



MOLE VALLEY DISTRICT COUNCIL

RESPONSE TO GAL'S DRAFT ISSUES TRACKERS

ISSUED ON: 18 AUGUST 2023

18 SEPTEMBER 2023

The following issues are raised as those either not being included within the Issues Tracker prepared by GAL, or to indicate where Mole Valley District Council does not consider a sufficient response to an issue, has been made. As such, all those comments raised below remain unresolved/unclear.

Historic Environment

Issue
Heritage implications for air noise on listed buildings and methodology issues. The Council does not agree with GAL's interpretation of Historic England's methodology and considers that GAL should consider the 90 or so heritage assets within our district under sensitivity Category D.

Landscape

Issue
The viewpoints/photomontages and illustrative material are important for assessing the impact of parts of the NRP upon Mole Valley residents, some of which live only several hundred metres from key parts of the project. The most likely parts of the NRP to visually impact Mole Valley residents are: the decked car parking buildings, Central Area Recycling Enclosure (CARE) building (option 1, GAL's preferred option in light of consultation feedback) and new North Terminal buildings. MVDC are still seeking confirmation as to whether a candidate view point over Charwood has been determined as a result of the submitted proposals of the DCO and that any additional field surveys etc. have been carried out.
Clarification sought that Surrey Hills is covered in the tranquillity assessment and that sufficient account has been had of the proposed amendments to the boundaries of the AONB as published in early 2023. The LVIA should have regard to this.

Water Environment

Issue
Visual evidence has shown the water level just a few inches below the bridge suffit at Longbridge. When raised the response from GAL officials given to MV was that the peak flow rate to the River Mole pre and post construction will remain the same but the discharge will be for a longer period of time. GAL suggested that was therefore most unlikely that the water will overwhelm the bridge. However, concerns are raised that GALs suggestion will only stand if there is no obstruction to the flow within the watercourse downstream of this area. Can GAL confirm how this possibility has been dealt with during the hydraulic modelling phase?

Traffic & Transport

These issues should be read in conjunction with any input/response from SCC as the Highways authority.

Issue
GAL are proposing 1100 parking spaces, this follows a change since the Summer 2022 Consultation (down from 4200 spaces). However there is no evidence to justify how this projected need from the NRP has resulted in this 1100 figure.

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.

The council is of the view that a mechanism is required to ensure that the amount of parking provision on-airport is provided only when it is needed, and this must be monitored, therefore enabling it to be managed in line with the requirements of the S106 legal agreement. Whilst it is appreciated that an element of flexibility is required by both GAL and the Local Authorities to ensure 'sufficient but no more' parking provision, GAL's wide-ranging permitted development rights provide significant scope for new parking coming forward on airport without the need for planning permission. The principle of waiving or capping GAL's parking-related permitted development rights as part of a DCO related S106 was suggested. The Council welcome GAL's willingness to discuss options, with possible mechanisms including a 'requirement' on the DCO or an obligation within the S106 legal agreement. We note that in this event, GAL would retain the option to apply for planning permission, thus enabling new parking proposal to be assessed in light of a demonstrable need and within the context of the sustainable surface access strategy.

Improved bus and coach provision is needed for early morning and late-night flights, especially if considering increasing forecourt charges when there are no other options for accessing the airport at these times. Proposed provision is insufficient.

With so much of the NRP hinging on the success of the Gatwick Rail Project, it is expected that accompanying Rail Strategies and plans be more detailed and demonstrate deliverability. This is not currently the case.

While improvements are welcomed, the capacity of Rail Services remains a concern for the council, especially given the issues with the Selsdon Junction and funding issues with East Croydon Station upgrades. Further detail and more deliverable assurances and actions are needed to understand how GAL proposes to ensure services are enhanced to serve the NRP.

Air Quality

These issues should be read in conjunction with any input/response from joint local authorities (particularly Reigate and Banstead Borough Council) who have worked collaboratively on air quality matters to pool specialist knowledge.

Issue
General concerns remain around how AQ levels have been assessed and will be monitored, how and what mitigation will be funded, and the general impacts on communities. More detail is needed and the Council will continue to raise necessary issues and engage throughout the examination process.

Noise and Vibration

These issues should be read in conjunction with any input/response from joint local authorities who have worked collaboratively on environmental health matters to pool specialist knowledge.

