

Gatwick Northern Runway Project

West Sussex County Council response to Issues Trackers prepared by GAL

September 2023

Introduction

This response is on behalf of West Sussex County Council (WSSC) only and not on behalf of other District or Boroughs in the County. The following response provides comments on the structure of the Issues Trackers shared by GAL on the 21 August 2023, (and from a WSSC perspective, the overall purpose of an Issue Tracker). Further, a table of missing comments and issues raised by WSSC through the process to date has been provided.

Structure and purpose of the Issues Trackers

The [S.51 Advice](#) issued to GAL from PINS states that **(with emphasis added)**; *“the Applicant is requested to prepare such a tracker for submission into the Examination prior to the start of the Relevant Representation period. If required, the document should take account of key issues raised by relevant local authorities from the Pre-application stage onwards, and progress made in resolving them. **This 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.**”*

WSSC takes the view that there should be a single tracker, rather than a number of trackers. This should be a living document tracking progress made on resolving key issues raised by the Authorities, as indicated in the S.51 Advice from PINS. It is welcomed that GAL have responded (letter to Clem Smith of 5 September 2023), confirming that combining the four trackers into a single tracker will be undertaken, followed by circulation to the Gatwick Authorities.

As presented, the four trackers are issues lists from various dates/times, with signposting to where GAL believe evidence within the submission documents address the concerns raised.

The four trackers provided are not consistent in terms of layout/structure, making them difficult to follow.

Having issues in Tracker 1 that are superseded elsewhere is unhelpful; issues should only be listed once in the single tracker. Tracker 1 is therefore not helpful beyond setting out the issues of concern at the time, and not covering comments from all rounds of consultation and engagement.

The Issues Tracker should allow for issues to be tracked in a logical and coherent form. More columns should be included, which set out how the issue has been overcome/addressed and reference made to relevant SoCG, as well as specific evidence within the DCO submission documents. The tracker should also make clear, which authority or authorities are concerned with or raised each issue, and

include a unique reference column for each issue, allowing for cross-referencing where required.

As a living document, the tracker would allow the reader to follow progress being made, and include issues raised through the process, including those within the Relevant Representation – i.e. “meetings taking place”, “evidence being gathered and to be shared on xxx date”; this would ensure they are fit for purpose and useful to all parties.

Review of missing technical responses raised

Disappointingly, WSCC officers have had to undertake a lengthy detailed review of all comments made by WSCC through the pre-application process, to identify a list of the issues missing from the trackers. Table 1 provides a breakdown of the key elements missing from these GAL trackers, per topic, and provides details of when each comment was made to GAL.

The topics with missing comments within the Issues Trackers include:

- Ecology and Nature Conservation;
- Arboriculture;
- Fire and Rescue;
- Highways;
- Waste;
- Socioeconomics;
- Heritage;
- Carbon and Climate Change;
- LVIA/design;
- Noise; and
- Air Quality.

WSCC has raised issues with regards to noise and air quality matters, with those missing from the Issues Trackers having been included in the table below. WSCC would however refer GAL to the issues raised by the other relevant local authorities, as lead authorities on those matters, for inclusion in the tracker going forward.

On behalf of the joint Local Authorities, Crawley Borough Council has also reattached to their submission, the response made regarding the draft DCO documents circulated in May/June this year prior to submission. WSCC request that the issues raised should also be included in the Issues Tracker and GAL provide a response on how the issues have been handled in the submission DCO documents. It should be noted that some of these comments are duplicated, particularly in relation to highways and the CARE facility, within this response.

Table 1: Issues omitted from Issues Trackers shared by GAL on 21 August 2023

WSCC Issue	When issue was raised
Ecology and Nature Conservation	
Baseline Survey - PEIR Fig. 4.2.1c is labelled 'Existing Location/Environmental Features identified in PEIR'. However, it does not show all the environmental features identified in the PEIR and is therefore misleading. The Phase One Habitat Survey (Fig. 9.6.3), for example, shows additional environmental features such as woodlands, hedgerows and neutral grasslands, which should also feature in Fig. 4.2.1c.	Autumn 2021
Baseline Survey - Linear features, such as streams, ditches and hedgerows, didn't show up very clearly in the Phase One Habitat Survey (Fig. 9.6.3) presented in the PEIR. It is requested that they are highlighted. e.g. Crawler's Brook is highlighted in Fig. 4.2.1c but not shown in the Phase One Habitat Survey.	Land and Water TWG 10 th May 2022
Survey Extent -Requested that the Phase 1 Habitat Survey is extended beyond the Project Area.	Autumn 2021 Land and Water TWG 10 th May 2022
Construction - Table 9.8.1 - Protective fencing is proposed during the construction period where trees, woodlands and hedgerows are to be retained. Such fencing should also be used to protect other habitats, such as rivers, ponds and some grasslands, including those supporting reptiles.	Autumn 2021
BNG - The proposed areas for habitat creation and enhancement appear rather isolated, though linked to some extent by features such as the R. Mole. WSCC requests improved habitat connectivity and a more joined up approach with the landscape team on blue and green infrastructure.	Land and Water TWG 2 nd December 2022
BNG - WSCC would expect enhancements to green corridors and improved habitat connectivity to extend beyond the confines of the airport, along key corridors such as the River Mole and Gatwick Stream.	Autumn 2021
Baseline Survey/BNG - WSCC expects the ES to include detailed, annotated plans showing the locations of all the habitats to be retained, enhanced and created, and also those likely to be lost. Insufficient information is shown in the PEIR.	Autumn 2021

WSCC Issue	When issue was raised
<p>What opportunities are there for enhanced management of existing sites/habitats within the Project boundary, such as the extensive areas of amenity grassland alongside the runways and roads? A change in management from mowing to cut and collect could also be employed, thereby reducing the vigour of the sward and encouraging flora diversity. Reduced herbicide use would be beneficial. Any new areas of grass, including adjacent to runways and buildings, could be established on low fertility subsoil (rather than high fertility topsoil) to reduce vigour and encourage floral diversity.</p>	Autumn 2021
<p>Mitigation and Enhancement - Mitigation, compensation and enhancement measures should not be limited to within the airport boundary.</p>	Autumn 2021
<p>Will any sections of river or stream be netted, including the re-aligned R. Mole?</p>	Land and Water TWG 10 th May 2022
<p>Mitigation and Enhancement -Will GAL consider possibilities for advance mitigation, habitat creation, biodiversity enhancement & tree planting?</p>	Land & Water TWG on 26/9/22
<p>Mitigation and Enhancement -Which species will be covered in the pre-commencement ecological surveys?</p>	Land and Water TWG
<p>Mitigation and Enhancement - A clear plan or strategy for biodiversity monitoring should be presented in the ES. This should include monitoring of the condition of key habitats and population monitoring of key species.</p>	Autumn 2021
Arboriculture	
<p>There is a strong reliance throughout the PEIR that the maturity of planting will be used to mitigate impacts, although the 'Landscape Design Year' is 2038, there are significant elements of the project where landscape planting proposals will be immature, not just visually, but in ecosystem service provision too. WSCC requests GAL review and present opportunities for substantial advance planting</p>	Autumn 2021
<p>Concerns about works to Pentagon Field, being used as a site for spoil, and its potential impact to Lower Pickett Woods to the south. Impacts appear to be downplayed when taking account of proposed development in this sensitive location.'</p>	Autumn 2021

