

GATWICK AIRPORT NORTHERN RUNWAY

HORSHAM DISTRICT COUNCIL'S RESPONSE: DRAFT ISSUES TRACKERS SENT ON 18 AUG 2023

15 SEPTEMBER 2023

SUMMARY OF ISSUES RAISED TO DATE

Socio-economics and Economics

1. Study area does not adequately capture the impact on local authority areas most impacted by the NRP, including the six local authorities in closest proximity to the airport.
2. Labour Market Area is too large to allow local authorities to understand impact on own area.
3. Only a small rural area of Horsham District has been included in the Local Study Area – suggesting it covers six local authority areas is misleading.
4. Gatwick Economic Impact Assessment area has been constrained to reflect the PEIR population and housing study areas, rather than expanding PEIR areas to incorporate the established Gatwick Diamond and Coast to Capital areas.
5. No work has been undertaken by HDC to include growth triggered by the expansion. There are no acknowledgements of constraints on housing supply in the area and further work is required. Water Neutrality has significantly constrained housing delivery in the District. Given the complexities around this issue, projecting forward LPA housing trajectories is likely to be insufficient and not a worst-case scenario.
6. Insufficient acknowledgement of the role that Gatwick will play on driving housing market delivery, and the assessment on transport networks, social and community infrastructure. Further work is required to establish appropriate contributions can be put forward to support local authorities and the impact on local communities.
7. Insufficient information on the types of job provided and how this will impact housing need, especially affordable housing across tenures and the private rented sector. At a minimum, baseline data on the impact of low paid employment growth on affordable housing need is required.
8. Impact of the NRP on property values has been scoped out by GAL, against PINS' advice. In May 2022 GAL suggested a study was being commissioned. This study has not been shared with the local authorities. HDC asks whether this study included commercial property values and affordable housing as requested.
9. Concerns around labour supply and impacts of temporary construction workforce on demand and delivery of local housing and other infrastructure. Displacement of construction workers from local housing schemes may impact housing delivery. Without proper mitigation there may be unwelcome impacts on the housing market.
10. Lack of consistency in approach considering interaction between the NRP and Land West of Ifield housing proposal in the PEIR (i.e. in assessment of the certainty of delivery, a different approach has been taken for the Socio-Economics and transport assessments)
11. Impact on long-term economic development – how are additional jobs assessed temporally – further context is required.
12. No information provided on level of Gatwick Airport-associated employment that currently exists in the District.
13. Lack of mitigation on key transport routes within Horsham District – how this may impact local economy.
14. Promised discussion about the extent of the Local Study Area (TWG 1 May 2022, Slide 9) was welcomed, however engagement has not taken place.

15. Explanation of the calculations for the indirect and induced impacts required.
16. Unclear what is meant by catalytic effects, the assumptions associated with this definition, its baseline position (including future baseline) and what has been discounted to reach a net figure for catalytic effects – these may be overstated. Scenario testing required.
17. Which study areas have been used for the employment impact assessment, and does this include an assessment of employment impacts at the local authority level.
18. Have Trade/FDI impacts been included in the assessment?
19. GAL to confirm study areas for indirect and induced impacts. There is a lack of consistency around how the induced and indirect footprint info is presented on different slides in relation to study areas.
20. Scheme expected to attract new entrants to construction, but where from? Existing skills in local area does not appear to have been undertaken.
21. Unclear how home-based worker split has been reached.
22. Clarification required that the approach to the demand forecasts is a bottom-up market intelligence approach. Further information is requested on the specific assumptions used to derive forecasts. Details of the source for the DfT high and low growth market projections
23. More detailed explanation required of approach to catalytic employment taken.
24. Disagree with GAL's decision not to undertake assessments at a local authority level as will not capture sensitivities or impacts. As a minimum, GAL should assess the local authorities in closest proximity.
25. Distribution of construction workforce has been captured through a Gravity Model (based on distance alone) which is too simplistic. Using either time or generalised cost would be preferable as this takes into account level of connectivity and impact of traffic. Higher concentration of workers, particularly specialised, may exist and this will lead to greater impact on some local authority areas than others.
26. GAL has opted to assess magnitude of impact based on set thresholds. These thresholds are not informed by guidance but decided by GAL and are similar across all receptors, phases and impact areas. This approach appears very simplistic. Whilst we do appreciate the high number of assessments that will be needed, applying the same thresholds to all receptors skew the analysis. For instance, we would expect an increase of 5% in housing demand to be high, not low. On the other hand, an increase of 5% in access to sport, leisure facilities and open space may be considered as low.
27. Clarification of what the "pinch points" will capture in terms of the local authority impacts for the population, housing, jobs and labour supply assessments (particularly for those closest LA areas). Insufficient engagement with the LAs to inform these outputs.
28. Impact on housing does not appear to fully take into account the increased pressure on temporary accommodation created by migration - particularly given existing pressures in local authority areas and that migration is expected to accelerate so may go beyond a temporary constraint. Insufficient engagement with local authorities on figures used to inform housing, hotel, B&B and temporary accommodation assumptions.