Issue
Sensitivity and environmental assessment of the impacts of FASI-S should be undertaken to ensure due consideration is given to the cumulative impacts (or not) of both projects.

The sharing of data is welcome and helpful but not all data requested has been shared in particular single mode contours.

The Council has raised issues through TWG's that in order to prevent and minimise ground noise and air noise impacts on communities to the North, any Northern Runway usage needs to be limited to operations between 07:00 to 23:00 and only be used during the day for Chapter 3 aircraft or quieter. GALs submission suggests that this has been resolved through Requirement 19(3) of Schedule 2 to the draft DCO (APP - 006).

MVDC remain unsure whether, as worded, it is sufficiently protective.

Sensitivity testing of different growth rate scenarios would help provide a better understanding of how noise may affect local communities in future. It had been expected that this sensitivity testing would be provided in the ES.

While GAL considers that this has been addressed, MVDC does not agree and slow case transition is unacceptable. There is no adequate comparison of future technology gains on the 2019 baseline i.e. noise levels are assumed to be constant within the fleet over the coming 10 years.

Local authorities have requested an 'Over-heating Assessment' to demonstrate adequacy of the ventilation scheme. This hasn't been provided and the effectiveness of blinds etc. and the level of air changes provided are still not suitably considered against climate implications.

The noise envelope thresholds are not agreed. In particular, using the slow transition case as the basis of the noise envelope rather than the more likely central case fleet provides limited incentive on GAL to achieve a faster fleet transition and secure noise benefits.

It has been suggested that the following will be discussed with the Noise Envelope Group:

- Details on how the benefits of new aircraft technologies are shared between the applicant and local communities should be provided;
- Expected that a mechanism is adopted to allow for further reductions in the contour area limits to provide further community benefits with technology improvements in the future;
- Information should be provided in the noise envelope on what actions would be taken in the event of an exceedance of the noise envelope limits;
- Details on the enforcement regime should be provided;
- More detail on how potential compliance with contour limits will be achieved would be beneficial and help provide reassurance that exceedances of noise contour limits can be avoided;
- Existing restrictions on night flights, would expect to see these explicitly defined in the noise envelope;
- Recommended that consultation is undertaken with local communities and relevant stakeholders to discuss the contents of the noise envelope;
- Discussions should allow the opportunity local communities and relevant stakeholders to submit recommendations for noise envelope contents to GAL.

GAL has deferred these matters to discussions with the Noise Envelope Group. This is insufficient and relates to other concerns around sensitivity testing.

Noise envelope design process did not follow best practice guidance set out in CAP1129 or good practice from other airports. We would have expected local authorities and stakeholder groups to have been involved in the envelope design team from the outset and prior to the statutory consultation in September 2021 with the process examining all noise envelope options, metrics and limits from a first principles basis. The CAA recognises the potential need for independent, technical advisory third parties to assist stakeholders to reach agreement, but there was no such involvement at Gatwick. Luton and Heathrow, other airports to have carried out work on noise envelopes, set up independently chaired and advised, well-resourced, multi-stakeholder groups.

The noise envelope group set up following consultation should have had an independent chair rather than being chaired by an airport employee. This would have given greater confidence in the process to community and local authority stakeholders.

The proposed monitoring, review and enforcement of the noise envelope is not agreed. We would like to see an environmentally managed or ‘mitigate to grow’ approach to implementation and enforcement (as was being developed by Heathrow for its R3 DCO and proposed by Luton in its Green Controlled Growth Framework). There should be 5 yearly or less reviews of the noise envelope built into the process once the DCO is made. A first review of the contour 9 years after opening or when 382,000 ATMs is achieved again provides limited incentive on GAL to achieve a faster fleet transition and secure noise benefits.

Socio Economic

These issues should be read in conjunction with any input/response from joint local authorities and appointed consultants who have worked collaboratively on matters to pool specialist knowledge.

Issue
Concerns remain over the baseline/modelling data, scenario and sensitivity testing etc.
Concerns remain over the stated national and wider economic benefits of the scheme and the extent to which these are accurate or conflated.

Cumulative Impacts

Issue
FASI-S is a project that will have a bearing on the implementation of the DCO. The option and available data should be more readily considered in scenario testing. Draft options are due to be publically consulted on before hearing sessions commence and implementation of FASI is due in 2027. These two projects cannot be disaggregated.