

CRAWLEY BOROUGH COUNCIL

RESPONSE TO GAL'S DRAFT ISSUES TRACKERS SENT ON 18 AUGUST 2023 OMISSION ISSUE TRACKER TABLES

15 SEPTEMBER 2023

Historic Environment

Issue Not Listed in trackers	Stage at which raised with GAL
<p>Not clear if the setting and siting of heritage assets has informed the design and siting for the NRP – evidence and information in (heritage) chapter needs to be cross referenced with text and drawings (in particular CH5). Overall lack of detail on project description works and building siting / design (Care building/ decked car parks and clarity on Car Park X. Lack of details on engineering and flood compensation area and impact on landscape character. Various inconsistencies flagged.</p>	<p>PEIR response – 7.5 / 7.6 /7.7/7.9/7.10/7.11</p>
<p>Further information needed to understand if is any historical connection between engineering land and assets 157 and 192 as result of works.</p>	<p>PEIR response 7.7</p>
<p>CBC does not accept at this stage that there is no negative impact from the NRP on above ground heritage assets. At this point, the lack of clarity on the development works required as part of the project, the location, form, design of the physical works and the absence of a lighting strategy result in a premature conclusion on these impacts. These details and discrepancies must be addressed.</p>	<p>PEIR response – 7(a)</p>
<p>Further work is necessary in relation to the heritage assets identified in this report to fully demonstrate the impact of the works on their setting as currently there is a lack of evidence provided. Cumulative impacts must be considered (Asset 27, Asset 23/388, Asset 24, Asset 157 and Asset 192).</p>	<p>PEIR response – 7 (b) and para 7.4</p>
<p>Mitigation and enhancement measures should not just be limited to on site assets but opportunities considered for those heritage assets which are located beyond the development boundary where their setting could be improved by physical works or landscaping within the NRP boundary. Further consideration should be given to the NRP design and layout to further reduce impacts on heritage assets.</p>	<p>PEIR response – 7 (c) – only part summarised in the GAL issues Tracker 1 – Heritage 4</p>
<p>7e -Archaeology Surrey CC (CBC archaeology consultee) “ Overall, this is a decent submission, with the major caveats of not appraising the heritage/archaeological significance of either the airport or the land beneath it, and a local disagreement with the way the nationally-defined assessment methodology ends up grading the heritage assets. We look forward to the continuation of archaeological evaluation work to better appraise and define the potential of the sites they’ve not done yet – particularly within and around Museum Field, but also on Pentagon Field and</p>	<p>PEIR response – 7 (e) – Noted this comment part addressed in Tracker 1 – Heritage 6.</p>

<p>Crawters Field, and in association with the River Mole diversion. To take forward to GAL, we'd strongly recommend a Historic Area Appraisal of the Airport itself to address the gaps in the study highlighted above, and we're hoping that the borehole and geotechnical information that they say will be looked at later will be a comprehensive survey rather than just a few cursory markers here and there, as if not we'll have to request more ground truthing to confirm the archaeological truncation they're confident that has occurred. Absence of this data is a pretty major omission and we'd really like to see this as soon as possible, preferably prior to the grant of a DCO for the project."</p>	
<p>Surrey CC (CBC archaeology consultee) disagree with some of the "significance" assessments in the baseline study. Disagree with scoped out aspects of assessment in Table 7.4.2.</p>	<p>PEIR response 7.17 and 7.18</p>
<p>Surrey CC (CBC archaeology consultee) listed out areas where outstanding concerns and further work required – surface assess satellite contractor compound, flood compensation area car park X, car park Y, ST IDL Extension, new hotel at building compound adjacent to car rental, satellite airport fire surface facility, Airfield surface transport and ground maintenance facility, decked car park north terminal long stay car park 1, NT IDL extension and baggage reclaim, inter terminal transit system, CARE facility (option 1), replacement motor transport facility, NT baggage hall extension, decked car park NT long stage phase 2, development ST (hotel, office, car park H), pumping station 7a, substation north of Pier 7, New Hangar, Pier 7.</p>	<p>PEIR response 7.25</p>
<p>Surrey CC (CBC archaeology consultee) – the area of the airport has not been adequately tested to support the suggestion that there is little or no meaningful archaeological material buried beneath it. Expect as a bare minimum a historic map regression for each detailed area of impact showing the successive developments which led to this conclusion and some geotechnical information to verify truncation</p>	<p>PEIR 7.27</p>
<p>Surrey CC (CBC archaeology consultee) – a geo archaeologist should become involved at an early stage to further assist identifying those areas where paleochannels or significant palaeo environmental remains may exist as well as suitable evaluation methodology to test this.</p>	<p>PEIR 7.27</p>
<p>Surrey CC (CBC archaeology consultee) – Document includes a good catalogue of what's likely to be in the STV but without impacts and the visualisations, ifs difficult to assess.</p>	<p>PEIR 7.28</p>
<p>CBC request further information of the likely landscape and visual impacts from the attenuation features proposed at Car Park X and Car Park Y. Please can further details be provided of what these works consist of and what the impact are on tree screening? Car</p>	<p>Land and Water TWG response 31/10/22</p>

<p>Park X works have potential to have a negative impact on nearby listed buildings.</p>	
<p>CBC welcome that further consideration has been given to its comments in relation to Charlwood Park Farmhouse however it requests sight of the information and evidence to back up the comments made during the presentation. One aspect that was not discussed at the meeting was the potential opportunity GAL has to improve the setting of this heritage asset – such as removal of some the parking areas around this building. Please can this be addressed as part of the evidence.</p>	<p>Issue First raised in PEIR response by CBC, some detail provided but further comments Land and Water TWG response 31/10/22</p>