Car Parking

1. The Council welcomes clarification as to the number of new car parking spaces proposed through the DCO, as this number has varied during discussions with the Local Authorities, for example there appears to be discrepancy in the figures between information provided for the Planning A and Transport Topic Working Group meetings

that have been held in recent months. The Council considers that all locations within the airport boundary will remain the most sustainable places for airport parking. We reiterate that, in addition to being provided on-airport, any new airport parking provision must be justified by a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport. The Summer Consultation Document provides a high-level overview of parking need associated with DCO passenger growth, but 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. In justifying the level of parking spaces GAL will also need to carefully demonstrate how modal share aspirations will be achieved.

2. Discrepancies between car parking space figures provided in various communications. Detailed Car Parking Strategy required in which GAL demonstrate how a balance is achieved between modal share aspirations, meeting the “sufficient but no more than necessary” parking requirement in the Airport’s S106 legal agreement (Obligation 5.6.1) and deterring unsustainable off airport parking locations, and unauthorised parking. Should include pricing strategy.
3. HDC has had regard to the 2019 Annual Parking Survey that the local authorities adjacent to the airport jointly undertake (the 2019 Survey being the most recent pre-pandemic survey). At the time, this Survey identified that there were 16,508 vacant authorised spaces in total (with 12,070 spaces on-airport and 4,438 authorised spaces off-airport). Additionally, the Parking Survey found that there were 6,644 unauthorised spaces. HDC considers that these findings demonstrate that, despite the large provision of authorised spaces available to airport users, unauthorised car parking facilities still exist. The approach of solely providing additional car parking at the airport fails to properly consider other important factors, such as the implications of pricing in the choices airport users make, again something which could be addressed in a robust Car Parking Strategy. The Council considers that all locations within the airport boundary will remain the most sustainable places for airport parking and all such facilities should be convenient, safe and secure and priced to make illegal off-airport parking less attractive.
4. HDC would be keen to explore the possibility of an annual funding contribution from GAL to support the employment of a dedicated Enforcement Officer.
5. The Council is of the view that the provision of car parking at the airport to meet future demand will need to be carefully monitored and, as part of the Development Consent Order, an appropriate mechanism should be attached to the application to ensure that GAL provides parking only as and when it is required, enabling it to be managed in line with the requirements of the S106 legal agreement.
6. The Council accepts that several of the parking proposals have already been through the EIA screening process with Crawley Borough Council and may therefore reasonably form part of the baseline. However, this isn’t the case for the 2,500 additional robotic spaces being proposed which should be considered as new proposals as part of the DCO. We are therefore of the view that GAL should undertake the necessary screening with Crawley Borough Council to support inclusion of the 2,500 spaces to ascertain whether these qualify as Permitted Development. Otherwise, these spaces should be removed from the baseline.