WSCC Issue	When issue was raised
<p>Are soil bunds of adequate distance from Pickets Woods to avoid impacts through root/soil disturbance?</p>	
<p>Apparent that further extensive vegetation loss is proposed as part of these highway proposals. Loss would occur, not just through direct land-take required for operational footprint, but also through temporary construction works. For example, the hedgerow and mature oak trees that define the field boundary immediately north of the Sussex Border Path would be removed to accommodate the temporary construction works, resulting in the loss of an important landscape feature. It seems disproportionate that a mature, important landscape feature like this should be lost permanently for temporary works. If there is no alternative to their removal, the trees should be replaced on a 2:1 basis. Are the trees mentioned safely retained? If lost, is essential compensation provided at a suitable quantity?</p>	<p>Summer 2022</p>
<p>It is mentioned that there would be considerable loss of vegetation from within the highway boundary. Although it is stated that this would be replaced, there is currently no information on how and where. Opportunities to enhance biodiversity should be sought, e.g. the creation of wildflower meadows on subsoil/nutrient poor soil.</p>	<p>Summer 2022</p>
<p>Other areas of concern for this vegetation loss include:</p> <ul style="list-style-type: none"> • South Terminal: new significant effect that would be moderate to adverse in the long term – removing mature vegetation; <p>Is this still the case, is it suitably justified, and is it suitably compensated for at a suitable timespan?</p>	<p>Summer 2022</p>
<ul style="list-style-type: none"> • A23 London Road: the Riverside Garden Park would be impacted by permanent vegetation removal at various widths: 8m, 9m and 13m in width; • Is this still the case, is it suitably justified, and is it suitably compensated for at a suitable timespan? • Longbridge Roundabout - greater extent of vegetation removal required, up to 45m width.' 	<p>Summer 2022</p>

WSSC Issue	When issue was raised
<ul style="list-style-type: none"> Is this still the case, is it suitably justified, and is it suitably compensated for at a suitable timespan? 	
<p>It is not just the area or extent of vegetation loss that is significant, it is the entire habitat itself which is lost, including soils (and all other ecosystem service benefits), together with loss of connectivity at a landscape scale. This particular stretch of highway (the whole project boundary), squeezed between the airport and Horley, is a vital east-west linear connection with the wider hedgerow / woodland network either side of it. It is not clear how all this additional vegetation loss would be compensated for, let alone BNG achieved, given the previous concerns raised in comments on the PEIR.</p> <p>Is suitable compensation provided throughout?</p>	Summer 2022
<p>An updated Zone of Theoretical Visibility (ZTV) showing the proposed changes to theoretical visibility caused by the new highways proposals (including the proposed noise barrier and removal of extensive vegetation along the road corridor) and the implications for visual impacts to receptors within proximity of the changes, needs to be presented to stakeholders to allow for meaningful discussions on viewpoint locations and photography undertaken by GAL.'</p>	Summer 2022
<p>Measure put in place to reduce vegetation loss including mature trees on boundaries of neighbouring land.</p> <p>What are these measures and do they reduce vegetation loss?</p>	Pre-application discussions Land & Water 9th Feb 2023
<p>Reinstatement of appropriate native woodland and grassland habitats to integrate with neighbouring landscape.</p> <p>Is this reflected in landscaping plans?</p>	Land & Water 9th Feb 2023
<p>Reinstatement of predominantly woodland planting within the highway corridor to screen and soften infrastructure.</p> <p>Is this reflected in landscaping plans?</p>	Land & Water 9th Feb 2023
<p>A23 London Rd southbound - Illustrative design shows a large area of highway planting and colonising vegetation to be removed to facilitate a proposed 2m footway and sets back signage even further, maintains clear access to slope and ditch.</p>	Land & Water 9th Feb 2023

WSSC Issue	When issue was raised
Is this a requirement or a desire? Is this compensated for elsewhere as this is to facilitate new infrastructure (with some encroachment improvement).	
Land East of Museum Field - Flood compensation area 2.6m deep and earth bund 6m high. Are trees preserved?	Land & Water 9th Feb 2023
Longbridge Roundabout & carpark B - Replacement roadside hedgerows, trees and woodland shown Are they suitable?	Land & Water - 9th Feb 2023
Pentagon Field - spoil platform (?) to 4m high; woodland belt bordering Balcombe Rd; and woodland copse proposed to south. Are trees preserved?	Land & Water - 9th Feb 2023
SoCG: WSSC request for three matters of interest for each ecology & landscape/visual, these are to be considered by GAL (no confirmation). Has this been actioned or addressed?	Land & Water - 21st June 2023
The following have not been included within the SoGC Ecology and Nature Conservation: <ul style="list-style-type: none"> • Arboricultural assessment methodology and surveyed areas. • Arboricultural impact assessment • Arboriculture - planting establishment and tree aftercare 	SoCG discussions
The following have not been included within the SoGC Landscape, Townscape and Visual: <ul style="list-style-type: none"> • Arboriculture - planting and establishment • Arboriculture - assessment of effects • Arboriculture - compensation for tree loss 	SoCG discussions
Have the following been considered from the DCO draft recommendations: <ul style="list-style-type: none"> • Part 4 Sec. 23 - multiple amendments recommended; 23 (7). 'hedgerow' not defined in act stated. Are these concerns addressed? • Schedule 2 (requirements) - recommend including: <ul style="list-style-type: none"> ○ Construction Environmental Management Plan (CEMP); ○ Vegetation Clearance Plans; ○ Vegetation Retention Plans; ○ Landscape Maintenance and Management Plan (LMMP); 	Comments on the Draft DCO submitted in May 2023.