Landscape, Townscape and Visual Resources (incl Design and Access Statement – Structure and Design)

Issue Not Listed in Trackers	When Matter raised by CBC
Land Use Masterplans - CBC remain concerned that these seem very 'high level' and lack detail. While accepting this document is 'work in progress' GAL need to consider carefully the 'readability' of this document for key stakeholders and the general public as this is likely to be the main document read by many to understand the proposals. The challenge is for this to be sufficiently detailed to present a comprehensive overview of the development and its impacts during construction.	Planning A Meeting 23/11/22
Masterplan works – this drawing seems to just focus on the physical car parks and buildings when the development works (some of which are major and vital for the project) such as the widened runway itself, drainage works and associated earthworks are not referred to. The design of boundary treatments will also be critical in some locations, such as along the southern boundary This is currently an incomplete picture of the DCO project. The land use masterplan should be comprehensive and refer to all development.	Planning A Meeting 23/11/22
DAS Structure - The concept of using a design guide to secure parameters for the development (building / car park elements) is understood. CBC would like comfort that the details and any parameter plans are sufficiently detailed to ensure control of the development over the plan period in line with the Rochdale Envelope requirements.	Planning A Meeting 23/11/22
DAS Structure - CBC would also wish to see detailed designs for key infrastructure, the implementation of which is fundamental to mitigation for some aspects of the development. Road design, drainage measures and engineering operations / landscaping need to be understood in 2 detail as part of the DCO consideration. These elements should not be left as design matters for later in the process.	Planning A Meeting 23/11/22
DAS Structure - The design images in the emerging document appear rather uninspired and 'dull'. While CBC accept there needs to a functional aspect to every building, this project should be an opportunity to push for high quality design (as required through the NPPF) and for GAL to set ambitious design codes for its property portfolio.	Planning A Meeting 23/11/22
DAS Structure - Where plots (such as hotels) may be released to others to implement, CBC would wish to understand how, though	Planning A Meeting 23/11/22

the DCO process GAL intend to ensure control of the development and design aspirations it sets out in its design code.	
Zones - CBC note that these slides lack detail and that as the work progresses it is vital that this is expanded upon as part of the submission. Given the duration of the construction project, CBC agree with WSCC that the level of detail for the construction compounds needs to a similar level of detail as the permanent structures.	Planning A Meeting 23/11/22

Water Environment Issues Tracker

Issue Not Listed in Trackers	Stage at which raised with GAL
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.	PEIR response – 11 (b) . Comment only part summarised in issues Tracker 1
No recommendation can be made at this stage until the full fluvial and pluvial flood risk mitigation strategy has been submitted for consultation. CBC requests early engagement as this is developed.	PEIR response – 11 (c)
<p>In respect of the overall drainage strategy CBC remain concerned that the concept designs will not provide sufficient detail. CBC would like to see the evidence behind the FRA work that underpin the concept design. Jonathan indicated that the concepts designs would be shared 'within weeks'. These need to be circulated in good time (more than 5 days) if the TWG is to provide meaningful feedback on these.</p> <p>It would be helpful if GAL could share the Consultee comments from key stakeholders such as the Environment Agency to understand how aligned or otherwise they are with our views on the drainage and FRA work done to date. It was not clear how all this has progressed from the PEIR consultation</p> <p>11 (c) No recommendation can be made at this stage until the full fluvial and pluvial flood risk mitigation strategy has been submitted for consultation. CBC requests early engagement as this is developed.</p>	Land and Water TWG 10 May 2022
With regard to wastewater, CBC have key concerns about the impact of the development on the capacity for the sewage treatment works to expand. This question [11 b] remains outstanding as it was not addressed.	Land Water TWG 10 May 22
Drainage – South Terminal Roundabout (fig 2.3 substantial modification to surface water pond) CBC request the design parameters (in accordance with the SuDs manual) for the new pond are provided if this proposal is to be taken forward along with details of the changes that will be carried out on the existing pond, the impact and mitigation measures	S42 response – 6.6
Airport Way works (addition of 3 rd lane) . CBC request further detail on the extent to which this proposal will increase the existing impermeable area and further information on how this will be mitigated	S42 response – 6.8

<p>CBC require more detail on the drainage impact of these highway works (including further information on the net loss of greenfield space /permeable run off and how and where mitigation will be carried out.</p>	<p>S42 response – 6.12</p>
<p>Updated flood compensation assumptions of Museum Field and Car Park X, south of Sewage Treatment works , Pond A and Dog Kennell Pond. CBC has insufficient detail to accept the assumptions set out in this update and request that it is provided with further information including: · A simple tabulated hydraulic model report showing the comparison between the storage requirement of the 35% and 20% event. This should support the explanation of how this reduction was arrived at and help to demonstrate the practicality of this scenario. · CBC also requests confirmation that the concept design showing how the museum field compensation storage area will connect to the River Mole will not have a detrimental effect on the geomorphology of the watercourse bed. · CBC also requires a Construction Phase Plan for the management of surface water during construction (this can be supplied closer to the time the developer will be mobilising to site to accommodate any future changes in the flood risk plan). GAL should also ensure that because of the significance and sensitive nature of this scheme a post construction certification of the drainage works is provided to CBC and other drainage authorities. This shall confirm that the proposed works including the SuDS flood mitigation features proposed in the FRA and drainage statement have been constructed as stated. This shall be carried out by a third party and not the consultants engaged for the flood risk mitigation design.</p>	<p>S42 response – para 7.57 and 7.58</p>
<p>It is noted that flood compensation areas are being reduced at Museum Field and Car Park X and that 2 other flood compensation areas and 2 pond extensions are now not required. However, a new treatment works to clear de-icer and contaminated runoff is now proposed to the east of Crawley Waste Water Treatment Works, on the site of the former Rolls Farm. CBC notes that there is no detail on what this infrastructure would consist of, nor the visual impact this might have. It is therefore unclear if this infrastructure has any negative impact on nearby houses to the south in Radford Road in terms of visual impact or odour and whether there is a negative impact on biodiversity (it appears to be on land managed for biodiversity by the Gatwick Greenspace Partnership). CBC wishes to see further detail on this proposal and also seeks assurances that the siting of this infrastructure would not have a negative impact upon the potential expansion of the Crawley Waste Water Treatment Works which the council's Water Cycle Study 2020 has indicated may be necessary to support future development in the borough. The council would welcome the opportunity to be involved with GAL in discussions with Thames Water regarding the capacity</p>	<p>S42 response – 7.59 and 7.60</p>