Traffic & Transport

NB. WSCC Highways comments are also relevant

1. HDC should be invited to participate in Joint Steering Groups to be involved in draft proposals for mitigation – i.e., Local Highways Fund, Public Transport Infrastructure Fund, Active Travel Infrastructure Fund and Local Parking and Traffic Monitoring given the proximity of the District to the airport's boundary.
2. Fundamental questions around assumptions and forecasts which still need to be addressed and clarified (see Section 42 Consultation response).
3. Concerns around rail capacity, particularly given uncertainty around the Croydon Area Remodelling Scheme (CARS) and subsequent impact on road network if rail capacity not adequately considered.
4. HDC have previously requested a focused meeting with GAL's transport consultants and WSCC transport team, to discuss transport modelling outputs and how these relate to the transport network in the District.
5. It is noted that in PEIR Chapter 12, paragraph 12.11.3 "no more traffic at Heathrow" is assumed, should a third runway be built. The Council queried how realistic this is. The provision of a third runway at Heathrow Airport is Government policy and therefore is currently anticipated to be delivered. Whilst the narrative from Heathrow Airport is a "no more traffic" scenario, this is yet to be properly scrutinised through the Heathrow DCO process so it is considered that additional traffic as a result of a third runway should be included in the transport modelling.
6. Lack of consideration given to impacts on the road network beyond the immediate airport boundary (e.g., A264 (including cumulative effects), A24, A29, A272, and rural routes which suffer rat-running as those travelling to the airport by car look to avoid congestion on main routes). Scale of mitigation required around the airport suggests it is unlikely no mitigation will be required elsewhere so concern that this is the conclusion reached by GAL. The use of the M23 Spur for a proportion of final journeys to the airport does not mitigate the use of roads in the wider area for earlier parts of the same journey.
7. Conflict between findings in Horsham and Crawley transport modelling, which shows congestion at J10 of the M23 and GAL's own findings that J9 improvements will lead to a reduction in traffic throughput at J10.
8. In order to reach an informed view, the Council flags the need for following:
 - A draft Transport Assessment, draft Air Surface Access Strategy (ASAS) and Sustainable Travel Plan to be available for comment ahead of the formal DCO application, to include:
 - A core modelling scenario to include all growth likely to come forward (i.e. West of Ifield, Horley Business Park etc.) by way of a 'worst case scenario' that takes account of cumulative impacts, transparent assumptions and appropriate sensitivity tests
 - A clear breakdown and analysis of existing and proposed staff and passenger car parking respectively, including the nature of provision and relevant charging / restrictions
 - A strategy for reducing off-airport parking
 - Confirmation of mode share targets, and the impact these will make against a 'business as usual' scenario
 - A strategy to achieve those mode share targets, including consideration of maximising opportunities for connecting new growth areas and existing populations

to the airport (for example new multi-mode link from A264 to A23 i.e. the Crawley Western Link Road)

