

Attachment 1

MID SUSSEX DISTRICT COUNCIL COMMENTS ON ISSUES TRACKER ISSUED BY GAL 18 AUGUST 2023

General Comments

In the time, since acceptance of the DCO application, it has not been possible to undertake a comprehensive review of the submission documentation, therefore it may be the case that issues have been addressed by GAL but just not recorded in the issues tracker.

- It would be a more user-friendly format if the trackers were combined into one document.
- It would also be useful to note which local authority or authorities made the comments. This will enable authorities to track their issues and also identify which areas are common. This would allow information to be easily transferred into Local Authority based SoCGs (if that's the approach taken to SoCG by the Examining Authority).
- it would be beneficial to have some supporting text to explain how the matter raised has been considered, rather than just a signpost to where GAL considers issue to be addressed. GAL's approach of signposting to other documents does not provide meaningful explanation or address concerns raised and is inadequate.
- There needs to be space in the tracker for LAs to provide their response i.e. current status of issue (in the LAs opinion)
- In response to the Section 42 consultation MSDC submitted five detailed reports relating to Socio- Economic, Air Quality, Climate Change, Noise and Vibration and Traffic and Transport. There are many detailed points in these reports that are not reflected in the Issues Tracker. There is no clear and specific evidence that GAL has responded to the questions and points raised prior to submission of the application. The Council requests that GAL update the tracker to include the matters raised in the above reports, so it is clear how matters have been responded to.
- In response to the Focused Consultation held in Summer 2022, the Council submitted a detailed response. It is not clear from the Consultation Report how these matters have been addressed by GAL. The Council requests that GAL update the tracker to include the matters raised in the above reports, so it is clear how matters have been responded to.

During its engagement in the pre- submission Topic Working Groups, the Council provided written feedback to GAL. Many matters raised have not been included in GAL's Issues Tracker. We therefore request that the following issues are included.

CARBON AND CLIMATE CHANGE

No issues tracker for this topic has been produced. The written comments provided by AECOM are reproduced below. It is acknowledged that some of these questions may have been answered by GAL in its DCO application documentation, but it would be helpful to all parties to have a clear understanding of how and where the matters have been addressed. (In the time available it has not been possible to review the submission documentation).

When raised with GAL	Issue not recorded in Trackers
TWG 1	Calculating and reporting GHG emissions from an airport project should be undertaken in line with ANPS. The approach taken by GAL therefore complies with expected approach for assessing GHG emissions.

	Can GAL confirm they will be reporting GHG emissions for the opening year, peak and worst-case scenarios in line with the ANPS?
	How will GAL demonstrate the significance of emissions from NRP will not be 'so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets, including carbon budgets?
	Given the uncertainty around government policy(i.e. due to the reliance on new/emerging technologies for decarbonising surface access transportation and aviation) does GAL have any intention of modelling different GHG emissions scenarios so that the impact of the NRP can be understood where new technologies are not implemented, and government policy is not met?
	While there is still uncertainty as to the exact scope of what is included in 'airport operations' in Jet Zero (Jet Zero places a requirement for airports to be zero emissions by 2040), what is GAL going to put in place to ensure its airport operations are zero emissions by 2040?
	Has GAL any plans to reduce residual emissions from Airport operations?
	Given the uncertainty around electric and hydrogen aircraft, what assumptions will GAL make when including these in your modelling?
	What assumption for demand management will GAL make in their aviation modelling?
	Jet Zero anticipates a significant increase in the use of Sustainable Aviation Fuels.. What measures are GAL putting in place as part of the NRP to future proof the project for the increased uptake of SAFs?
	How does GAL plan to monitor emissions from surface access journeys in the future?
	What plans does GAL have in place if emissions from surface access journeys are exceeded?
	How is active travel being built into the transport GHG emissions forecasts?
	Will any sensitivity testing be undertaken to model different levels of uptake of low and zero emissions vehicles.
	What provision is GAL making for electric vehicle charging?
	Will any sensitivity testing be undertaken to model different levels of uptake of low and zero emissions vehicles.
	What is being assumed around the use of SAFs? Could there be a premium on cost from using SAFs?
	Why is the assessment over surface access considered to be limited? There is an argument that the airport has more control over surface access than say aviation.
TWG 2	Can GAL confirm how they identified the assets to be assessed as part of the climate change resilience assessment?
	What design life is being considered for the assets to be included in the assessment? Will different design lives be considered for different assets?
	To what extent have GAL considered existing assets as part of their assessment?