constraints at the Crawley Treatment Works, in the light of cumulative growth in the area combined with single runway airport growth and the NRP.	
CBC comment that overall there seem to be quite a few changes since the PEIR and there has been no real detail provided to help understand these. While there is a repeat commentary on further detail not being provided this is not helpful to CBC or others if we can't be certain on the base assumptions provided to underpin the strategy. The risk of not providing the information now is that it could be a problem later in the process.	Land and Water TWG response 31/10/22
CBC request more detail on the drainage changes proposed, the summary table does not seem to pick up the changes described at the presentation.	Land and Water TWG response 31/10/22
CBC request further information on the proposed monitoring scheme post construction for museum field – picking up the issues that were explained regarding silting and build up.	Land and Water TWG response 31/10/22
CBC request further information of the likely landscape and visual impacts from the attenuation features proposed at Car Park X and Car Park Y. Please can further details be provided of what these works consist of and what the impact are on tree screening? Car Park X works have potential to have a negative impact on nearby listed buildings.	Land and Water TWG response 31/10/22
In relation to Wastewater CBC do not agree with the conclusions set out in that slide. GAL should await a final comment from Thames before firming up the proposals in relation to this area. CBC welcome the comment made at the meeting that there was 'some flexibility' in relation to the positioning of the de icing facility if Thames need to expand. CBC request that further information about the land take around the sewage treatment plan and de-icing be provided to understand how capacity could be safeguarded.	Land and Water TWG response 31/10/22
CBC request that GAL confirm what the potable water use targets are for the development.	Land and Water TWG response 31/10/22
A number of detailed questions raised by the CBC drainage officer Segun Oke remain unanswered. When can CBC expect a response be provided to these?	Land and Water TWG response 2/12/22
(1)The initial plan by GAL back in July 2022 in response to the updated climate change allowance was to (I) reduced in size the Museum Field and Car Park X flood compensation areas, (ii) remove the flood compensation area to the south of Crawley Sewage Treatment Works and the small area to the east of Museum Field as they will no longer be required and (iii) the surface water drainage Pond A and the extension to Dog Kennel	Land and Water TWG response 10/01/203

<p>Pond will also no longer be required. In line with this new development I requested GAL to send me a simple tabulated hydraulic model report showing the comparison between the storage requirement of the original 35% CC and the new 20% CC . This will buttress the explanation of how this reduction was arrived at and help to demonstrate the practicality of this scenario, but this request was never attended to and the information has not yet being supplied.</p>	
<p>(2)Sequel to the above development, the last TWG which the above slide relates to indicates that pond A was actually removed to accommodate the new Juliet taxiway in contrast to the earlier statement by GAL, and several storages have now been provided to compensate for the removal of pond A. Can GAL kindly send me the requested information in 1 above.</p>	<p>Land and Water TWG response 10/01/203</p>
<p>(3)The slide and presentation shows that an additional three hectares of carriageway will be created from the proposed work to the highway and three attenuation basins and two oversized pipes have been planned as part of the highway drainage strategy to mitigate the increase in impermeable area. I want to believe this should be an opportunity for GAL to improve on the sustainability aspect of the Highway and in addition to water quantity provide water quality mitigation strategy in line with the SuDS manual, this should not be a case of just doing the minimum.</p>	<p>Land and Water TWG response 10/01/203</p>
<p>(4)The proposed highway drainage strategy will reduce discharge by 38% to the Gatwick stream and 50% to the river Mole, while this may be an acceptable approach, can GAL kindly have a look at the effect this reduction in discharge will have on biodiversity and provide mitigation where necessary.</p>	<p>Land and Water TWG response 10/01/203</p>
<p>(5)During the last focus consultation on highway improvement works and updated changes to flood risk management back in July 2022, I requested for GAL's plan to ensure that the proposal to connect the museum field compensation storage area with the River Mole will not have a detrimental effect on the geomorphology of the watercourse. From the above slides and in response to this GAL has proposed to put in place a post construction monitoring plan to monitor the river Mole. I want to believe this will be in conjunction with erosion control design measures that will be put in place to arrest or minimise the effect of this connection on the geomorphology and the possible migration of the banks to the river Mole. Can GAL confirm that aside from the post construction monitoring exercise, erosion control measures will form part of the design to connect these two flood structures.</p>	<p>Land and Water TWG response 10/01/203</p>

