

Mole Valley District Council – Relevant Representation

1.0 Introduction

- 1.1 Mole Valley District Council (MVDC, or ‘the Council’) acknowledges the Secretary of State’s decision (3 August 2023) to accept for examination the application for the Northern Runway Project (NRP) made by Gatwick Airport Limited (GAL, ‘the Applicant’) for a Development Consent Order (DCO). The Council requests that it is registered as an Interested Party (IP) for this process.
- 1.2 This Relevant Representation (‘Representation’) sets out a summary of the Council’s views on the submitted application but should not be taken as an exhaustive list of the Council’s concerns which are likely to evolve over the duration of the examination. This Representation should be read in conjunction with:
- The Council’s individual and joint Section 55 Adequacy of Consultation Representation;
 - The responses of strategic partners, such as Surrey County Council (e.g as the Highways Authority); and
 - The Council’s Principal Areas of Disagreement Summary Statement (PADSS)

2.0 Socio-economics

Need

- 2.1 The Council has already raised concerns about the validity of the Applicant’s claims regarding the scale of economic and employment benefits of the scheme. The Council’s view remains that the proposals lack a clear and justified base case for need and expansion.
- 2.2 The national and local economic value of the NRP remains insufficiently evidenced and needs to be more robustly tested for the net benefits and suggested demand in a realistic context. Such forecasts and assumptions must account for other similar projects taking place such as at Luton and Heathrow, where the potential for growth also exists and where demand can be met, thus depleting the unmet demand which can be claimed by GAL. The Applicant’s case essentially considers the NRP and the airport in isolation of other material and essential considerations including airspace change, other airport expansion and wider market share. The result is that the demand for the NRP is overstated and significant aspects of the proposal are skewed in favour of the application. This includes the limit size of the noise contour in the Noise Envelope which has been set too large and provides no effective control or incentive to reduce noise levels at the airport.

Capacity

- 2.3 The technical capacity of the NRP is questioned and it is not currently possible to accept that all departing aircraft can be safely or reasonably achieved within the proposed take-off and landing windows. This view is informed by the fact that while the NRP will enable both runways to be used for departures, the separation between the two runways, even after modification, will be such that they are treated as a single runway in terms of the airspace

(Paragraph 4.5.9, APP-245). The Council is concerned that the gains in flight movements are somewhat overstated and could result in cumulative delays to flights over and above the forecasts. It is noted that the airspace change programme could assist with this but, to date, the Applicant has not sought to accept the linkages between the change programme and the NRP in any tangible ways.

- 2.4 Full modelling of the interaction between the use of the two runways and the respective departure routes needs to be undertaken and the delay information provided at a sufficiently granular level (hourly) to enable the delays to be properly understood and the capacity attainable validated.

Economic Strategy

- 2.5 While seeking to justify the case for need and claiming economic benefit, the Applicant has missed the opportunity for innovative and more far-reaching economic and employment support to the local area beyond Horsham and Crawley. The Employment, Skills and Business Strategy (ESBS) (Environmental Statement Appendix 17.8.1, APP-198) for the NRP is based upon reasonable objectives and themes, but lacks 'SMART' focus. It sets out hypothetical outputs which arise from arguably undeliverable interventions and is not currently considered to demonstrate a realistic strategy for improvement.
- 2.6 The Council notes that in some instances it promotes current 'business as usual' initiatives, such as those already required by Environmental, Social and Governance commitments (ESG), as a benefit of the NRP which is misleading. The Applicant should make it clear what is already happening and what 'additionality' will happen only as a result of the NRP for public benefit in order to show transparency.
- 2.7 The Council would expect to see more details of deliverable and realistic activities and initiatives linked to people living in each local authority. The baseline should also aim to identify specific minority and/or marginalised groups of people and communities as well as pockets of deprivation so that these areas can be targeted, where possible.
- 2.8 It is necessary to understand more about funding and how potential partners and local authorities will be expected to support GAL in the absence of any financial support from the airport. So much of what the Applicant is proposing will be reliant on partners and authorities and is undeliverable without them. It is expected that the S106 will account for this (at the very least), but there should be information which the Applicant already holds and has considered as part of the development of its plans.
- 2.9 Primarily, the ESBS is based upon on what could be done/achieved and not what will. The strategy is not supported by clear costings or resourcing considerations, which again lessens confidence that the outputs are achievable and otherwise essential to making the NRP successful.