WSSC Issue	When issue was raised
<ul style="list-style-type: none"> ○ Detailed Landscape Plan (soft and hard); ○ Arboricultural Method Statement (AMS) inclusive of associated Tree Protection Plans (TPP). ● Amendments to approved details - The relevant planning authority is expected to approve such amendments which must be stated within this section. Is this concern addressed? ● Time limits - completion date expected ● Highway works - include local highways ● Construction Environmental Management Plan - further details and adherence to AMS ● SCHEDULE []: DOCUMENTS TO BE CERTIFIED - include: <ul style="list-style-type: none"> ○ Construction Environmental Management Plan (CEMP); ○ Vegetation Clearance Plans; ○ Vegetation Retention Plans; ○ Landscape Maintenance and Management Plan (LMMP); ○ Detailed Landscape Plan (soft and hard); ○ Arboricultural Impact Assessment (with tree retention and removal plan); ○ Arboricultural Method Statement (AMS) inclusive of associated Tree Protection Plans (TPP). 	
West Sussex Fire and Rescue	
<p>WSSC is concerned about the performance of the proposed highway mitigation, which has not been demonstrated through a transport assessment. The proposed highway mitigation would increase some journey times (including potentially for emergency response vehicles) and result in a redistribution of traffic, including from the strategic to the local highway network. However, it has not been possible to assess this due to the lack of information provided</p>	<p>Summer 2022</p>
<p>There are a number of comments from West Sussex Fire and Rescue regarding the design and potential effects upon emergency response times, some aspects are given below. A meeting to discuss these elements would be welcomed.</p>	<p>Comments raised on the Draft Project Description in May 2023.</p>

WSCC Issue	When issue was raised
<ul style="list-style-type: none"> • CARE facility – WSCC Fire and Rescue would require consultation on the Fire Prevention Plan, is this available as an outline document? • How has/will fire fighting detection and infrastructure been considered in the outline design? • 5.2.51 – we would like to understand what this provision/facility would look like • 5.2.59 – has fire prevention infrastructure been considered in the outline design? Engagement with West Sussex Fire and Rescue would be required to ensure this has been factored in. • Notification through the construction phase will be required, especially in relation to decommissioning of sprinkler system for extension works to the terminal etc. This is a wider point for all construction elements, including highways works. • 5.2.62 – need to understand the changes to these areas and how emergency access provision has been taken into account. • Power strategy – will there be a battery storage included in the design, this is not mentioned? • WSFRS IS fully aware of the need to invest in the counties waste and recycling infrastructure, to deliver efficient and effective, management and treatment of waste within the county, and support the Government drive towards Net Zero. Therefore this plant should use 'Best available techniques' (BAT) to ensure that the plant delivers maximum efficiencies when recycling and processing waste materials. • Nationally there have been a number of serious fires affecting these facilities impacting local communities, businesses and the environment, therefore this plants should be afforded the highest levels of fire protection, to ensure its safe operation, and importantly it's resilience as a key part of the waste processing infrastructure within the county. • The co-location of recycling and waste processing operations often brings further efficiencies and can reduce the carbon footprint of 	

WSCC Issue	When issue was raised
<p>these facilities, however careful consideration should be paid to the design of the plant, to avoid the possible escalation of a single incident and specifically a domino effect generated through the storage of large quantities of waste and recycling materials at the premises.</p>	
Highways	
<p>Summary from main report - lack of evidence, pandemic implications on staff levels, assessments do not take into account the site-specific impacts of emerging large development sites in the area; these include West of Ifield, Gatwick Green, and Horley Business Park. Mitigation levels are unclear or limited (including active travel). Reactive, not proactive.</p>	Autumn 2021
<p>Summary issue - There are Network Rail and National Highways schemes included in the future baseline assessments that are not fully funded or going through the relevant statutory planning process; these include the Croydon Area Remodelling Scheme (CARS), a strategic rail improvement, and the Lower Thames Crossing (LTC), a strategic highway improvement.</p>	Autumn 2021
<p>Summary - need to address - concerns related to traffic and transport access, including the impact of other strategic development and forecasting assumptions about mode share for both passengers and staff;</p>	Autumn 2021
<p>(App 5.3.3) There is a concern that there will be an increase in Road Traffic Collisions as a result of the increased infrastructure and road networks surrounding the airport, that will have an impact on emergency services and WSCC Highways departments.</p>	Autumn 2021
<p>12.4.38 - The assessment of severance based on traffic flow fails to take account of the impacts of changes in the composition of traffic. The criteria for assessment of severance should also take into account the impact of an increasing number of HGVs.</p>	Autumn 2021
<p>Table 12.4.6 Junctions operating over 85% of volume/capacity over an average time period can be very sensitive to increases in traffic volume leading to delays and traffic rerouting. A 4% increase in traffic volume on a link or junction operating at 99% of volume to capacity is likely to have a noticeable impact on users and sensitive receptors as volume would</p>	Autumn 2021

WSSC Issue	When issue was raised
<p>exceed capacity yet the proposed approach would categorise the magnitude of impact as 'low'. The V/C ranges used to classify the conditions at the junctions should be amended to; not significant (<85%), minor (85-90%), moderate (90-95%) and major (95%). This would ensure that changes taking a junction over capacity are either categorised as medium or high.</p>	
<p>12.6.61 - The acknowledgement of the importance of 'push' measures to achieving mode share targets is welcome. Although increasing parking and forecourt charges are stated to have been included in the strategic modelling for passengers, there are no similar measures for staff. GAL should introduce similar measures to support the achievement of staff mode share targets.</p>	Autumn 2021
<p>12.6.62 - There is a gap between the impact of the measures assessed in 2038 and 2047 and the passenger mode share target of 60%. GAL should introduce additional measures to fill the gap between the assessed impact and the mode share target.</p>	Autumn 2021
<p>12.6.62 - The impact of measures on sustainable transport mode share for staff is stated in Appendix 12.9.1 para 7.5.5 to achieve a 47% mode share. GAL should introduce additional measures to ensure the proposed mode share target of 60% is achievable and provide a rationale for the number of staff parking spaces due to be provided and the approach to management (e.g., pricing) of these spaces.</p>	Autumn 2021
<p>12.9.3 - PEIR Chapter 5 Paragraph 5.3.99 states that any construction work in close proximity to existing runways and taxiways would be scheduled to take place overnight. It is unclear how this scheduling has influenced the construction trip generation forecast in Paragraph 12.9.3. Further information should be provided on the assumptions used to assess construction traffic impacts.</p>	Autumn 2021
<p>Appendix 12.9.1, Part 1, 6.1.9 - The demand forecast for 2021 appears overly optimistic. It is unclear what effect this will have on the future forecast scenarios. GAL should revise the forecast to take account of the ongoing impacts of the COVID19 pandemic.</p>	Autumn 2021

WSSC Issue	When issue was raised
<p>Appendix 12.9.1, Part 1, 6.1.9 - Demand forecasting is inherently uncertain and the rate of growth in passenger demand could be higher or lower than forecast for a range of reasons, resulting in passenger demand reaching forecast levels earlier or later. The key assumptions explained in Chapter 4 regarding up-gauging by airlines and higher load factors suggest this is a central forecast rather than a worst-case scenario. GAL should provide an alternative 'high demand' forecast scenario to ensure the impacts of the project are understood in a worst-case scenario.</p>	Autumn 2021
<p>Appendix 12.9.1, Part 1, 6.2.7 - The reporting (Appendix 12.9.1, paragraph 6.2.7) states that "the transport modelling assumes that the distribution of new employment will be comparable to existing employment". COVID-19 has potentially changed where people work/live, which may also influence their travel behaviour, so further evidence should be provided around this assumption and potentially sensitivity assessments should be undertaken to assess a different distribution and travel pattern of employees.</p>	Autumn 2021
<p>Appendix 12.9.1, Part 1, 7.2.2 - The reporting (Appendix 12.9.1, paragraph 7.2.2) has a headline target of "60% of staff journeys to travel by sustainable modes....by 2030", which looks to contradict the modelling results that show "employee mode share by sustainable modes of 36% by 2047". Additional measures should be added to ensure the mode share target is achievable and evidence provided to substantiate the target.</p>	Autumn 2021
<p>12.9.1, Part 1, 7.2.2 - Combining the target for staff sustainable transport mode share with low emission travel initiatives (i.e. zero emission vehicles) will not help to address congestion and also has the potential to abstract investment from initiatives that support sustainable modes of transport (i.e. bus, rail walking and cycling). The target for low emission initiatives should be separated from the target for sustainable modes of transport.</p>	Autumn 2021
<p>Appendix 12.9.1, Part 1, 7.4.1 - The Croydon Area Remodelling Scheme and Lower Thames Crossing are not fully funded or going through the relevant statutory planning process and should only be considered 'reasonably foreseeable' at this stage. As such, and in line with DfT's TAG,</p>	Autumn 2021