<p>(6)One of the slide above shows a concrete section which is used to depict car park Y attenuation tank, while I understand the need for GAL to attenuate water using systems that can be designed to reduce the attraction of birds, the use of a more sustainable approach with reduced carbon footprint will be the preferred option rather than using designs with a high carbon foot print.</p>	<p>Land and Water TWG response 10/01/203</p>
<p>(7)During the presentation one of the officers from Mole valley council made mention that a recent visit to the long bridge shows the water level just a few inches below the bridge suffit. GAL responded that the peak flow rate to the river Mole pre and post construction will remain the same but the discharge will be for a longer period of time, therefore, it is most unlikely that the water will overwhelm the bridge. This principle will only stand if there is no obstruction to the flow within the watercourse downstream this area. Can GAL confirm how this possibility has been dealt with during the hydraulic modelling phase.</p>	<p>Land and Water TWG response 10/01/203</p>
<p>An additional meeting should be arranged to deal with the overlap between drainage and ecology matters in particular in relation to the northwest area and the impact on the River Mole. It would be good to understand the drainage design and engineering solutions necessary and the impact these have on ecology in relation to matters such as sediment build up, flood overspill , de-icer storage and pollution control measures. Further information should be provided on the management of both the drainage features and ecological mitigation measures.</p>	<p>Land and Water TWG response 10/01/203</p>
<p>CBC still remain concerned about the proposed new treatment works and proposal immediately adjacent to the Thames STW in the absence of any confirmation /comment from Thames Water on the compatibility of these works with its ability to expand the STW if required. CBC would like to see any response GAL have received from Thames Water on this capacity issue and the other infrastructure works proposed near the STW.</p>	<p>Land and Water TWG response 10/01/203 – <i>note may have been addressed in Tracker 3 – 24 TBC</i></p>

Traffic & Transport (CBC)NB. WSCC Highways comments are also relevant

Issue not Listed in trackers	Stage at which raised with GAL
The requirements of national policy with regard to assessing and improving walking and cycling infrastructure should be fully addressed.	S.42 PEIR Response
Support should be provided for the Crawley Western Link Road .	S.42 PEIR Response
CBC welcome that GAL are progressing an ASAS for the Northern Runway Project to promote sustainable travel. However, it is disappointing that a such a comprehensive transport strategy is not available alongside either the PEIR last autumn or this current consultation. The mode share targets and assumptions in the ASAS need to be understood in order to justify the parking provision and traffic modelling / highway works etc. The ASAS needs to clearly identify the measures which will be implemented to achieve its targets and show how they will interrelate, including the Public Transport Strategy, the Parking Strategy, and the Active Travel Strategy. Without these, the council cannot judge whether the measures being proposed are sufficient or, in the case of the highway works and parking proposals, perhaps overproviding. This is a significant missing piece of the project without which other aspects cannot be fully understood or commented upon at this stage.	S.42 PEIR Response
CBC feels that the ASAS should set more ambitious targets with clear metrics separated by mode (public transport (rail, bus, coach), walking, cycling). Targets should be set for each mode separately so that progress can be monitored and the effectiveness of any interventions or initiatives for each mode can be measured and assessed.	Summer Consultation July 2022
CBC also questions the definition of sustainable transport modes, which appears to include low/zero emission vehicles. The aim of the ASAS should be to move more journeys from single occupancy car use, so zero/low emission vehicles should not be included in a sustainable transport target, as this does nothing to reduce congestion and pressure on car parking, and still has some impacts on air quality.	Summer Consultation July 2022
What work has been undertaken to investigate routes to serve new development, for example, West of Crawley, including the Western Link Road /multi-modal corridor? CBC would welcome being consulted on proposals for improved bus and coach access to the airport, particularly improved local bus services.	Summer Consultation July 2022

<p>GAL should be seeking to provide parking based on the passenger growth numbers associated with the DCO and within the context of its sustainable mode share surface access obligations. There is a need for a detailed parking strategy that carefully considers and justifies the car parking requirements of the Northern Runway Project in the context of ambitious modal share targets for surface access. Currently, the parking proposals lack any robust justification for the number of spaces. The Parking Strategy, in the context of the sustainable transport strategy, should demonstrate the number of spaces required to support growth associated with the DCO, and show that Gatwick, together with existing authorised off-airport parking can meet these parking needs. This would support the Local Plan Policy approach. In justifying the level of parking spaces GAL will also need to carefully demonstrate how modal share aspirations will be achieved. Ensuring 'sufficient but no more than necessary' Parking Provision.</p>	<p>Summer Consultation July 2022</p>
<p>The council is of the view that a mechanism is required to ensure that the amount of parking provision on-airport is provided only when it is needed, and this must be monitored, therefore enabling it to be managed in line with the requirements of the S106 legal agreement. Whilst it is appreciated that an element of flexibility is required by both GAL and the Local Authorities to ensure 'sufficient but no more' parking provision, GAL's wide-ranging permitted development rights provide significant scope for new parking coming forward on airport without the need for planning permission. The principle of waiving or capping GAL's parking-related permitted development rights as part of a DCO related S106 was suggested at the Planning A TWG, and we welcome GAL's willingness to discuss options, with possible mechanisms including a 'requirement' on the DCO or an obligation within the S106 legal agreement. We note that in this event, GAL would retain the option to apply for planning permission, thus enabling new parking proposal to be assessed in light of a demonstrable need and within the context of the sustainable surface access strategy.</p>	<p>Summer Consultation July 2022</p>
<p>There is also need for a mechanism to ensure that the 'sufficient but no more' parking approach can be maintained over the construction period of the project (para 3.2.6) as areas of parking are lost (either temporarily or permanently) and replacement parking is provided.</p>	<p>Summer Consultation July 2022</p>
<p>CBC 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.</p>	<p>Summer Consultation July 2022</p>