Local Plans

- 2.10 The Council does not consider that the most up to date Local Plan position and information for Mole Valley has been had regard to. An outdated position for the emerging Mole Valley Local Plan exists within the Environmental Statement (ES) on Population and Housing Effects (Appendix 17.9.3, APP-201). MVDC completed the public hearing stage of its examination by the end of October 2022, and revised trajectory and land supply information was available to

the Applicant to consider as part of the DCO submission within a more than adequate timeframe.

- 2.11 While the details are unlikely to make a material difference to the submitted DCO in their own right, inaccuracies for other authorities should not be ruled out and could necessitate changes. The Applicant should review the details and accuracy of the ES and correct relevant details which will have informed modelling and forecasts for housing and population data.

3.0 Noise

- 3.1 The Council considers that the proposal will adversely affect residents of Mole Valley and beyond due to an increase in exposure to aircraft noise during the day and night. The Council disagrees with the Applicant's interpretation of national policy in respect of aviation noise and this affects the approach and work which has been carried out by GAL to support its application. Concerns relate, but are not limited, to:

- the derivation of the proposed noise envelope limits;
- the identification and extent of various insulation zones (areas requiring mitigation measures);
- the approach to future mitigation and management of aviation noise, particularly at night and in the period from 06:00 to 07:00hrs;
- intrusive adverse noise impacts from ground operations and taxiing movements; and
- embedded issues with the consultation process with the community and local authorities which has resulted in poor understanding and engagement on noise envelope constraints and technical detail.

- 3.2 It is considered that the quantification of the impacts set out by the Applicant does not take into consideration the cumulative impacts of the different types of airport-related noise that have been modelled independently. This includes the combined effect of Gatwick's predicted baseline growth and the Northern Runway on awakenings (being woken up at night by aircraft noise) and the difference in the absolute sound levels within the district as a result of the NRP, which may also change over time.

- 3.3 Despite requests to do so, the Applicant has refused to provide any data that will help explain how people will actually experience the sound, for example the single mode contours.

- 3.4 The Applicant places an overreliance on limited metrics to describe and put controls on sound. The Council's view is that a range of metrics, stated for different periods, are needed to understand effects upon appropriate areas and the mitigation required. The Council also considers that there has been insufficient regard of the means as to how likely future policy changes might be taken into account in the management of air noise which could be pertinent to what can be implemented.

Noise Envelope

- 3.5 There are significant concerns in terms of the approach taken to Noise Envelope (NE) (CAP1129) matters and the process for the creation of a NE has not sufficiently involved the local authorities or the community groups nor has it been adequately explained.

Furthermore, it has not properly taken into consideration views presented through the pre-application stage and consultation. In short, despite comments, advice and questions, the Applicant has chosen the worst environmental options which is likely to have the largest environmental impacts as the basis for the NE leaving too much scope for detrimental outcomes.

- 3.6 The Council has observed that in the case of the Luton airport expansions project (PINS Reference: TR020001) there is an agreed process which is managed by the Environmental Scrutiny Group and requires that discussions which determine NE matters should be independently chaired by a suitably qualified person from within the UK aviation sector. It also requires that they should have agreed mechanisms to challenge forecasts and validate modelling and measurement processes and that all costs should be funded by the promoter. This has not been the case with the NRP.
- 3.7 The Council considers that the Noise Envelope, as presented, is not fit for purpose because it provides little incentive to stabilise noise levels let alone reduce them. It provides no adequate review and control mechanism or local accountability and no meaningful penalties or sanctions if there is a failure in compliance.