- A package of funded mitigation improvements that go well beyond just on-site / spur road highways and other improvements, worked up in collaboration with local planning authorities
 - Presentation of the above in a non-technical summary report.
9. Insufficient consideration has been given to future proofing active travel connections outside the core scenario, for instance, to the West of Ifield development.
 10. GAL has not proposed any local bus enhancements for Horsham District, including upgrades to existing local services. This is disappointing considering the proximity of many parts of the District to the airport. More detail required on the coach route proposed between Worthing and Gatwick, which would pass through Horsham.
 11. None of the mitigation discussed in the Summer 2022 Consultation Document is contained within Horsham District. However, it is noted that a significant amount of additional capacity is being created with extra lanes, through road widening schemes and new flyovers, amongst other interventions. Whilst these proposals are designed to mitigate the traffic impacts immediately around the Airport, it is not clear at this stage what consideration has been given to mitigation beyond its immediate vicinity. Clearly GAL anticipates a significant increase in traffic volumes accessing the Airport to justify such significant road improvements and it is therefore logical to conclude that adverse impacts may be experienced beyond the immediate locality into adjoining local authority areas, such as Horsham District, including key connecting routes and more rural roads.
 12. HDC has raised a number of comments in relation to Traffic and Transport issues and at this stage it is difficult to see how GAL is planning to respond to this feedback. Much of the focus for the discussions on Surface Access mitigation is on the immediate impact on and around the Airport, with little acknowledgement of the wider transport impacts beyond the immediate airport. GAL is projecting a significant uplift in passenger throughput which will have implications for travel within the District, particularly given the potential for in-combination effects as a result of planned and potential further development. For example, the A264 is an important east-west route connecting Horsham with Crawley, the A24 to the west and the M23 to the east, and forms an important part of the road network providing forward destination links to and from the Airport.
 13. Concerns around the cumulative effects on rail services in the District with an uplift in passenger numbers using the services on the Arun Valley Line which travels through the District including connections between Horsham and Crawley. This part of the route, especially, has the potential to see increased passenger numbers from identified nearby development in the north of the District in-combination with the Northern Runway Project.
 14. The Council notes that the highway network flow changes as a result of the NRP in 2047 have been assessed against the 2047 BAU with the majority of impacts found to affect the M23 and M25. It is further noted that no adverse impacts have been identified on the A24 or any other routes in Horsham District. The Council considers that this approach does not highlight where there are existing capacity issues. If junctions are already congested in the BAU scenario, then the impact of the scheme will be constrained by the limited capacity for traffic to grow. The Horsham Transport Study (2021) highlights that there are a number of junctions along the A24 where there are capacity issues which will be exacerbated by further development. It will be important, therefore, for GAL to provide

details of which junctions are congested in the BAU scenario. Whilst the Council does not expect GAL to solve existing problems, it is necessary for GAL to demonstrate that there is adequate capacity to serve the NRP and would not lead to problems for existing users and / or overload existing infrastructure. In these circumstances, the Council will expect adequate mitigation to address any adverse impacts of the scheme.

Planning

1. HDC has requested that GAL share the two elements of the Future Baseline (Future Air Traffic Forecasts and Future Baseline Developments) before submission of the DCO application.
2. Lack of information and clarity re: Need Case, Demand Forecasts and Capacity Assessments and a number of other issues being requested by York Aviation, on behalf of the local authorities, since Autumn 2021 and which are still to be fully addressed to the satisfaction of the local authorities.
3. Further information and justification of the approach to the Associated Development and the need for and provision of additional hotel and office space as part of the Project (and what is needed for development outside of the DCO). In the Planning TWG 4 held on 23/11/22 GAL's slide deck indicated that *"the delivery of new hotels and offices is not necessary as a source of additional revenue for the applicant"*. However, when HDC queried this, GAL confirmed that these new facilities would result in additional revenue for GAL through commercial leasing arrangements. Greater clarity around all of these issues is required.

Cumulative Effects Assessment

1. Confusion, lack of transparency and lack of consistency in the way sites have been assessed in the long- and short-list for the CEA, and then how these have been included in the assessments on topics themselves i.e. West of Ifield is not included in the Core Transport Modelling Scenario but is being relied upon as a location in the labour catchment area to serve the development.
2. 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. Conversely, Land West of Ifield is included and the draft Horsham Local Plan (Regulation 18 version, February 2020 – Strategic Site Option 5) is referenced. GAL should note that these sites were originally included together and referred to as "Land West of Crawley" in the Regulation 18 at the time (not to be confused with the Homes England broader strategic opportunity area). For the Regulation 18, Land West of Kilnwood Vale was originally identified as being able to deliver 800 dwellings but this has now been reduced to 350 dwellings in the draft Local Plan published for Cabinet in July 2021. As GAL will be aware the Regulation 19 did not progress to full Council. The Council remains of the view that Land West of Kilnwood Vale should be included in the CEA along with Land West of Ifield.
3. Continuing lack of clarity as to how the strategic site allocation Land North of Horsham has been treated by GAL in the CEA (this is a site which has outline planning permission