<p>Has an assessment of current bus and coach infrastructure been made? This should be undertaken to determine the physical improvements (physical works) needed to make bus and coach travel more attractive and enable a greater modal shift.</p>	<p>Summer Consultation July 2022</p>
<p>Improved bus and coach provision is needed for early morning and late-night flights, especially if considering increasing forecourt charges when there are no other options for accessing the airport at these times. What work has been undertaken to investigate routes to serve new development, for example, West of Crawley, including the Western Link Road /multi-modal corridor? CBC would welcome being consulted on proposals for improved bus and coach access to the airport, particularly improved local bus services.</p>	<p>Summer Consultation July 2022</p>
<p>Inadequate consideration of potential for improvements to existing provision or opportunity for new active travel infrastructure to enable greater take up of walking and cycling. If improvements to pedestrian and cycle networks are limited to within the airport, then increases in active travel mode share will simply not happen. Proposals focus on upgrading infrastructure based on existing usage patterns and volumes, rather than seeking to enhance connectivity for pedestrians and particularly people on bikes into Crawley, and beyond. Many Gatwick staff live in Crawley, where much of the residential area is within 5km of the airport, providing a significant opportunity to increase the active travel to work for staff from the current 3%, if the connectivity is improved through new links and improvements to existing routes, as long as they are of high quality.</p>	<p>Summer Consultation July 2022</p>
<p>Concern regarding indeterminate length of time of temporary diversions for walking and cycling routes during the construction period, including the Sussex Border path and NCN21. The plans to sever the key national cycle network route NCN21 require people on bikes to dismount and push for a significant distance which may not be possible for some people with mobility impairments. The proposed prohibition of cycling over a section of the NCN21 as indicated in the proposals will sever the existing continuous traffic free cycle facility. This section not only forms part of NCN 21 but also the transnational 'L'Avenue Verte' route between London and Paris.</p>	<p>Summer Consultation July 2022</p>
<p>The materials presented do not show any assessment of the quality of current active travel provision. The current provision is simply indicated as a given, but this is predominantly of poor quality, and does not meet the required standards. The quality of the existing NCN21 cycle route through the GAL campus is extremely poor, as is the condition of some of the public footpaths which are</p>	<p>Summer Consultation July 2022</p>

important recreation routes, and this has not been acknowledged by GAL. The information provided does not outline any specific proposals for improvements.	
Of the little active travel infrastructure shown as part of the revised highway proposals (the A23 London Road – identified as Section 5 in the document), CBC is concerned that GAL have not applied LTN 1/20 standards to the design. The Council considers that the shared use provision is wholly inappropriate in this urban/built-up area context, and that GAL is not showing ambition to deliver high quality infrastructure in the spirit of Gear Change and LTN 1/20 which is needed to enable the switch to active modes.	Summer Consultation July 2022
The capacity of Rail Services remains a concern for the council. Improvements to Gatwick Station are welcomed but do not provide additional space on trains, nor additional services, and there is a need for further information to understand how GAL proposes to ensure services are enhanced to serve the NRP.	Summer Consultation July 2022
Re the baseline assuming for 2500 additional robotic spaces. In the absence of any evidence that the technology and capacity is feasible, these should be considered as new proposals as part of the DCO. For the current robotic parking trial (an increase of 100 spaces for a temporary three-month period) CBC agreed that this fell within permitted development, though its response was still considered within the context of the Crawley Borough Local Plan airport-parking policy. The officer report also set out that: 'The comments of WSCC and Surrey CC are also noted and while the proposal is acceptable for a trial period, the proposal if implemented would have potential to significantly increase parking capacity, the full highway impact of which would need to be properly assessed'. The Officer Report can be viewed at: Delegated report_CR20180935CON(1).pdf . The difference between a 100-car increase for a temporary three-month basis, and 2,500 cars in permanence is a significant leap, and effectiveness by no means guaranteed. CBC does not consider that this proposal can be included in the baseline as no formal consultation on details of this proposal have taken place though the Part 8 of the General Permitted Development Order process and at this stage there is insufficient detail to ascertain if such a proposal would be considered as permitted development.	Summer Consultation July 2022 Baseline Projects Response 22 August 22
CBC would like to understand whether Active Travel England will be shown all the schemes that are being proposed, and have a chance to 'quality control' them to ensure all active travel provision would be delivered to comply with LTN 1/20 – and be in the full spirit of Gear Change to enable a significant shift to active travel.	Summer 2022 Consultation CBC feedback on TWG Transport 1 November 2022