Construction and Noise Insulation

- 3.8 The Applicant does not justify or detail how construction will be scheduled to ensure the impact of noise on residents is mitigated during the build-out phases. For example, the noise barrier to the west of the runway is to be removed whilst construction proceeds and the runway will continue to be operational without any suitable mitigation. This will have significant impacts for Mole Valley residents and no details have been offered in relation to:
- the duration and magnitude of the noise impacts while the barriers are removed; and
 - no information has been provided on the design and performance of proposed barriers that will be constructed.
- 3.9 The NRP places an undue reliance on Significant Adverse Observed Effects levels and the Section 61 process to manage construction noise impacts. There needs to be more information to assess the likely duration and provide suitable mitigation and monitoring of specific adverse noise impacts from construction work at sensitive locations where extended periods of disturbance are to be reasonably anticipated.
- 3.10 It is recognised that the Construction and Transport Management Plans will be essential to understanding the mitigation of impacts and that these would be forthcoming at a later stage. However, it is considered that draft management plans should be collaboratively prepared with local and highways authorities and commenced swiftly so that the information is available for consideration during the examination. Should the DCO be approved in the absence of management plans, implementation could fall short of what is necessary and appropriate.
- 3.11 The Applicant's proposals for mitigating aircraft noise overly relies on the noise insulation of properties. The proposals are too narrowly defined and should not solely be based on Leq. The extent of the noise contours, which would enable decisions to be made on whether

someone qualifies for financial assistance for sound insulation measures, should be based on single-mode contours and not standard-mode contours as the Applicant proposes.

- 3.12 Noise insulation will often result in properties having to have sealed windows and/or relying on mechanical ventilation, such as air conditioning. Therefore, the Applicant must make provision for overheating assessments and related mitigation works to properties due to the increased risks that this will occur. Given the duration of the project and the magnitude of harm from the high levels of intrusive noise, the ventilation requirements should be assessed in accordance with the changing future climate circumstances which are likely to exacerbate the risks of overheating further and must be recognised now, as far as is practicably possible.
- 3.13 Given the various negative impacts, the Council is concerned that there is no offer of compensation for people affected by the nuisance they are likely to experience for which they would otherwise have common law rights to apply for.
- 3.14 Fundamentally, the Council lacks confidence in the Applicant's plans to deliver and implement a meaningful noise control regime that takes into account the needs of the local communities. This view is informed by the Applicant's ineffective consultation process and the challenges MVDC faced when trying to work proactively with the Applicant on noise-related matters.

4.0 Air Quality (AQ)

- 4.1 The Applicant has provided insufficient information to detail how the health impacts from increased levels of air pollution have been calculated across the population as a whole. Longer term modelling at the end of and beyond the construction phase would also be of benefit to ensure a full understanding of likely impacts arising from operational, air and road-related activities.
- 4.2 Furthermore, despite the significance of understanding costs in order to mitigate impacts, there is no suitable consideration as to the financial implications of identified impacts. Nor is there any information on how said costs will be shared, through mitigation mechanisms, with the wider community once they have been determined. While the presence of cost analysis is alluded to (Appendix 13.3.1, Table 2.1.1 and 13.12.6, (APP-038, APP-156 and APP-042)) and supposedly detailed in Chapter 17, these are absent from Chapter 17 and not clearly and robustly set out. As such, it is the Council's view that health impacts from air quality implications have not been sufficiently addressed and the submission documents are misleading.
- 4.3 The Council would also like to raise concerns that it is not confident in the monitoring mechanisms that would need to assess change in AQ levels over time as air traffic movements increase/alter. Monitoring is an essential mechanism that can enable authorities and the airport to respond accordingly for the benefit of communities and public health. It is essential that there is confidence that proper monitoring mechanisms and indicators are established at the outset and reviewed as necessary.
- 4.4 While it is acknowledged that the Applicant has committed to addressing impacts, monitoring and mitigation through s106 mechanisms, this is considered to be too late and needs to be understood more thoroughly upfront. The Applicant is yet to provide any type of construction-related management plan, including that which is related to dust. Neither has it

carried out effective ultra-fine particle assessments, which are relevant and a likely air quality impact to Mole Valley communities. Ultra-fine particles are not just likely to stem from aircraft, but also traffic and construction processes and the assessment and mitigation must be addressed where necessary.

- 4.5 Ensuring management plans are shared and scrutinised, at least in draft, as well as a complaints policy and monitoring strategy is essential and needs to be resolved as part of ongoing discussions. Should the DCO be approved, in the absence of such management plans, implementation could fall short of what is necessary and appropriate.