WSCC Issue	When issue was raised
they should be removed from the core assessment to understand the impacts of the project without these interventions.	
Appendix 12.9.1, Part 1, 7.6.8 - The reporting (Appendix 12.9.1, Part 1, paragraph 7.6.8) states that "Modelling shows an employee mode share by sustainable modes of 36% by 2047 and up to 43% including car share, comprising 15% rail, 17% bus and coach and 4% active travel". It is unclear whether these mode shares are an input to the model or as an output. Further details on how these numbers are arrived at is required.	Autumn 2021
Appendix 12.9.1, Part 4, 4.9.3 - The generalised costs used in the model were taken from TAG Data Book (July 2020 v1.14 -sensitivity test). The updated transport modelling for the DCO should use the latest available information (currently July 2021).	
Appendix 12.9.1, Part 4, 7.2.2 - TEMPRO 7.2 has been used to produce traffic forecasts but the DfT is due to issue an updated version in late 2021/early 2022. How will this be taken into account as part of the DCO?	Autumn 2021
Appendix 12.9.1, Part 4, 7.2.2 - The assessment does not take into account the site-specific impacts of emerging development sites in the area. There are large strategic development sites, such as West of Ifield, Gatwick Green and Horley Business Park, close to Gatwick that are emerging through the respective local plans. Due to their proximity to Gatwick, these sites will have a cumulative impact on some of the same parts of the network. The cumulative impact assessment should take these sites into account. It is anticipated that the assessment will demonstrate the need to complete the Crawley Western Link Road (CWLR) to provide a through route, including bus priority, between A264 and A23 due to the cumulative impacts of the West of Ifield development and growth at Gatwick. It is also anticipated that further sustainable transport interventions will be needed to provide connectivity between Gatwick and these strategic sites, and to support the achievement of GAL's mode share targets.	Autumn 2021
Appendix 12.9.1, Part 4: General comment - More detailed technical notes on inputs to the strategic model should be provided, specifically on building	Autumn 2021

WSCC Issue	When issue was raised
the base model and demand matrices, forecasting & mode choice assumptions.	
Appendix 12.9.1, Part 4: General comment - Following the officer review of the PEIR, GAL published additional information on the transport assessment (Appendix 12.9.1 Preliminary Transport Assessment Report (PTAR) Part 4 Appendix A: Uncertainty Log). Therefore, additional comments may need to be made (post-consultation) once officers have had the opportunity to review the additional information.	Autumn 2021
Appendix 12.9.1, Part 5, 14.1.3 - The reporting states that "In terms of employees, the strategic model shows that a sustainable transport mode share of 47% is achievable and this would indicate that further measures are required, in particular these could include incentives around EV uptake as well as restrictions on staff parking". This statement appears to be contradicted by Appendix 12.9.1, Part 1, paragraph 7.6.8, which states that modelling shows an employee sustainable transport mode share of 36% by 2047 and up to 43% including car share.	Autumn 2021
Appendix 12.9.1, Part 4, 10.2 Traffic flow change diagrams included in Appendix 12.9.1, Part 4 show differences between 2016 and 2029 and then between 2029 and 2032 and then between 2032 and 2047. There is no comparison of traffic change between 2016 and 2047 therefore the impact on the local road network is difficult to gauge and the true impacts may well be masked. Additional comparisons should be provided to show the differences between 2016 and 2032 and 2016 and 2047.	Autumn 2021
Appendix 12.9.1, Part 4, 10.3 - The Annual Average Daily Traffic (AADT) flows diagrams are for the forecast years only, with no comparison against earlier year e.g. 2016. Comparisons should be provided to show the differences between 2016 & 2029, 2016 & 2032 and 2016 & 2047	Autumn 2021
Appendix 12.9.1, Part 4, 10.4, 10.5, 10.6 - Journey time impacts (Appendix 12.9.1, Part 4, Section 10.4) have been shown for the 2029, 2032 and 2047 forecast years as a comparison between the 'future baseline' and the 'with project' so there looks to be no notable impact. There is no comparison of journey time between 2016 and 2029, 2016 and	Autumn 2021

WSCC Issue	When issue was raised
<p>2032 and 2016 and 2047 so true impacts may well be masked. Comparisons should be provided to show the differences between 2016 & 2029, 2016 & 2032 and 2016 & 2047.</p>	
<p>Appendix 12.9.1, Part 5, 10.7 - As with the journey times the Volume/Capacity (V/C) ratio is shown for the forecast years only with no comparison between 2016 and 2029, 2016 and 2032 and 2016 and 2047 so true impacts may be masked for both road link impacts and junction impacts. Comparisons should be provided to show the between 2016 & 2029, 2016 & 2032 and 2016 & 2047.</p>	Autumn 2021
<p>Appendix 12.9.1, Part 5, 12.2.10 - The reporting (Appendix 12.9.1, Part 5, Paragraph 12.2.10) states that "For HGVs and LGVs, the shift patterns in August 2027 mean that, for the busiest daytime shift, the monthly total construction vehicles are 14,508 vehicles, equivalent to 7,254 in one direction. When divided by 22 working days and spread over a 10-hour shift, the estimated vehicle trip generation" is 33 Light Goods Vehicles (LGV) and Heavy Goods Vehicles (HGV) in and out an hour along the M23 Spur. The robustness is questioned, as there may be nothing to stop more construction trips arriving or departing in an hour period.</p>	Autumn 2021
<p>2.2.8 - It is not clear what design standards have been applied and whether the proposals comply with those standards. WSCC is concerned that the proposals cannot be delivered without departures from standards, which may not be acceptable from a highway safety perspective. GAL should provide a design audit that explains which standards have been applied, compliance with those standards, and identifies the need for any mitigation or departures from standards (which would need to be approved by the relevant highway authority).</p>	Summer 2022
<p>2.2.9 - Although the proposals do not mention changes to speed limits, the assessment of environmental impacts (as shown in Table 3.1.8) appears to assume that the speed limit on A23 London Road would be reduced from 50mph to 40mph. Why has GAL not disclosed the full details of the proposed highway changes that have been used to inform the</p>	Summer 2022