	Can GAL confirm where they sourced the criteria to assess the 'consequence' of climate change impacts?
	Does the consequence criteria align with GAL's approach to assessing the consequence of climate impacts (Climate Change Adaptation Progress Report, GAL, 2021)?
	Only the environmental impacts of climate change have been considered as part of the assessment. Should the social and economic impacts of climate change also be considered as part of the assessment?
	Will any sensitivity testing be undertaken on the impacts of increased heat on the efficiency of aviation? When temperatures rise aircraft require more fuel to operate, particularly to take off.?
	How has the choice of sites been arrived at for the Urban Heat Island Effect assessment?
	The slide presented shows past temperature data for Crawley is to be confirmed. How will this be confirmed for the Environmental Statement?
	When considering the future baseline is a 1 in 100 year event of 38 degrees C too low? We are seeing this being regularly exceeded in recent years. It is stated that Europe is heating at twice the rate of the rest of the world.
	Extreme weather events will impact procurement/supply chains, staff availability and potential security. How will this be taken into account as part of the assessment?
	Physical assets are to be assessed for CCR. Will necessary <i>processes</i> also be assessed, eg ability of staff and passengers to access the site if there is disruption of any type?
	Will social and health impacts of a climate stressed planet affecting operations be assessed?
	What will be done to provide a more realistic forecasts, especially in view of use of Representative Concentration Pathway 8.5 which assumes minimal reduction in global emissions, approaching 5 Celsius increase and an unliveable planet by the end of the century?
	Is 2060 the only scenario date? Should a midway assessment be provided at, say, 2040?
	The PEIR says that the ES will keep non-Kyoto emissions assessments under review. What is the current state of this review? This should consider that nitrogen oxides have powerful radiative forcing effect over the initial 20 year period – which is of most concern – even if a later period mitigation effect may come into play.
TWG 3	It would be good to understand how far the CAP goes to meeting net zero operations by 2040.
	Have has the transportation of freight been considered? Only passenger and staff emissions were mentioned under surface access.
	What measures are GAL putting into place to future proof the airport for electric/hydrogen aircraft?
	What is GAL doing to decarbonise the existing building stock?
	Other airports are considering offsetting surface access journeys. Why is GAL not considering this?

TWG 4	What IEMA guidance is used for the assessment.
	Is GAL looking at the combined impacts of climate change and other impacts for example will the combined impact of climate change with airport quality impacts from aircraft require preconditioned air in the new Pier 7?
	Will the London Overheating Hierarchy Guidance or other guidance be used as part of the assessment? Are measures such as the use of louvres on the outside of buildings being considered? This is a key issue to limit need for mechanical ventilation and reduce energy use.
	Surprised that only 2 significant risks have been identified as part of this assessment. Would have thought that increases in temperatures would have an impact on both construction workers and airport operatives. As a 24 hour business the airport does not have flexibility to work around the weather.
	Will a draft version of the Climate Adaption Strategy be shared with the group for comment?

Air Quality

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

Noise and Vibration

When raised with GAL	Issue not recorded in Trackers
S.42 PEIR Response	That GAL provide clarification over the modelling and undertake further scenario testing as described above in addition to any other scenarios arising from discussion with the local authorities.
S.42 PEIR Response	GAL is required to adopt the proper process as set out in CAP 1169 to set an appropriate scheme for a noise envelope. In this GAL is to include the Joint