5.0 Biodiversity

- 5.1 The Council's comments regarding biodiversity should be read alongside those of Surrey County Council's ecology specialists which MVDC support.
- 5.2 In addition, the Council welcomes the ambitious Biodiversity Net Gain (BNG) target (22.5%) set out within the examination documents. However, the Council would like to seek clarity on:
- long-term maintenance arrangements for Church Meadows;
 - further information regarding on habitat trading and what options were considered and discounted when arriving at the conclusion that GAL would not be able to meet Habitat Trading standards; and
 - information on the extent to which land beyond the NRP boundary was considered for improvements and biodiversity enrichment, as well as opportunities for better design through landscaping.

6.0 Climate Change and Greenhouse Gas Emissions

- 6.1 The Council has been unable to determine if the full suite of emission generating-building works and longer-term upkeep and replacement has been accounted for within the presented emission forecasts. This should include the emissions which will be generated by all proposed buildings (including new hotels and offices) not just those relating to the immediate airport and passenger terminals etc. The Applicant needs to clarify this matter to provide assurances that calculations are not capturing only half of the story. If full audit has not been made, then work should be carried out or a clear justification provided.
- 6.2 Regarding carbon calculations, the Council appreciates that the national position and research regarding climate change and greenhouse gases is a moving feast. However, for the benefit of robustness, the examination should require an update on cumulative effects regarding climate implications when considered against the newest PAS 2080 standards (April 2023). This information was available prior to submission and regard should have been had. Other more recent standards and publications may also be relevant to any update.
- 6.3 Furthermore, the Council remains unconvinced that the baseline position and approach to considering climate/carbon impacts is robust when considered against both the Jet Zero publication and the national targets for zero carbon. There is some sympathy for the Applicant in that the Government has not always been clear on potential conflicts between the two matters but the Council considers that the Applicant has not gone far enough in its assessments to give confidence that the climate impacts of the NRP will be as are depicted, or accord with the government agenda.

- 6.4 The NRP places great weight on new technologies and fuel types as the basis to justify its case in terms of emission and environmental impacts. Yet, there are no guarantees that these technologies will materialise, or that the airlines with the ability to use them will operate out of Gatwick. In addition, there is insufficient regard to the cumulative impacts of wider London airport expansion plans and airspace change programmes, all of which will contribute to emissions. As such, the approach taken by the Applicant, as presented, is too singular and presents the best-case scenario. Scenarios should be based on a 'full-spread' of possible emissions and impacts rather than a 'hope for the best' approach. Updated cumulative assessments are needed to factor in the necessary scenarios (Appendix 5.1).
- 6.5 The Applicant has placed too much emphasis on the option of offsetting carbon emissions as opposed to seeking ways to mitigate them on-site. The Carbon Action Plan (Appendix 5.4.2) is unduly light on the commitment to consider and deliver innovative and reasonable solutions. Offsetting should be a 'last resort' mechanism yet, as read, it appears to be considered as the main solution. With such a large-scale project, it is considered that the Applicant has not taken advantage of opportunities to be a pioneer for innovative climate limiting development within the built and natural form of the application area and beyond. This could include design, operations and a wider introduction of sustainable technologies for static structures.

7.0 Heritage

- 7.1 The Applicant argues (APP-032) that it has used a Historic England-commissioned report on how to assess the impact of a change in operational aircraft noise on the setting of heritage assets to undertake its assessments. This uses a noise contour area based on the change in noise from aircraft resulting from the proposed expansion. Within the area where the noise change is above a certain threshold (+1dB Leq16 and +25% N60), the heritage assets are further filtered based on four 'sensitivity' categories A-D.
- 7.2 Within Mole Valley, out of the 90 or so heritage assets within the noise change contour area, only three heritage assets have been highlighted as sensitive to change – two places of worship (Category A) and a windmill (Category B). It is not clear why the increase in noise and visual movement would not be considered to have a greater significant impact on the historic environment of this area.
- 7.3 There are many other listed buildings that fall within the wider envelope that have not been recognised but whose setting would be impacted by the increase in the number of flights. MVDC has previously raised concerns through the pre-application process and observed that buildings had been screened out unnecessarily and were assured the methodology would be looked at. This has not been done and Consultation Report Annex A (APP-219) confirms that no changes have been made as result of comments.
- 7.4 The Council does not agree with the Applicant's interpretation of Historic England's methodology and considers that it should consider the 90 or so heritage assets within Mole Valley district under sensitivity Category D. The Applicant must verify and provide evidence which demonstrates whether Historic England approves of the approach taken and the interpretation of its methodology or seek to carry out the additional heritage assessment works to be robust and transparent.