WSCC Issue	When issue was raised
environmental assessment as part of the further consultation? When will these proposals be presented for consultation with stakeholders?	
2.2.9 - The proposed design changes are noted. However, the performance of the proposals has not yet been demonstrated through use of transport models or other suitable tools. WSCC is concerned about the impacts of the proposals on congestion, journey times between Crawley and Horley (including emergency response times) and redistribution effects across the wider network (including moving traffic from the trunk road network on to local roads). GAL should provide transport modelling evidence to demonstrate that in highway capacity terms, the proposals offer an acceptable solution.	Summer 2022
2.3.1 - The proposals have missed potential opportunities to enhance sustainable modes of transport and appear to be relying solely on bus and coach operators to react to demand, rather than proactively identifying investment in shared travel. WSCC is concerned that the proposed mitigation is too focused on providing for vehicles (including parking provision) and that there is not enough focus on sustainable modes of transport, and that, as a consequence, the sustainable transport mode share targets for passengers and staff would not be achieved.	Summer 2022
2.3.2 - South Terminal Roundabout (2): A new drainage pond is envisaged as a permanent feature to the north-east of the roundabout. There may be opportunities to enhance biodiversity through the design, creation, and management of this pond.	Summer 2022
2.3.3 - Land north of the South Terminal Roundabout forms part of the Horley Business Park site allocation. It is not clear whether the proposals align with the emerging plans for the business park. GAL should demonstrate that the proposals will not preclude the development from coming forward in line with the statutory development plan for the area.	Summer 2022
2.3.10 - North Terminal Roundabout (4): There may be opportunities to enhance biodiversity through the design, creation, and management of the proposed new drainage pond.	Summer 2022

WSCC Issue	When issue was raised
<p>2.3.11 - It is mentioned that there would be considerable loss of vegetation from within the highway boundary. Although it is stated that this would be replaced, there is currently no information on how and where. Opportunities to enhance biodiversity should be sought, e.g. the creation of wildflower meadows on subsoil/nutrient poor soil.</p>	<p>Summer 2022</p>
<p>2.3.12 - No traffic modelling has been presented for the traffic signals to demonstrate that three right-turning lanes with one left-turn lane are appropriate. GAL is requested to provide evidence that the proposed lane allocations and queuing capacity at the A23 junction would not result in queuing through the North Terminal roundabout; this would be a highway safety issue.</p>	<p>Summer 2022</p>
<p>2.3.12 -Although the proposed signing for southbound A23 traffic to North Terminal would be via South Terminal junction (as it is today), satellite navigation systems are more likely to route traffic via the A23 Queens Gate junction, as this is likely to offer a better journey time. It is not clear whether the A23 Queens Gate junction would have sufficient capacity to cater for the volume of traffic that would be likely to use it or the impact that these movements would have on other users of A23 London Road, including buses. GAL is requested to provide evidence that the design includes sufficient capacity for traffic to queue at the A23 Queens Gate junction without queuing into the southbound straight-ahead lane (which would be a highway safety issue), and the impacts on journey times (including buses) between Crawley and Horley.</p>	<p>Summer 2022</p>
<p>2.3.12 - The proposed noise barrier between A23 and Riverside Garden Park would be challenging and expensive for WSCC to maintain. GAL is requested to demonstrate how the proposed structure would be inspected and maintained, ideally without the need for lane closures on a busy section of the road network.</p>	<p>Summer 2022</p>
<p>2.3.13 - This section refers to a cycle/pedestrian link between North Terminal and Longbridge Roundabout and a new pedestrian link between Longbridge and Riverside Garden Park. Why is the second of these links not considered for shared pedestrian/cycle use? The more shared routes</p>	<p>Summer 2022</p>

WSCC Issue	When issue was raised
<p>the better in terms of connectivity and promotion of sustainable transport. Another thing to consider is the status of the new routes. For cycles to use a PRow, it would need to be a Bridleway, which would also allow equestrian use. Therefore, are these routes going to be PRow or if simply for cycle use, would they be adopted as formal cycle routes?</p>	
<p>2.3.13 - WSCC is concerned about the deliverability of the proposed carriageway widening over the River Mole as the current structure would not be easy to extend and constructing a replacement structure would require significant disruption to traffic. GAL needs to demonstrate that the proposals are technically buildable in this location and the construction impacts are manageable.</p>	<p>Summer 2022</p>
<p>2.3.16 - It needs to be demonstrated that there is adequate weaving space for traffic joining the A23 westbound, that then wants to u-turn and travel eastbound.</p>	<p>Summer 2022</p>
<p>Speed Limits - London Road (A23) posted speed limit is proposed to be reduced to 40mph. No justification or review against WSCC's Speed Limit Policy has been provided by GAL. WSCC cannot currently agree to such change.</p>	<p>Pre-application TWGs</p>
<p>Stage 1 Road Safety Audit - whilst a Stage 1 RSA of the proposed highway works has been undertaken not all the auditors recommendations have been satisfactorily addressed by GAL in the form of the designers response. This needs to be agreed prior to agreement of the proposed highway works.</p>	<p>Pre-application TWGs</p>
<p>Justification for sustainable transport infrastructure - suitable justification for some of the proposed sustainable transport infrastructure, to ensure it accords the current relevant guidance, such as LTN 1/20, has not been provided and needs to be by GAL.</p>	<p>Pre-application TWGs</p>
<p>Article 2 Interpretation page 6 DCO - a lot is being excluded from the definition of commencement. Main concerns from a transport perspective being (k) receipt and erection of construction plant and equipment, (l) erection of temporary buildings (n) establishment of construction compounds and (o) establishment of temporary haul roads. There is the</p>	<p>Comments on the dDCO (sent June 2023)</p>

WSCC Issue	When issue was raised
potential for a lot of activity which, I assume, would sit outside of the CEMP which would be provided prior to commencement. Seek further clarification on how GAL have assessed these aspects and for their pre-commencement plan.	
Article 6 Limits of deviation page 10 – dimensions in terms of metres needs to be included within the relevant sections. GAL need to advise.	Comments on the dDCO (sent June 2023)
Article 11 Street Works page 13 – the current wording gives relatively far reaching powers. This appears to departs from approaches taken elsewhere, which have specified streets within a schedule rather than just all streets within the order limits. Streets should be specified within a schedule and the changes to the wording of article 11(1) to include wording such as subject to consent of the street authority.	Comments on the dDCO (sent June 2023)
Article 12 Power to alter, layout of streets page 13 – GAL are seeking powers outside the order limits. As per comment above (51) clarification should be provided as to why and what streets.	Comments on the dDCO (sent June 2023)
Article 13 Stopping up of streets – there needs to be wording included to require WSCC's agreement of the temporary alternative route under article 13 (2)(b).	Comments on the dDCO (sent June 2023)
Article 14 Temporary Closure of Streets – need for additional wording in this article in relation to para (5) and (6) to require no street closure until a new temporary street or an alternative temporary route is open. In relation to para (9) WSCC object to the deeming provision within 28 days. Whilst WSCC do not agree with the 28 deeming consent if one is included in the DCO suggested wording should be included requiring the undertaker to inform the authority of the deeming provision when submitted.	Comments on the dDCO (sent June 2023)
Article 16 Access to works – As above, WSCC object to the deeming provision and consider it is necessary to seek our consent and, if needs be, we could have a clause setting out that we would not unreasonably withhold our consent.	Comments on the dDCO (sent June 2023)