	Districts and Boroughs as well as the West Sussex County Council and the Surrey County Council.
S.42 PEIR Response	It is recommended that the environmental assessment is updated to take account of likely or actual changes to airspace or options that are proposed by FASI.
S.42 PEIR Response	Where, due to timings, the Noise Action Plan cannot be replaced immediately, the new plan will need to run concurrently with the extant plan.
S.42 PEIR Response, Summer Consultation July 2022 Response	Concern regarding the potential use of Gatwick Goods Yard for aggregates and the potential for noise disturbance to residents, particularly at night.
Summer Consultation July 2022 Response	The increase in capacity at Gatwick will mean routes not previously used frequently would experience significantly more air traffic than at present. The council is aware that significantly greater use of WIZAD, for example, will be required to achieve the suggested hourly movement rates both with and without increased use of the Northern Runway and this would need to be aligned with FASI-S and potentially require to be assessed against the CAP1616 criteria for airspace change, as required by PINS in the Scoping Opinion.
AoC Appendices	Modelling 2019 ATMs with 2032 fleet technology.
AoC Appendices	Forecast single mode for future years.
AoC Appendices	Annual and summer contours should be provided to monitor growth outside the summer period (as requested by PINS)
Position Statement March 23	It is also unclear how the noise envelope relates and works with other regimes e.g. DfT night flight noise regime, landing fees and charges and the Noise Action Plan required under the Env Noise (England) Regulations 2006.
Position Statement March 23	Need for further scenario testing including 100% Easterly and Westerly modal split for specific years comparison of the difference between what the noise would be now with current aircraft fleet, ie modelling future fleet mix at current movement levels, the cumulative impact of additional night time awakenings for the location.
Position Statement March 23	Compensation for residual impacts remain to be negotiated.
Position Statement March 23	Noise impacts of construction, including material supplies not well understood.

Position Statement March 23	To prevent and minimise ground noise and air noise impacts on residents any Northern Runway usage should be limited to operations between 07:00 to 23:00 and is only used during the day for Chapter 3 aircraft or quieter - [NB The effect of this proposal on other routes based on future operations needs to be determined]
Position Statement March 23	Requirement to understand fully the implications of the potential greater use of WIZAD including establishing background levels now as LAeq as well as Lmax events in those locations to demonstrate.
Position Statement March 23	Means of governance and scheme of regulation for the noise envelope, control of ground noise, construction noise etc. and expectations over enforcement incl. funds required for local authority oversight and enforcement.

TRANSPORT

Mid Sussex reverts to comments made by West Sussex County Council, as Highways Authority on transport matters. However, Mid Sussex District Council has made specific comments in its consultation responses and through the Topic Working Groups that have not been reflected in the Issues Trackers.

When raised with GAL	Issue not recorded in Trackers
TWG 1 and 3	<p>Provision of choice of sustainable transport modes from villages in north Mid Sussex – Crawley Down and Copthorne. In order to provide residents in northern Mid Sussex, a real choice of sustainable transport modes and reduce the reliance on the private car further investment in bus connectivity is required.</p> <p>This is particularly important when relying on these areas for labour supply and taking into account the unsociable hours that many roles within the airport have. Local bus enhancements should be sought on routes in these areas to provide fast and frequent direct service to Gatwick.</p>
TWG 1 and 3	<p>GAL need to prepare a robust Car Parking Strategy that links with the overall Transport and Sustainability strategies. This is in order for GAL to be able to demonstrate a justified need for the level of parking provided.</p> <p>There is an ongoing pressure for off site airport parking by other airport parking operators. What is the evidence that providing more on site parking will reduce this pressure.</p>
TWG 3	<p>Bus Strategy – lack of improvement to services in rural areas of Mid Sussex, acting as barrier to mode shift.</p> <p>Where rail links do exist at Haywards Heath and Burgess Hill, connections to neighbouring settlements is poor acting as a barrier to use. The current strategy therefore risks leaving large parts of the district which is geographically very close to the airport, with no realistic alternative to car travel.</p>

	Mid Sussex council would therefore like to understand the potential impacts of introducing bus priority measures and/or an extension to the Fastway service along the A264 corridor and would strongly encourage undertaking feasibility and modelling work to quantify what impact these interventions could make to support mode shift to sustainable travel, as currently presented the strategy overall appears to not be sufficient to achieve the mode share targets.
TWG 3	Concern is raised regarding the target for staff sustainable transport mode share with low emission travel initiatives (i.e. electric vehicles), this will not relieve issues with congestion and could risk investment being directed away from more sustainable modes such as bus, rail, walking and cycling and should therefore be separated from the target for sustainable modes.

SOCIO ECONOMIC

The Council has only provided summaries of issues raised at the 5th and 6th (final pre-submission) TWG's for this topic, as it considers these were the most recent submission to GAL but not included in the Issues Tracker. We request that GAL revisit matters raised at previous TWGs to ensure all are captured in the Tracker.