plus a number of reserved matters). It is very important that this site is included in the CEA given the potential for in-combination effects of this site, together with the Kilnwood Vale development site plus the Land West of Ifield and the NRP, should they proceed. There is specific concern in relation to the highway network and the impacts on the A264 and adjoining roads within Horsham and Crawley. It should also be noted that the site promoters for Land North of Horsham have proposed that the density of the site (within the consented red line boundary) could be uplifted by a further 500 dwellings and this was identified in the Council's Cabinet papers for consideration of the draft Regulation 19 Local Plan which was subsequently withdrawn prior to full Council. This uplift would thereby increase the scale of the development and the potential for adverse cumulative effects – can GAL please confirm that Land North of Horsham will be assessed based on 3,250 dwellings (the consented 2,750 plus the densification of 500 dwellings proposed in the emerging Local Plan)?

4. Cumulative effects of the project and other developments on the foul water network and potable water supply, especially given rezoning water supply areas is a possibility being considered to address the water neutrality issue.

Carbon and Climate Change

1. Airport expansion will require capacity restrictions elsewhere to reach carbon reductions necessary to achieve balanced pathway. Emissions budget likely to be lower than assumed in PEIR. There has also been no consideration of proposals to increase capacity at other airports as part of airspace modernisation review.
2. Aviation emissions should be reported in CO₂e and not reporting in this way means global warming effects are underestimated.
3. The suite of factors being considered to reduce aviation carbon emissions should include more emphasis on demand management and not rely solely on technological solutions.
4. The mitigation covered in the PEIR is high level, with a note that further analysis will be undertaken in the ES, with a Carbon and Climate Change Action Plan in development. This means there is very little information on mitigation for local authorities to scrutinise in terms of effectiveness and whether mitigation can be demonstrably secured.
5. No indication that local authorities' own climate change action plans have been taken into consideration, or that any work has been undertaken to align GAL's plans with locally set targets and to provide synergy between local plans and targets and proposed mitigation.
6. Will there be a carbon model produced for the airport capturing data from all operations and journeys?
7. Will GAL be reporting GHG emissions for the opening year, peak and worst-case scenarios, in line with the Airports National Policy Statement (ANPS)?
8. How will GAL demonstrate that any increase in carbon emissions will not materially impact "the ability of Government to meet its carbon reduction targets, including carbon budgets" as required by the significance test set in the ANPS.
9. Does GAL intend to model different GHG emission scenarios so the impact of the NRP can be understood in the event of new technologies not being implemented and government policy not being met, given the reliance on new/emerging technologies for decarbonising surface access transport and aviation?

10. How will GAL ensure airport operations are zero emission by 2040, particularly given there is uncertainty around the exact scope of 'airport operations' in Jet Zero?
11. What assumptions are being made after 2040 on modelling of aviation emissions, i.e. on the uptake of electric aircraft for domestic flights?
12. What measures are GAL putting in place to future proof the NRP for the expected increase in demand for sustainable aviation fuels (SAFs) by airlines using the airport? What assumptions are being made about the use of SAFs? Could there be a cost premium on their use?
13. How will surface access emissions be monitored in the future and what mitigation plans are in place if these emissions exceed targets?
14. What active travel assumptions are being made about surface access journeys?
15. What sensitivity testing has taken place to model different levels of uptake of low and zero emissions vehicles?
16. What provision will be made for EV charging?
17. How will GAL model emissions from construction to ensure these do not exceed estimates?
18. GAL has acknowledged some, albeit limited, influence over modes of vehicular access to the airport. Arguably GAL has as much, if not more, influence over SA emissions than on aviation emissions. What targets, monitoring and remedial actions will be taken (i.e. physical or behavioural) if targets are not met?
19. How have changes in routes and subsequent aircraft size changes been accounted for?
20. Disappointing that local authorities have not had sight of the CAP before submission. This has limited the opportunities for consideration and discussion.
21. Has freight transportation been considered, not just staff and passenger emissions as mentioned under umbrella of surface access?
22. Is GAL considering offsetting surface access journeys like other airports?