WSCC Issue	When issue was raised
Art.17 Classification of roads, etc. - cross reference to the corresponding Schedule is blank, however it is Schedule 7. As per no 66 of this list items needs to be considered and agreed.	Comments on the dDCO (sent June 2023)
Article 18 Traffic Regulation – as above items to be agreed and WSCC object to the 28 day deeming provision.	Comments on the dDCO (sent June 2023)
Article 19 Agreements with highway authorities - WSCC would encourage GAL to agree to a template agreement for all highway works under Section 38 and 278 of the Highways Act 1980	Comments on the dDCO (sent June 2023)
Article 22 Authority to survey and investigate land – deemed consent issue comments as above	Comments on the dDCO (sent June 2023)
Schedule 1 – the highway works set out in schedule 1 (pages 45-47) are clearly to be agreed and there is a need for additional work to address all matters and comments already provided by the Highway Authority.	Comments on the dDCO (sent June 2023)
Schedule 2 Requirement 4 Time Limit – 10 years from order coming into force and commence is considered a long time. Situation and context could change significantly from what is assessed. WSCC would look for a shorter time frame.	Comments on the dDCO (sent June 2023)
Schedule 2 Requirement 6 Highway Works – this requires approval in writing from National Highways. It is not clear why approval is only being sought from National Highways, should it be LPA in consultation with Highway Authorities as necessary.	Comments on the dDCO (sent June 2023)
Schedule 2 Requirement 8 CEMP – no details provided, the Highway Authority will comment as details are worked up by GAL.	Comments on the dDCO (sent June 2023)
Schedule 2 Requirement 11 Traffic Management – should requirement 11 be discharged by the relevant planning authority. Should this read, “approved in writing by the relevant planning authority, following consultation with relevant highway authority on matters related to its function.”	Comments on the dDCO (sent June 2023)
Schedule 2 Requirement 12 Construction Traffic Workers – as above, should this be approved by the relevant LPA in consultation with the relevant Highway Authority.	Comments on the dDCO (sent June 2023)

WSCC Issue	When issue was raised
<p>Schedule 4 Streets to be permanently stopped up – each proposed stopping up needs to be considered and agreed.</p>	<p>Comments on the dDCO (sent June 2023)</p>
<p>Schedule 7 New and realigned classified trunk roads – as per schedule 4 each item needs to be considered and agreed.</p>	<p>Comments on the dDCO (sent June 2023)</p>
<p>Schedule 8 Traffic Regulation – need for these to be considered and agreed. As per WSCC's earlier comments GAL need to provide sufficient justification to support the proposed speed limit changes. For example earlier comments have requested further justification from GAL in relation to the proposed speed limit on London Road to 40mph which has not been received.</p>	<p>Comments on the dDCO (sent June 2023)</p>
<p>Reference T.05.02 relates to Mitigation (entitled Mitigation and Enhancement Measures Adopted as Part of the Project), this is earlier in the list of matters than the assessment of the effects. Would it not be more logical to set out all the assessments matters and then all the mitigation matters? Reference T.05.02 could therefore be moved to come after reference T.09.01 and before all the other mitigation.</p> <p>No section on agreeing the wording of requirements and the Draft DCO. Each matter covering mitigation is quite specific i.e. Surface Access Commitments, Travel Plan, Construction Traffic Management Plan. Given there may be transport related requirements outside of these do we need a specific matter on the agreement of the draft DCO and the wording of requirements?</p> <p>Inclusion of other topics should include, highway traffic modelling approach including software, assessment years, time-periods, scenarios, calibration and validation approach, extent of the strategic highway model network for assessment, baseline traffic survey data, trip generation, distribution and mode share assumptions, Micro-simulation (VISSIM) traffic model of Gatwick Spur, highway mitigation design matters including design review against standards including any departures from standard, Road Safety Audit, proposed Traffic Regulation Orders</p>	<p>SoCG discussions</p>

WSCC Issue	When issue was raised
Waste/Central Area Recycling Enclosure (CARE)	
<p>GAL PEIR documents made ref to demolition of existing CARE facility and a CARE facility, encompassing a new 22m high building and 50m stack. No further details were shared. WSCC response stated that there was a lack of detail about the CARE facility, that has the potential for significant environment effects in it's own right; that the EIA must include full details of the CARE facility; Plume assessments (LVIA).</p>	Autumn 2021
<p>Waste baseline - how much currently managed per annum? What is the waste make up in terms of type (food, packaging, other) and volumes. What is exported (residual waste) for further treatment, recycling or LF? Waste baseline - how much currently managed per annum? What is the waste make up in terms of type (food, packaging, other) and volumes. What is exported (residual waste) for further treatment, recycling or LF?</p>	Comments on the dDCO (sent June 2023)
<p>"Current CARE Facility - How is waste currently managed at the existing facility - processes, technology, heat capture and usage from boiler (water? heating?).</p>	Comments on the dDCO (sent June 2023)
<p>What % of demand for the airport can it supply (heat capture), assuming nothing is exported?"</p>	Comments on the dDCO (sent June 2023)
<p>Waste Forecasts - with and without NRP - have any projections/forecasts been prepared?</p>	Comments on the dDCO (sent June 2023)
<p>How are GAL taking account of Planning Policy related to waste (West Sussex Waste Local Plan, National Planning Policy for Waste, Waste Management Plan for England, guidance, Waste Framework Directive (and waste planning regs), Waste Hierarchy)</p>	Comments on the dDCO (sent June 2023)
<p>How with the proposed MRF work? a. Will all non-food waste will go through it? b. What technology is proposed (manual/automated)? c. What are the expected targets and tonnages for the MRF in terms of recycling, landfill etc</p>	Comments on the dDCO (sent June 2023)
<p>How will the proposed boiler(s) work? a. Can they process more than food waste to recover heat energy from</p>	Comments on the dDCO (sent June 2023)