TWG 5	Induced effects of construction employment - assume there will be an assessment of induced economic activity associated with construction in the ES. Need clarity on reasons for this as typically induced effects are taken account of as part of socio-economic work.
TWG 5	Labour supply - SE lower than average share of workers in infrastructure and because of decline in infrastructure out put there is unlikely to be a shortage in labour supply. Given large proportion of Gatwick jobs are likely to require skills which are interchangeable across several industries and based on projected increase in total output, this would suggest local labour available for scheme maybe more limited.
TWG 5	New construction labour - Assumption that there will be new entrants to construction, is the applicant going to be identifying where these entrants will be coming from. Not specific about where these are coming from. No analysis of existing skills in local areas has been undertaken to inform this analysis
TWG 6	Population and Housing Report - Impact on housing does not take full account of increased pressure on temporary accommodation created by migration. This is too large to capture impacts at a local authority level. How will local authorities understand the extent of impacts on their areas?

TWG 6	Population and Housing Report - What data sources are being used to assess hotel, B+B and temporary accommodation capacity
TWG 5	Gravity Model testing/calibrating and Results - 100% home based theoretical example assuming all construction workers are home based (90 mins). Theoretical breakdown of where these would be based. Gravity model captures distribution of construction work force. It is not clear how numbers have been split by locality, types of workers based in different localities and whether there would be sufficient supply of labour to fill these positions
TWG 5	Demand by occupations - sets out potential demand for occupations from project. No further information about where potential employees for these occupations would reside. Have info by LA in other places so why not here.
TWG 5 and 6	Travel to work data is pre – covid. Based on GAL’s update, it confirms that the extent to which Covid-19 implications have not been considered and that no update of the data will be made prior to submission. Suggest that GAL should be updating TWT data.
TWG 6	We understand what the applicant’s study areas are but don’t fully agree with the rationale for selecting these study areas. The applicant has not considered sensitivities or capturing impacts at individual local authority level. Therefore, this assessment falls short in identifying how the scheme will impact on receptors within specific local authorities. At the minimum, why is it not possible for the applicant to focus on an assessment of effects for those local authorities in close proximity to the scheme?
TWG 6	Assessment of induced effects of construction employment - In the workshop, Applicant said it didn’t make sense to do this. We will need further clarity on the reasons for this as typically induced effects are taken account of as part of socio-economic assessment work.
TWG 6	The applicant confirmed that the analysis on the availability of construction workers considered the split by local area. However, there is no breakdown provided of where different workers are based locally and no further details have been provided on this. As such it remains unclear how this work links into the socio-economic assessment. In conclusion, it is difficult to understand whether there is currently an available pool of workers in the local areas to meet the employment demand from the scheme and whether there will be constraints placed on local labour supply. With regards to new entrants to

	<p>construction, is the applicant going to be identifying where these entrants will be coming from?</p>
TWG 6	<p>At a previous workshop there was a presentation of a theoretical exercise with an assumption that 80% of construction workers were home based (within 90min of the airport) and 20% were non-home based (NHB). The applicant confirmed that the 20% NHB assumption was informed by the Gatwick construction team – function of the contracting (contractors for some of those things will come from other parts of the country). They argued that there is a lot of construction workers and specialists living in the area given the location of Gatwick - unlike Hinckley Point, for example, which had a NHB worker ratio of 64% (highly specialised infrastructure and located in a rural area). It is still not entirely clear that this assumption is based on actual evidence/data and it would be helpful if this were confirmed. At the minimum, and alongside the information from the construction team, we would have thought the applicant could demonstrate some appropriate comparators to further justify the 20%.</p>
TWG 6	<p>the applicant confirms that they are not projecting that the supply of infrastructure labour will fall but that the CITB is projecting demand for infrastructure labour to fall. The point made by AECOM on Slide 52 from the previous presentation, that whilst the projection for infrastructure output is showing a decline, the “total” output (last row in the table) is showing an increase over the same period. The applicant’s response does not address this question. Given the nature of the skills required for the Gatwick scheme, the majority would be applicable across multiple sectors, not just infrastructure. Therefore, it is questionable whether the demand of labour relevant to the Gatwick scheme will actually fall as suggested in Slide 52 (previous presentation).</p>
TWG 6	<p>Distribution of construction workforce by local authority has been captured through a Gravity Model (function of labour supply by travel zone and distance from the site). The model distributes/allocates workers between the zones based on distance alone. It is not clear how this distribution between each zone is made. The use of distance from the site as primary criteria for allocation of construction workforce seems very simplistic and would assume that all zones in the 90-min area have a similar proportion of construction workforce. This is unrealistic and there needs to be a further granular assessment</p>
TWG 6	<p>Due to the number of receptors, phases and impact areas, the applicant has opted to assess magnitude of impact based on set thresholds. These thresholds are not informed by guidance but</p>