Land & Water

1. Given GAL's confirmation that the change in runway utilisation to exceed 55 movements per hour means the WIZAD route will be used more frequently, any impact of increase overflight will need to be assessed as part of the Landscape Townscape and Visual Impact Assessment (LTVIA)
2. What will impact of aircraft be on tranquillity on Land North of Horsham and West of Ifield sites and other existing public open spaces in the District? Have these been identified as receptors and has mitigation been proposed?
3. GAL's response re: Water Neutrality and the Natural England Position Statement has been noted, however the situation is a developing one and we request that GAL undertakes careful and continued assessment of the implications of these unique circumstances on the NRP.
4. What flood risk mitigation is taking place outside of the NRP site boundary, particularly upstream. How will this be synergised with potential mitigation strategies on nearby developments like Land West of Ifield?
5. The IROPI case in the ES must demonstrate adequate compensation measures to mitigate all impacts on priority species and habitats, not just significant ones.

6. What opportunities are being taken to conserve biodiversity and geological conservation interests, in line with ANPS para 5.91 and Horsham District Planning Framework Policy 31?
7. What consideration has been given to Local Wildlife Sites, other irreplaceable habitats and the Nature Recovery Network? What buffer zones will be put into place and how will habitats be joined up? Detail should be included in a Landscape and Ecology Management Plan (LEMP) for local authority comment.
8. Bat activity data should be added to any assessment of Important Hedgerows in line with other NSIPs. Lighting design should consider landscape/ecology elements of the ES and embed these in the LEMP.
9. Further detail on BNG should be provided. How have stakeholders been engaged? Can GAL demonstrate they have met Schedule 4 of the Infrastructure Planning (EIA) Regulations 2009 in delivering reasonable opportunities to deliver environmental benefits?
10. What is the final location of the CARE facility and the justification for its location?
11. Viewpoint 18, which was subsequently excluded from the ES assessment, was shared with the Council's Senior Landscape Architect, who suggested views from north of the river (as opposed to east of the watercourse as in Viewpoint 18) would be wider with greater opportunity to see the development. Can GAL please respond re: why views from north of the river were not used? Is the CARE facility, in particular, the flue, confirmed as not being visible from VP 18?
12. HDC concerns around the cumulative effects of the Project and other planned development on the capacity of the Crawley Wastewater Treatment Works and evidence of liaison with Thames Water regarding this issue
13. GAL has shared that there will be an expected 13% increase in flights using the WIZAD route. This route affects smaller settlements in the district, including Rusper and Warnham as well as the north and east of Horsham town. 13% is considered to be a significant increase in overflight. What other assessments (i.e. Heritage) are being undertaken to understand the increased impact and identify necessary mitigation? Further clarity is also required around the Baseline and With Development scenarios and how GAL is treating the increase in WIZAD traffic under both scenarios.

Noise

1. Noise impact should be considered at day as well as at night, although increase sensitivity at night time is acknowledged.
2. Mitigation and compensation for properties affected by noise resulting from the NRP is necessary. This should be considered separately to the noise envelope.
3. Report issued to local authorities before submission was, in GAL's own words, to support the creation of a noise envelope, not a final report for local authorities to comment on. Question whether the correct process has been followed. Discussion with local authorities has been limited to TWGs, with issues raised in the PEIR still outstanding.
4. Unclear what criteria GAL will use to determine the suitability of the noise envelope and how this conforms to the NPPF, ANPS and Noise Policy Statement for England (NPSE).
5. Government expectation is that noise envelope benefits should be shared between the aviation industry and local communities. The benefit of quieter aircraft to local

communities will not be realised if it is interpreted as an opportunity to increase the number of flights.