WSCC Issue	When issue was raised
<p>other residual waste?</p> <p>b. When will the 2nd boiler come online, and how will that work with the existing stack/boiler?</p> <p>c. Could a single boiler be used?</p> <p>d. Could energy be recovered as well?</p> <p>e. How will, and how much heat will be captured by the new CARE facility?</p>	
<p>The Stack is proposed to be 50m - how as its height/width been determined?</p> <p>a. what modelling has been undertaken? What pollutants modelled for any permit? Have HCI, dioxins etc been considered?</p> <p>b. Have discussions or agreements taken place with the Environment Agency?</p> <p>c. Have agreements been made with the CAA regarding having a 50m stack, in terms of safety, lighting etc?</p> <p>d. Have stack heights and finishes been considered as part of the viewpoints for landscape assessment purposes.</p> <p>e. Any assessment of potential plumes and associated visual impact undertaken?</p>	Comments on the dDCO (sent June 2023)
<p>What consideration has been given to emissions to air (in particular from the stack), what pollutant emission limits will apply?</p>	Comments on the dDCO (sent June 2023)
<p>Have cumulative impacts been considered, including from the Permitted EFW at Brookhurst Wood? Have the emissions (NO2) contours from the Brookhurst Wood EFW been considered?</p>	Comments on the dDCO (sent June 2023)
<p>What consideration has been given to alternative waste management methods? For example, could the food waste be sent for composting?</p>	Comments on the dDCO (sent June 2023)
<p>What consideration has been given the potential impacts on the water environment from the storage of waste</p>	Comments on the dDCO (sent June 2023)
<p>What consideration has been given to impacts upon human health, in particular from stack emissions (have UK Heath Security Agency (UKHSA) and Environment Agency (EA) been involved)?</p>	Comments on the dDCO (sent June 2023)

WSCC Issue	When issue was raised
a. How would this feed into the wider assessments and in combination and cumulative effects?	
Will the facility be subject to an Environmental Permit (and will this be an EA or Local Authority regulated permit)?	Comments on the dDCO (sent June 2023)
What consideration has been given to climate change for this particular facility – How would this feed into the wider assessments and in combination effects?	Comments on the dDCO (sent June 2023)
Will the biomass element of the facility be considered a 'renewable energy' and 'low carbon' proposal (i.e. in terms of NPPF as a biogenic waste and replacing alternative conventional fuels)?	Comments on the dDCO (sent June 2023)
<p>How will odour, noise, litter and vermin be controlled at the CARE facility and how will this be assessed?</p> <p>a. Odour will be of particular interest given food waste involved.</p> <p>b. How will received waste managed to minimise odour, would any building have negative pressure/odour suppression systems etc?</p> <p>c. How will waste be stored/transported/contained (sheeted/containerised etc)?</p>	Comments on the dDCO (sent June 2023)
Will the CARE facility have fixed operating hours	Comments on the dDCO (sent June 2023)
Socio-economics	
The baseline data is more than 10 years old in places. There's no read across between the PEIR and Economic Impact Assessment. The employment, supply chain and labour market assessment in the PEIR is based on high-level quantitative data and does not evidence the types of jobs required. Not clear why the Outline Employment, Skills and Business Strategy plan is dependent on the proposed expansion. No reference to the opportunity for growth around international visitor economy, working with local partners and national sector bodies.	Autumn 2021
The assessment of the socio-economic impacts has been from a purely 'numbers-based approach', that is, local planning authorities are planning	Autumn 2021

WSSC Issue	When issue was raised
<p>for houses and, therefore, the workers will be provided . However, this excludes analysis of key issues, such as market signals, affordable housing, or constraints on housing supply. Therefore, GAL's approach is considered to be overly simplistic. Fails to take account of the type and quality of employment being generated (unskilled/semi-skilled/skilled) at the Airport and how this translates into the need for different types of housing.</p>	
<p>There is significant concern regarding the lack of financial support for local authorities and the communities affected. As part of its second runway proposal to the Airports Commission, GAL offered a significant package of financial measures totalling circa £74m to local authorities deliver essential community infrastructure; this included a Home Owners Support Scheme and Local Highway Development Fund, amongst other measures. Therefore, it is questioned why the PEIR only identifies very few mitigation measures for the local authorities and communities adversely affected by the NRP</p>	Autumn 2021
<p>The strategic documents referenced highlight the LEP strategies and work towards local Industrial Strategies. This work is effectively paused, and a Government LEP review is imminent.</p>	Autumn 2021
<p>The geographies used as the 'study area' and 'labour market area' are muddled and not consistent throughout the various documents – the PEIR has the Local Study Area and the Labour Market Area; the Economic Impact Assessment uses the Gatwick Diamond and C2C LEP area.</p>	Autumn 2021
<p>States that the study areas are cumulative, so wider areas incorporate the smaller areas; therefore, clarity is needed on what is being referenced across all reports.</p>	Autumn 2021
<p>This chapter refers to trends in the Local Study Area – however, because this area includes the whole of Crawley Borough and only parts of the other local authorities (Horsham, Mid Sussex, Reigate and Banstead, Tandridge and Mole Valley) the overview is skewed. It would be useful if there was more teasing out of the differences amongst those local authorities</p>	Autumn 2021

WSCC Issue	When issue was raised
there is a need to caveat the use of the Annual Population Survey because the sample is so small and is not robust only indicative of trends and the survey has been undertaken during COVID in a different way to previous surveys	Autumn 2021
There needs to be more around the differences in the trends between the local authorities and the smaller areas of the local study area – as well as the differences in occupations of residents and occupations of workers in the area.	Autumn 2021
reference to other FE/HE provision in the local study area should be considered – Haywards Heath? East Surrey (Redhill) North East Surrey College - Epsom and Ewell?	Autumn 2021
The increase in capacity is also expected to facilitate the growth of freight by 10% in 2029, 27% in 2038/9 and 20% in 2047/48 – is this realistic given that most freight is transported from Gatwick in passenger rather than cargo planes?	Autumn 2021
LVIA	
There is no aspiration or commitment in the PEIR to improve the declining visual landscape caused by the airport activity already in existence. Furthermore, the indicative design, scale, and siting of the proposed development would further damage the landscape. There is concern about the lack of imagination in terms of mitigation and enhancement, as it is only proposed to plant limited areas with vegetation and there will be no landscaping to screen development in the short term	Autumn 2021
PINs question (I.D 4.2.10) - If a visible plume is produced it should be assessed and if a RVAA is undertaken it should be included in the LVIA. GAL state that ' <i>Due to the limited intervisibility of visual receptors within the study area and the very limited number of likely significant effects, there is no requirement for an RVAA. The potential for a visible plume at the CARE facility will be considered during the EIA process and reported, if required, in the ES.</i>	Autumn 2021

