16.	Other matters	X?	X?	X?	X?	X	X?	?	?	?Property	?



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## Annex C: Proposed Statement of Common Ground parties

- 1.1.1 **Table 1** sets out the parties with whom the Applicant intends to develop Statements of Common Ground (SoCG). This table will be updated at each deadline as part of the Statement of Commonality (a future application document) to summarise the status of each SoCG.
- 1.1.2 SoCG with additional parties may also be submitted, particularly those statutory undertakers with apparatus in the Order Limits with whom the Applicant is currently engaging to agree appropriate protective provisions. An update will be provided by the 29<sup>th</sup> October 2023 in response to any representations received from such bodies.

**Table 1 Current status of the Statements of Common Ground**

Interested Party	Our Doc Ref/version	DL1	DL2	DL3	DL4	DL5	DL6	DL7	DL8	D9	Current Status of the SoCG
Crawley Borough Council	TBC										Draft
East Sussex County Council	TBC										Draft
Horsham District Council	TBC										Draft
Kent County Council	TBC										Draft
Mid Sussex District Council	TBC										Draft
Mole Valley District Council	TBC										Draft
Reigate and Banstead Borough Council	TBC										Draft
Surrey County Council	TBC										Draft
Tandridge District Council	TBC										Draft
West Sussex County Council	TBC										Draft
Environment Agency	TBC										Draft
Historic England	TBC										Draft
Natural England	TBC										Draft
National Highways	TBC										Draft
Network Rail	TBC										Draft
Thames Water	TBC										Draft