8.0 Landscape and the Area of Outstanding Natural Beauty (AONB)

- 8.1 It remains unclear whether the Surrey Hills AONB has been suitably considered through the Landscape, Townscape, and Visual Impact Assessment (LTVIA) (APP-033) in terms of the tranquillity assessment. While it is acknowledged that Natural England's review of the Surrey Hills boundary is ongoing, draft amendments are available to the Applicant and have been since March 2023. The Applicant has had sufficient information and time prior to submission to consider this and the Council does not consider there to have been due regard to these changes or the potential impacts.

9.0 Adequacy of Consultation

- 9.1 It is noted that the Examining Authority (ExA) has determined that the Applicant met the basic consultation requirements set by the Planning Act 2008. However, the Council maintains that the failings in terms of public and local authority engagement continue to present obstacles to the application. The Council is of the view that, had the process been carried out more thoroughly, many of the issues raised in this Representation would have been likely to have been resolved.

10.0 Airspace Change Programme (ACP)

- 10.1 Gatwick and Heathrow are undergoing an assessment of their airspace and this forms part of the Future Airspace Strategy Implementation (South) (FASI-S) programme. Heathrow is slightly more advanced in its ACP and has submitted its Stage 2 Initial Options Appraisal to the Civil Aviation Authority (CAA), with implementation scheduled between: 2027-2029. GAL is due to consult on its ACP options in early 2024 with implementation also due to commence in 2027.
- 10.2 The Applicant has suggested that it will be several years before detailed options for its ACP are known (APP-031). This is not accurate. The applicant has also sought to suggest that the DCO can progress without understanding the ACP options further and that it will be through the FASI process that environmental impacts can be addressed. This is a dismissive approach and the FASI process should be considered, where possible, through the DCO. GAL's ACP options development overlaps with the examination of the DCO, with implementation scheduled to take place during the DCO construction phase. However, there has been little or no modelling or sensitivity testing to consider the impacts of the airspace change.
- 10.3 The ACP outputs could result in environmental impacts that are not being accounted for in the DCO. It is acknowledged that FASI-S/ACP will be subject to a separate regulatory process to the DCO, however, there is a degree of uncertainty over how these changes will impact residents of Mole Valley and beyond. FASI-S could reduce the level of impacts at more distant locations but increase them at others yet no regard to this has been made. The Council is concerned that GAL will defer to the Civil Aviation Authority (CAA) when making changes to precise flight paths and has not fully included airspace change within the DCO assessment process (APP-245). In-combination effects are of concern to the Council.

11.0 Transport and Highways

Roads

- 11.1 The Council's representations regarding road matters should be read alongside that of Surrey County Council, as the Highways Authority, which are supported by MVDC.
- 11.2 MVDC is prevented from being able to accept the Applicant's position that there will be little or no adverse impacts on the highway network relevant to wider Mole Valley and the SRN beyond the Longbridge Roundabout (APP-258), due to concerns over the modelling undertaken. As presented, there is a lack of sensitivity testing in the modelling regarding airport capacity and the different levels of uptake for alternative travel methods. There also appears to be more focus on the impacts in the Crawley area which underplays how areas, such as Horley, and Surrey networks will be affected, especially given the multiple routes which can be used to access the M25.
- 11.3 Concerns regarding the works to the Longbridge roundabout are also raised, with particular regard to and how the construction works will be mitigated. In particular, the diversion of pedestrian and cycle access across the roundabout are not considered to be sufficient. The level of disruption should not be underestimated and proper diversions, clear pathways and other public safety measures need to be reconsidered and implemented accordingly. More detail and clarity around mitigation measures should be provided.