6. PEIR references to fleet mix are out of date.
7. A number of metrics should be employed, to form a suite to identify items to be monitored and reported against. Primary metrics should be those with national/international standards against which airports are judged and which are, therefore, likely to impact operation. Secondary metrics should be these which inform noise control and are produced for information. Under an appropriate review mechanism it should be possible to escalate or relegate metrics between primary and secondary. HDC has provided further detail on specifically which datasets should be monitored, verified and reported and which should fall within the primary or secondary metric categories.
8. N-above contours N60 and N65 should be given equal importance, as well as average sound levels Leq 8 and 16 hr respectively.
9. Request that a review of predicted vs. actual noise contours should be undertaken, and published, annually.
10. The structure for monitoring of the noise envelope and approval of any reports needs to be agreed.
11. Publication of material needs to be confirmed and agreed.
12. Metrics should not only be shown for increase in capacity following implementation of NRP but should also include the cumulative effect of existing and new runways against the 2019 baseline. This is to include sensitivity testing of the 2019 operations utilising 2029 fleet.
13. Clarification required on what triggers an extraordinary review of the noise envelope. This was discussed broadly at TWG on 4/1/23 but answer was not given.
14. Will structures for oversight of the noise envelope include local authority representatives and will any expenses be covered by GAL, included appointments for independent advice?
15. Where there is dispute what will resolution process be, what will structures and mechanisms be? Maybe a case for GATCOM, local authority or another party to facilitate this.
16. What is process for enforcement against noise envelope breaches, notwithstanding the preventative nature first and foremost?
17. In addition to using average values for noise the impact of individual events on communities as this is how they are experienced need to be clearly informed.
18. Re: ANCON noise modelling, given that monitoring and not certification data is used, how is the reference curve used for validation derived? Is it affected by Noise Abatement Departure Procedures for aircraft? Is additional monitoring needed to confirm model performance for the proposed 51dB contour?
19. More information required on WIZAD usage. Previously noise contours showed an increase in the N60 compared to the baseline. Will N60 contours be provided as part of the increase WIZAD route activity?
20. Air Noise Assessment Methodology uses a population metric to define significant impacts, based on criteria used in the Heathrow Airport PEIR. This is not considered a valid comparison, given the rural, less populated character of the District, and it minimises the absolute magnitude of impact.

21. Community groups have suggested a noise metric which measures the magnitude and frequency of impulsive noise should be included in the noise envelope, which the Council supports. We suggest N60 and N65 should be further considered.
22. The use of awakening information needs to be presented (baseline vs future total effects).
23. There is concern that development will increase in road traffic 'spillage' from the main highways to the side roads and country lanes for airport trips. Even though the total noise will not be comparable to the main roads, the increase can be large and proportionally more disturbing due to its close proximity to residents and that it is made up of multiple 'events' rather than a general "hum". An assessment should be made of traffic flows on local roads and how this traffic is associated with Gatwick and how it can be mitigated. Receptor points on the local road network should be agreed with local authorities to establish the impacts.
24. There is a disconnect between the expansion proposed at both Gatwick and Heathrow Airports and the potential implications of airspace change that will take place as a result of FASI South. GAL has concluded that cumulative noise assessment cannot take place for the health and wellbeing impacts, however, the Council considers that this approach is insufficient. GAL have stated that if new routings become available before the DCO submissions that these will be considered, however this should be assessed during the examination process where the information, even if indicative only, exists.
25. The modelled noise contours need to be expanded to include lower thresholds to allow consideration of total adverse impacts on the population. The noise and track keeping monitors should be increased to allow refinement of the model to lower sound levels and to provide for characterisation in those areas where no monitoring occurs presently but which will be affected by increased usage, including, but not exclusively North Horsham.
26. Diurnal pattern of flights during different periods is not clear therefore impact unclear.
27. All metrics to be presented on 100% Easterly and Westerly modal split for metrics (including Leq and Nabove) to show how noise will be experienced.
28. Information required on the total effect of all noise on residents.
29. As a minimum extent the noise insulation scheme should be based on the boundary of the single mode contours.
30. A mechanism for linking slot release and slot management to aviation noise impacts to manage and reduce exposure to aviation noise.
31. Overheating assessments need to be performed for properties that will benefit from noise insulation and where necessary additional adaptation provided to deal with this issue (at the cost of the airport).
32. Health cost calculation needed to using the latest health data in an enhanced webtag for all noise sources.