In accordance with DMRB Part 5 HD42/17 WCHAR should have been completed prior to highway design to inform opportunities for improvement in active travel infrastructure and connectivity.	Summer 2022 Consultation CBC feedback on TWG Transport 1 November 2022
Cycling and walking improvements should not be based on current usage, but designed to enable the government's target of 50% of urban journeys by active travel to be achieved.	CBC feedback on TWG Transport 1 November 2022
CBC feel that the timing of the user surveys for the WCHAR was not ideal, given the time of year, and that the clocks had reverted from summer time. This will impact on user numbers given the current poor provision.	CBC feedback on TWG Transport 1 November 2022
Have CLOS and junction assessments been made of the proposals – and can these be shared?	Summer 2022 Consultation CBC feedback on TWG Transport 1 November 2022
CBC would like to understand the specific proposal for the NCN 21 upgrades that are mentioned in the presentation and how these will meet LTN 1/20.	CBC feedback on TWG Transport 1 November 2022
Opportunities for active travel connection to Horley's proposed business park should also be explored, CBC would like to understand the timing of delivery of the Active Travel provision, and how this relates to the highway construction schedule. A timetable for construction of active travel improvements is needed – attractive active travel options need to be in place in time for the highways construction period, to give good incentive for people to switch their mode and opportunity to reduce construction congestion.	CBC feedback on TWG Transport 1 November 2022
In relation to the proposed ASAS targets, the ambition for active travel modeshare is very low, given the location of the airport between two urban centres. Schiphol airport has an active travel target of 15% for employees within a 25km radius (aiming to build on the growth of e-bikes).	CBC feedback on TWG Transport 1 November 2022
However, the policy includes some important criteria which the Council would expect to be addressed by GAL in justifying its hotel proposals in the DCO, particularly demonstrating that the hotel proposals do not compromise ability of airport to meet operational requirements going forward. Any parking provision at new hotels should be limited and considered in the context of the overarching parking and transport strategies.	CBC feedback on TWG Planning A 12 May 2022

Air Quality

Issue not listed in trackers	Stage at which raised with GAL
Signposting in the Issue Trackers produced by GAL inaccurate in places (Tracker 1 - Monitoring and Health Impacts Section 3.10 of ES Chapter 13)	Email correspondence 06/09/23
Request for re-run of Air quality modelling following updates to traffic models	AQ TWG 16.03.22
Request for sensitivity testing in light of WHO's recent guidance on reducing annual average nitrogen dioxide concentrations.	AQ TWG 16.03.22
Concerns around the use of solid-state sensors e.g. AQ mesh for long term on airport monitoring, which are not approved for use on the national network, remain.	Email correspondence 27/10/22

Noise and Vibration

Issue not Listed in trackers	Stage at which raised with GAL
That GAL provide clarification over the modelling and undertake further scenario testing as described above in addition to any other scenarios arising from discussion with the local authorities.	S.42 PEIR Response
GAL is required to adopt the proper process as set out in CAP 1169 to set an appropriate scheme for a noise envelope. In this GAL is to include the Joint Districts and Boroughs as well as the West Sussex County Council and the Surrey County Council.	S.42 PEIR Response
It is recommended that the environmental assessment is updated to take account of likely or actual changes to airspace or options that are proposed by FASI.	S.42 PEIR Response
Where, due to timings, the Noise Action Plan cannot be replaced immediately, the new plan will need to run concurrently with the extant plan.	S.42 PEIR Response
Concern regarding the potential use of Gatwick Goods Yard for aggregates and the potential for noise disturbance to residents, particularly at night.	S.42 PEIR Response, Summer Consultation July 2022 Response
The increase in capacity at Gatwick will mean routes not previously used frequently would experience significantly more air traffic than at present. The council is aware that significantly greater use of WIZAD, for example, will be required to achieve the suggested hourly movement rates both with and without increased use of the Northern Runway and this would need to be aligned with FASI-S and potentially require to be assessed against the CAP1616 criteria for airspace change, as required by PINS in the Scoping Opinion.	Summer Consultation July 2022 Response
Modelling 2019 ATMs with 2032 fleet technology.	AoC Appendices
Forecast single mode for future years.	AoC Appendices
Annual and summer contours should be provided to monitor growth outside the summer period (as requested by PINS)	AoC Appendices
It is also unclear how the noise envelope relates and works with other regimes e.g. DfT night flight noise regime, landing	Position Statement March 23

fees and charges and the Noise Action Plan required under the Env Noise (England) Regulations 2006.	
Need for further scenario testing including 100% Easterly and Westerly modal split for specific years comparison of the difference between what the noise would be now with current aircraft fleet, ie modelling future fleet mix at current movement levels, the cumulative impact of additional night time awakenings for the location.	Position Statement March 23
Compensation for residual impacts remain to be negotiated.	Position Statement March 23
Noise impacts of construction, including material supplies not well understood.	Position Statement March 23
To prevent and minimise ground noise and air noise impacts on residents any Northern Runway usage should be limited to operations between 07:00 to 23:00 and is only used during the day for Chapter 3 aircraft or quieter - [NB The effect of this proposal on other routes based on future operations needs to be determined]	Position Statement March 23
Requirement to understand fully the implications of the potential greater use of WIZAD including establishing background levels now as LAeq as well as Lmax events in those locations to demonstrate.	Position Statement March 23
Means of governance and scheme of regulation for the noise envelope, control of ground noise, construction noise etc. and expectations over enforcement incl. funds required for local authority oversight and enforcement.	Position Statement March 23