WSCC Issue	When issue was raised
How have visible plumes be ruled out if the assessment hasn't been undertaken yet? Further justification for no RVAA should be included in the ES	
The listed topic areas raised during consultation do not include the queries raised by WSCC with regards LVIA methodology (basis for ZTV production) and how viewpoints were identified	Autumn 2021
It is not clear how the early LVIA work fed into the site selection process for the proposed development. How has LVIA work helped guide the location for the construction compounds? The need for a surface access contractor compound on greenfield land north of the A23 Spur is questioned, when the airport has significant brownfield land and existing hard standing available that could be utilised without the environmental damage and disruption this site would cause to nearby residents.	Autumn 2021
There is a strong reliance throughout the PEIR that the maturity of planting will be used to mitigate impacts, although the 'Landscape Design Year' is 2038, there are significant elements of the project where landscape planting proposals will be immature, not just visually, but in ecosystem service provision too. WSCC requests GAL review and present opportunities for substantial advance planting	Autumn 2021
WSCC expects all viewpoints to have photomontages and to be assessed in summer, winter and during the night-time periods.	Autumn 2021
<p>The assessment does not address the visual impact of the 18,000 m² Gatwick Stream Flood compensation area, which appears to excavate the ground level by 3m. Such works would have impacts during construction and on landscaping from these fields, although reference to walkers is made in 8.9.184.</p> <p>The report does not describe the impacts on landscape or nearby sensitive uses for the Peeks Brook Lane road widening, that includes an increase in the height of the bridge. The visual impacts of the junction works for both Terminals need to be fully outlined.</p>	Autumn 2021

WSSC Issue	When issue was raised
<p>It is noted that the PEIR states that the new office configuration, phasing, and floorspace is dependent on the timing of requirements, whereas the timing of the additional hotel rooms would be dependent on commercial need. GAL should clarify why these developments are needed to facilitate the airport expansion and how they are directly linked to it.</p> <p>Assessment of Alternatives - Since the development of the proposals, there have been limited opportunities for stakeholders to influence the design, prior to the PEIR being published. The County Council wants to see further mechanisms to allow the proposals to be understood and scrutinised prior to the DCO application being submitted. Although it is understood that operational and safety considerations are important aspects of design, the PEIR lacks detail on how environmental and social criteria have influenced the decision-making process</p>	Autumn 2021
<p>WSSC wants to see a stronger statement that environmental and social effects have been a key factor in the site selection process associated with airport infrastructure.</p>	Autumn 2021
<p>WSSC understand that safety and operational factors are a driving element of airport facilities, we would expect to see clear evidence of how constraints mapping of ecological/environmental information has fed into the assessment process to choose the most favourable site. How have these criteria been weighted? How have the criteria been chosen? Reference is made to landscape character, but little about visual impact to receptors, including local communities</p>	Autumn 2021
<p>This chapter should outline the justification for the PEIR boundary presented, with the recognition that it is very tightly drawn around the airport boundary. Can this be further detailed within the ES, taking account of any additional required mitigation</p>	Autumn 2021
<p>There is a general lack of evidence around scoring and narrative of risks associated with each option. The Appendix does not give enough</p>	Autumn 2021

WSCC Issue	When issue was raised
evidence, with nearly all stating: 'options would reduce land take and avoid the removal of habitats where possible'.	
Archaeology	
The impact on surviving archaeology within the site of the current airport has not been included within the impact assessment. The only acknowledgement of the Airport itself as having heritage interest is in relation to designated assets. Further assessment is required within the airport boundary itself.	Autumn 2021
Use of the Airports NPS, whilst obviously acceptable as the national methodology, leads to what is considered to be a downgraded assessment system for heritage assets. The assessment methodology also draws upon the Design Manual for Roads and Bridges and its accompanying Environmental Assessment methodology. Only World Heritage Sites would qualify as being of 'Very High' significance under this process, with nationally important sites as 'High' and regionally significant as 'Medium' (or 'Moderate' as the PEIR baseline refers). Locally significant sites are rated as 'Low'. Non NSIP assessment methodology omits the 'Very High' category meaning each class of asset is assigned a higher rating than here. Therefore, WSCC disagree with some of the 'significance' assessments in the Baseline Study, and most of the sites are more important to regional/local commentators, than the assessment process has concluded.	Autumn 2021
WSCC expects to see an Historic Area Appraisal of the airport itself to address the gaps in the baseline study. It is hoped the borehole and geotechnical information that GAL intend to review will be a comprehensive survey; if not, further ground truthing will be required to confirm the archaeological truncation that has been stated has occurred. Absence of this data is a major omission and further consultation on these matters will be required with relevant stakeholders prior to DCO application.	Autumn 2021
Carbon and Climate Change	
concerns about the significant increase in greenhouse gas emissions and impacts on climate change and understanding how airport expansion can be justified in the light of national and international carbon reduction	Autumn 2021

WSCC Issue	When issue was raised
targets (ref to govt ambition of being carbon neutral by 2050). No account of PINs SO comment or cumulative impacts, non-kyoto gases, emissions or arrival flights.	
no ref to the Carbon and Climate Change Action Plan, The Third Climate Change Adaptation Report, the Sustainability Statement, and the Landscape and Environmental Management Plan.	Autumn 2021
(General) It is not clear if account has been taken of the cost of carbon and future abatement measures in the forecasts, which makes them inconsistent with the Government's Jet Zero Policy.	Autumn 2021
WSCC requires further justification that Gatwick Airport does not experience a detectable urban heat island effect. This needs to be presented within the ES.	Autumn 2021
WSCC questions the impact scoring for the In-combination Climate Change Impacts Assessment. For a project of this scale, how can non-significant impacts be assessed?	Autumn 2021
The strategy to include new impermeable areas (road and airfield infrastructure) will reduce additional surface water runoff, thus increasing resilience to extreme weather events in future – impermeable areas are likely to increase surface water runoff, not reduce it.	Autumn 2021
The text states that Low and zero carbon design and performance standards will be applied to new infrastructure. WSCC would expect exemplar Zero carbon design throughout and renewable energy infrastructure as standard, not as mitigation for new development.	Autumn 2021
Climate hazards seem limited in application. High temperature is relevant to airport infrastructure and high winds are applicable to airport operations.	Autumn 2021
Noise	
There is particular concern about the noise impacts associated with construction, given that a large proportion of the works will be undertaken during the night, for up to 14 years, while the Airport will continue to operate 24 hours a day. Local communities close to the Airport, particularly at Charlwood and Horley, are most likely to be affected from	Autumn 2021

WSCC Issue	When issue was raised
this source of noise disturbance and mitigation measures must be employed to reduce these impacts.	
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.	Autumn 2021
Although mitigation measures for those overflown are supported in general, there is concern that the levels proposed are not adequate to minimise the impact on quality of life of those communities that will have increased external noise levels as a result of the NRP. Whether measures (such as those currently included within the Noise Mitigation Fund where criticism is already directed at the process and discharge of funds) are sufficient or will need to be more generous, will only become clearer as the noise impacts are fully understood.	Autumn 2021
The noise and vibration reporting shows that there are some moderate adverse effects in areas immediately to the south of the Airport but these are subject to further study. This assessment should take into account that some of these areas have already been identified by DEFRA as Noise Important Areas.	Autumn 2021
Air Quality	
It is stated that Chapter 12: Traffic & Transport also includes an assessment for 2047. However, air quality is expected to improve in the future and current tools include predictions only up to 2030. 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	Autumn 2021
The Air Quality reporting indicates that there are no significant impacts for construction and operation elements on human receptors and ecological	Autumn 2021

WSCC Issue	When issue was raised
receptors in the forecast years of 2024 (Construction phase), 2029 and 2032. 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	