Air Quality

1. Robust Air Quality Mitigation Plan required to offset emissions. Detailed content should be agreed, such as cost of proposed measures, indicative emissions reduction likely to be achieved particularly for operational phase.
2. Previously agreed 500m screening from arterial roads. It is unclear what methodology was used in the ES as no details were given in Appendix 13.4.1: Air Quality Assessment Methodology.

3. Acknowledge that predictions for 2047 would be uncertain but this is not justification for no 2047 assessment having taken place. This should be provided in the ES. If this is to exclude road traffic then a 2038 scenario, excluding road traffic, should also be modelled to allow the change in airport concentrations to be examined.
4. Request for monitoring (i.e. dust, NO_x, PM, UFP). No clarification yet on what monitoring is planned. Unclear if high risk areas have been identified for dust during construction phase. No commitment to install monitoring in event of complaints from residents re: dust. On airport monitoring is welcome but should not be at expense of off-airport monitoring using improved techniques and located at relevant receptors. Concerns over use of solid state sensors for long term airport monitoring, which are not approved for use on the national network, remain.
5. Further information required on the assessment of potential health impacts of UFPs as a result of NRP.
6. Local authorities have agreed for the road traffic element of the Transport Analysis Guidance (TAG) damage cost approach for calculating damage cost (rather than Sussex Air Guidance), but damage cost has not been provided.
7. No written confirmation provided by GAL or Natural England that NE have accepted GAL's approach to the HRA.
8. No written confirmation provided by GAL or Natural England that NE have accepted GAL's approach to assessment of ammonia emissions.
9. No written confirmation provided by GAL or Natural England that NE have accepted GAL's approach to nitrogen deposition calculations where concentrations do not exceed 30µg/m³.
10. While source apportionment (airport and non-airport) on model receptor points has been agreed in principle, GAL have yet to confirm that this is to be done for receptors provided by local authorities which were missed at PEIR stage but agreed on 28/8/19.
11. Agreed on metric for airport emissions performance but local authorities have not yet seen any of the results, despite being assured this would be included in the PEIR.
12. Regarding model verification, Appendix 13.6.1: Air Quality Data and Model verification is missing details on how model verification factors were established – information required on Monitored Road NO_x Contribution versus Unverified Modelled Road NO_x, which monitoring sites were used, and which were removed from the verification process.

WIZAD and Airspace Change

1. GAL continues to refer to no new flightpaths as a consequence of using the Northern Runway and that the wider FASI-S changes are not required to enable dual runway use. The Council is concerned that there is no acknowledgement of the inevitable interaction between airport growth and airspace changes. Realising the overall growth in aircraft movements envisaged, particularly when taking growth at other airports across the south of England into account, will necessitate changes to airspace as part of the modernisation process. NATS are clear that FASI-S is required to enable growth through the London airspace system. GAL should acknowledge this overall dependency.
2. The increased use of the WIZAD route will result in increased overflight of Horsham District. FASI-S could itself be a driver for greater use of WIZAD.

Other

1. Proposals put forward by GAL to the Airports Commission work up to 2015 for additional runway capacity in the South East of England are relevant to the consideration of the NRP, these included £46.5m to help local authorities deliver essential community infrastructure, engagement charter to support local landowners and businesses affected by the proposals, Community Flood Risk Forum, £10m Local Highway Development Fund, extension of the Noise Insulations Grants Scheme, among others. The Council has significant concern that the NRP proposals contain no comparable (and proportionate) mitigation offer.
2. Should the DCO be granted, HDC requests that GAL commits to limiting the airport to a two-runway operation allowing safeguarded land to be released and agree to a voluntary cap on passenger throughput in order to manage impacts on the health and wellbeing of communities affected by airport operations.