Carbon and Climate Change

Issue not listed in trackers	Stage at which raised with GAL
The precautionary principle must be applied, with expansion only being allowed in line with a demonstrable emissions reduction plan, to be agreed in advance, that sets out a proven trajectory to net zero. If the agreed emissions reduction trajectory is not met, then the operation would need to cut back until it was back in line with commitments.	S.42 PEIR Response
GAL should assess all types of GHGs which have the potential to contribute to a likely significant effect on climate. This is in line with the Planning Inspectorate's comments.	S.42 PEIR Response
GAL should review the environmental cost calculations to ensure the most up to date carbon values are used.	S.42 PEIR Response
CBC believes that, given this significant risk of not being able to meet the required carbon reductions on this pathway, Gatwick's expansion should be phased and linked to thresholds for meeting carbon reduction commitments in line with the net zero target for aviation. If these carbon reductions thresholds are met, then further expansion in terms of increases in passenger numbers would be allowed. There is also the question around whether additional on-airport infrastructure would be needed to support these emerging aircraft technologies, in terms of electricity supply or hydrogen production and storage. CBC would want re-assurance that this technology is capable of being accommodated in the airfield. This should be explored by Gatwick as part of their DCO submission.	Summer 2022 Consultation
Given the significant slice of the nation's carbon budget (at 2050) taken up by Gatwick's planned expansion, CBC feels that stakeholders should be consulted on Gatwick's 'Carbon Action Plan' as soon as possible, and before the DCO submission.	Summer 2022 Consultation
It would be useful to see the draft EIA and Climate Resilience Strategy to see to what extent the adaption/mitigation GAL are proposing is addressing the risk that GAL have identified. It is disappointing that the current position is that this will not be shared in advance of the DCO submission/acceptance.	LA feedback on Carbon and Climate Change TWG 18 January 2023
It doesn't appear that the impact of extreme climate impacts on critical infrastructure has been addressed. This is required to ensure that safety critical features will not be affected by more radical changes to the climate beyond that	LA feedback on Carbon and Climate Change TWG 18 January 2023

projected in UKCP18. Have H++ climate scenarios to test the sensitivity of vulnerable safety critical features?	
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Socio Economic

Issue not listed in trackers	Stage at which raised with GAL
The council recommends that GAL formally states that it no longer requires national policy to require land at Gatwick to be safeguarded for a potential future southern runway. This will allow Crawley to identify land new employment land to accommodate economic growth associated with the NRP.	S.42 PEIR Response
CBC has recommended a range of community compensation initiatives and would urge GAL to engage with the council to scope these further.	S.42 PEIR Response
GAL should explain in detail its reasoning for the NRP proposing so few mitigation measures for the communities affected by the proposals, when compared to the far greater compensation proposed through the original 2nd runway proposal for the Airports Commission study.	S.42 PEIR Response
No monitoring measures have been proposed in relation to socio-economic receptors. CBC strongly encourage GAL to undertake monitoring of the economic outcomes delivered through the NRP.	S.42 PEIR Response
The consultation information suggests that the forecast hotel bed need has increased since the Autumn 2021 consultation, but CBC is unsure why this is the case. Has forecast passenger growth increased since the previous consultation, necessitating the increased hotel need? CBC would be interested in reviewing the technical evidence supporting the conclusions on the need for hotel provision, and in understanding how they meet the Associated Development test for the DCO. As it stands, it is unclear why the identified hotel need appears to have increased.	Summer Consultation July 2022
As a point of clarity, the council would ask GAL to explain whether hotel provision represents an operational use that meets the DCO 'associated development' test (as they are not included as an operational building under Part 8 of the GPDO). Whilst there are clear sustainability benefits to on-airport hotel provision, this would not at face value (given that hotels are located off-airport also) appear to justify their identification as an operational use. If GAL does consider hotels to be an operational use, it would be helpful to understand why this is felt to be the case. This is an important point to clarify, as if hotels are not operational uses, then they should be subject to a separate planning application rather than be included in the DCO.	Summer Consultation July 2022

<p>CBC notes that GAL has compared its 2047 demand projections with the DfT JetZero updated national forecasts for 2050 in Table 3.3. This is misleading in two ways:</p> <ul style="list-style-type: none"> • Firstly, it is comparing 2047 with 2050 and GAL is silent on whether they would still expect growth beyond 2047 with the NRP. • Most of the growth projected with the NRP is over the period to 2038. By comparing at 2032 or 2038 (DfT has provided year by year figures), GAL's projected growth is almost double or 50% greater than the rate of growth projected nationally, implying a substantial increase in market share which would be at the expense of other airports and would need to be accounted for at the very least by displacement allowances in the economic assessment. By 2047, the gap has narrowed substantially. All of GAL's assumed growth is front loaded to the period to 2032, beyond 2032 Gatwick's growth is slower than DfT's assumed national growth rates. This has the effect of bringing forward the benefits and will skew the economic appraisal that has been presented. 	<p>Summer Consultation July 2022</p>
<p>There is a need to 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 – it would seem more likely that the locational requirements of such employment would be to locate as close to the airport as possible.</p>	<p>AoC – List of information / documents not shared prior to submission – August 2023</p>
<p>Travel to work data from employer survey 2016 does not allow for impacts of covid to be considered. Up to date travel to work data is needed prior to submission.</p>	<p>TWG #5 feedback TWG #6 feedback</p>
<p>Induced effects of construction employment - AECOM assume there will be an assessment of induced economic activity associated with construction in the ES. GAL recognised at TWGs #6 that this could be undertaken, but given nature of construction employment it doesn't make sense to do this. LAs request further explanation why this is the case.</p>	<p>TWG #5 feedback TWG #6 feedback</p>

Agricultural Land Use and Recreation.