	<p>decided by the applicant and are similar across all receptors, phases and impact areas:</p> <ul style="list-style-type: none"> • Up to 1% change: very low magnitude of impact • 1% to 7.5% change: low magnitude of impact • 7.5% to 15%: medium magnitude of impact • Over 15% change: high magnitude of impact <p>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.</p>
TWG 6	<p>From what we understand, the study area for the socio-economic assessment is the Labour Market Area. This is too large a study area to appropriately capture impacts at a local authority level. How will local authorities (particularly those in close proximity to the scheme) understand the extent of impacts on their areas?</p>
TWG 6	<p>We understand that outputs for population, housing, jobs and labour supply will be presented for each scenario at local authority level in an appendice to the Population and Housing Report. There is mention of local pinch points, with that in mind can you clarify to what extent there will be interpretation and analysis of these outputs at a local authority level particularly for those authorities located in close proximity to the scheme. Can you also confirm how will this be taken account of to inform the socio-economic assessment given this is being undertaken at a larger study area level. Could you also confirm the extent to which you have engaged with local authorities to inform these outputs?</p>
TWG 6	<p>Additionally, the impact on housing does not appear to fully take into account the increased pressured on temporary accommodation created by migration. This is a particular issue in some of the local authorities which currently have a very high number of people in temporary accommodation / hotels, with current provision low due to high pressure from migration which will place constraints on this type of accommodation. Given migration is projected to accelerate this may go beyond being a temporary constraint.</p>
TWG 6	<p>please could you clarify what data sources are being used to assess hotel, B&B and temporary accommodation capacity</p>

<p>TWG 6</p>	<p>We understand the applicant will present the outputs for the HMA (but not LPA area, as there are too many of them) at next meeting. Outputs at LPA level will be calculated but won't be shared with LPAs before the DCO submission. Whilst presenting all outputs for all 17 authorities is helpful, there is a need to demonstrate that key issues/pinch points/constraints within local authorities are sufficiently taken account of particularly those authorities in close proximity to the scheme. Please can you clarify how you will provide reassurance that locally specific issues within these areas have been appropriately taken account of.</p>
<p>TWG 6</p>	<p>ARELS said that airport-related land requirement to 2038 is in the order of 16-17 hectares in the base case scenario, increasing to 35-39.5 hectares with the Northern Runway. Therefore, 19 to 22.5 hectares of airport related land requirement is attributable to the Northern Runway. Slide 45 then states that of the 19-22.5 ha, around 15-18 ha could be attributed to off-airport requirement, equivalent to less than 1 ha per annum potentially across the ARELS FEMA. It is unclear how it was estimated that 15-18ha could be attributed to "off-airport" requirement and what "off-airport" means. The airport-related land requirement will cater for hotels, industry and warehousing (cargo, freight, airline catering, maintenance, distribution and logistics) as well as office. It would therefore be reasonable to assume that all that land requirement will be needed in immediate proximity of the airport. Therefore, there would still be a requirement to deliver 35-39.5 hectares of airport-related land in and around the airport by 2038 (and not 15 to 18 ha within the entire FEMA as slide 45 seems to suggest). Slide 46 suggests that one of the next steps will be to verify whether there is a current and forecast surplus or shortfall in space, identified employment land allocations and the availability at certain sites within the FEMA. This verification should be done at a more local level, where land will be required (rather than the FEMA level). As well as making the identification of suitable land more challenging, the concentration of activities around the airport will result in a concentration of the impact more locally (note: partially included but not specific issue).</p>