Issue Not listed in Trackers	Stage at which raised with GAL
More ambitious proposals to improve other surface access facilities including local and long distance bus and coach services, and walking and cycling links should be included.	PEIR – 5 (d)
The requirements of national policy with regard to assessing and improving walking and cycling infrastructure should be fully addressed	PEIR 12 (e)
GAL should commit to substantial improvements to walking and cycling infrastructure to LTN1/20 standards.	PEIR 12 (f)
Detailed improvements to sustainable transport modes should be proposed and evaluated, as part of the justification for the mode share targets. Specific, ambitious mode share targets for public transport, walking and cycling should be separated from those for zero emission vehicles.	PEIR 12 (d)
In terms of the proposal's impacts on recreation in general, more detail is needed on the impacts and proposed diversions during the construction phases. In particular, further detail is needed on the access arrangements for the proposed car park on Pentagon Field and how this will affect Footpath 359sy, and the Balcombe Road footpath.	PEIR response – 18(a)
The Council also considers that the Project offers a significant opportunity to enhance the footpath network to the east /southeast of the airport which is in a poor condition.	PEIR response – 18 (b)
The council would also welcome engagement with GAL to assess opportunities for more direct active travel links from Gatwick Station to the proposed Gatwick Green development to the east of Balcombe Road.	PEIR response – 18 (c)
CBC object to the loss of Pentagon field and its use as soil deposition area and the negative impact this has on nearby countryside in terms of access and recreation. This element of the Project should be reconsidered or as minimum robustly justified.	PEIR response – 18 (e)
Section 5 Highway works (A23 London Road) This section of road has recreational, access, and potentially harmful ecological impacts and CBC wish to see further detail in this aspect of the proposal to understand how pedestrian/ recreational and cycle routes would be impacted. CBC has concerns about the proposed shared path.	S42 – para 6.14

<p>Brook Farm – CBC question the purpose of this land being provided for recreational use. As was explained at the meeting the red route on Fig 18.6.4 is a permissive path only and while it was explained that GAL has no plans to close or divert the route its future and the link to the field is not guaranteed. Can GAL consider enhancement to the permissive path – it can get very flooded and overgrown? GAL should also consider how this field is accessed by people from other rights of way. It does not seem like much of a recreational asset as laid out.</p>	<p>Land and Water TWG response 31/10/22</p>
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Cumulative Impacts

Issue not listed in trackers	Stage at which raised with GAL
That GAL be required to submit additional information characterising the impact in both short, medium and long term on receptors for all noise expressed cumulatively within the Environmental Statement.	S.42 PEIR Response
That the health and wellbeing impacts of both Heathrow and Gatwick airport expansion projects are considered by GAL in full through the Environmental Statement, with appropriate mitigation provided as required.	S.42 PEIR Response
CBC notes the approach that GAL has taken to the assessment of development sites in the Cumulative Effects Assessment in relation to the transport assessments and the classification of the West of Ifield site as 'Reasonably Foreseeable' which means that the site is not included in the core scenario transport modelling. Conversely, GAL has stated that the NRP will have no effect on increasing the number of homes which are required to be built in the Gatwick labour catchment area above those already planned by Local Authorities, and GAL has referenced the West of Ifield site previously as a practical example in the Gatwick labour catchment area that may serve the NRP. CBC considers the approach that GAL is taking to be inconsistent and insufficient as the inputs and approach to assessments are not being consistently applied across the topic areas.	Summer Consultation July 2022
CBC recommends that Land West of Kilnwood Vale is included in the CEA, given that it meets the sift criteria in terms of proximity to the Airport and the quantum of development. However, in its response on Slide 28 GAL suggests that the site does not yet feature as an allocation in the draft Local Plan so does not meet the criteria for assessment at this stage.	Summer Consultation July 2022

Project General / Mitigation /Other matters

Issue Not listed in Trackers	Stage at which raised with GAL
<p>It is noted in paragraph 3.1.5 and 3.1.6 that 'consideration of the projects to be included in the future baseline case' is still ongoing and that there has been a review of the parking requirements and parking impacts. CBC would like to understand what the baseline assumptions are now given as there have been some significant changes to parking, office, hotels and drainage proposals and the conclusions in this document cannot be supported or understood without further information. It is unclear what assumptions now underpin the highway modelling and it is questionable how these assumptions have been verified or deemed correct when work on other key elements such as the Airport Surface Access Strategy are still 'progressing'.</p>	S42 Consultation para 7.2
<p>CBC seeks more clarity on this aspect of the project as spoil removal will have considerable impact on the local road network and the construction traffic could produce considerable noise and dust emissions. In its response to the PEIR the council flagged its concern regarding the potential use of the Gatwick Goods Yard for aggregates, and the potential for noise disturbance to local residents, particularly at night. This needs to be addressed in the Construction strategy. Where spoil is dumped or placed in the short term does need careful consideration. In paragraph 3.10.9. GAL mention environmental, ecological and landscaping considerations but drainage is also a key consideration given the flood plain and the risk of off-site flooding. It isn't clear if Pentagon Field would be receptor site for the spoil</p>	S42 – 7.76
MITIGATION	
<p>CBC would be keen to explore with GAL through the DCO S106 o seek an annual funding contribution from GAL towards a dedicated Planning Investigations / Enforcement Officer to be completed by the joint Local Authorities and funding towards any legal resources incurred by that authority and resources for any Public Inquiry in relation to unauthorised parking.</p>	S42 – Para 7.14
<p>CBC would wish to see engagement now on matters such as community funds or suggested thresholds as mechanisms to implement any suggested approach could take time to work through due to governance issues and the need for discussion and agreement between the various parties who may be involved.</p>	Planning A Meeting 23/11/22
<p>CBC consider that there is an important area of mitigation missing from this presentation. A 'Type 4' mitigation should include mitigation to the Local Authorities for the ongoing monitoring of requirements and clauses of the legal agreement and the ongoing resource commitment to CBC as the lead authority for the subsequent approval of later designed phases of the scheme (comparable to reserved matters) for various later elements which this Council will have to administer.</p>	Planning A Meeting 23/11/22

That the health and wellbeing impacts of both Heathrow and Gatwick airport expansion projects are considered by GAL in full through the Environmental Statement, with appropriate mitigation provided as required	PEIR 19 (c)
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JF / September 2023