Public Transport

- 11.4 The submitted application provides insufficient public transport provision (APP-258) for Mole Valley, especially for the most populated areas in the north of the district in Dorking, Leatherhead and Ashted. The approach to coaches, buses and support for local commuters will not be effective and instead will be of detriment to the wider community and businesses. Further public transport provisions to serve Mole Valley need to be provided and information on funding and agreements with relevant operators shared. It is the Council's view that a notable modal shift to sustainable transport mechanisms is unachievable and not based on realistic or reasonable assumptions and forecasting.
- 11.5 Regarding buses, the proposed frequencies for the enhanced services would be paid for by the Sustainable Transport Fund, which is set out in GAL's current Section 106 Agreement. However, there is insufficient information on whether such funding is actually available. While contributions to the public transport network is welcomed, none of the limited provisions for Mole Valley, would serve beyond the rural south of the district. In terms of coaches, Route 3 via Oxshott is no longer in the NRP and none of the now proposed coach routes would directly serve Mole Valley. The proposals are counterproductive to securing real benefits of public transport and maintaining viability of those services.
- 11.6 For local residents who commute to Gatwick either to work at the airport or to access the train station, the Local Commuter Zone scheme has proven helpful. However, there are no plans to expand the current zone in response to the NRP. In the absence of a comprehensive public transport offer, it stands to reason that there will continue to be a reliance on private vehicles, impacting on the Applicant's commitments to altering modal share. It seems unreasonable to provide insufficient public transport options, while also failing to support those workers and commuters who are forced to travel by car.

- 11.7 Compounding the Council's view that local workers are not being supported by the Application is the lack of provision for 'out of hours' workers and/or those catching early or late flights. While it is acknowledged that there is a limit to when buses and trains can operate more generally, there has been no consideration of whether employee minibuses or pocket park and rides could be of benefit. Once again, for such a large scheme, true opportunities and innovation, which would be in the public benefit, have been ignored.

Rail

- 11.8 The Council considers that rail-based provisions intended to offset the development and serve passengers and commuters are not extensive enough to provide real public and economic benefit. Despite the Applicant's assertions that the planned Gatwick Station upgrades and rail project will provide suitable rail interventions, a large amount of this work relates to improving on site facilities and not necessarily the frequency and efficiency of services. While some increases are planned to take place (2-3 extra peak hour trains and 10 extra off-peak trains per hour), this is scheduled to happen regardless of the NRP and therefore is not a direct result of it.
- 11.9 The Council considers the Applicant to have been short sighted on rail matters and not to have looked at wider strategic opportunities that would reap rewards for the airport. Two key examples are East Croydon Station and Dorking Deepdene.
- 11.10 In the case of East Croydon, the Applicant has acknowledged in its Transport Assessment (APP-258), the significance of the station as part of the rail network. However, it underplays the importance of necessary upgrades to East Croydon Station and the Windmill (Selsdon) Junction, both of which present obstacles to increasing capacity and access into and out of London and the wider Brighton Line via Gatwick. While Paragraph 9.4.22 recognises the additional trains that improvements could bring to Gatwick, it also accurately notes that there is no current funding commitment for the works (paragraph 9.4.21), which have been on Network Rail's future plans for some time, so the works remain undeliverable. Given the acknowledged benefits these upgrades could bring to both the airport and wider local economy, the Council is unclear why the NRP has not sought to support and contribute funding to these works, further offsetting its impact and actually delivering notable rail improvements for the airport.
- 11.11 For Dorking Deepdene, MVDC notes that it is proposed to increase services on the North Downs Line from 1 to 2 trains per hour in the forecast models. However, there is little regard to the station which currently suffers from a deteriorating structure and facilities and poor accessibility issues, all of which, if remedied, would greatly increase rail usage. This opportunity has been overlooked and the Applicant should commit to exploring investment to resolve accessibility issues at Dorking Deepdene and more innovative solutions to relevant stations elsewhere on the feeder network for the airport. GAL is also well placed to widen these conversations with external stakeholders to secure delivery.
- 11.12 Increasing the rail offer has no negative effects on the NRP. Instead, it assists with a securing positive modal shift away from private cars for which GAL is responsible. With these comments in mind and clear issues relating to the validity of rail-based claims, it is necessary for the Applicant to carry out additional modelling which places less reliance on non NRP-

related rail improvements and usage and which more closely reflect what is more likely to happen.

- 11.13 Due to the lack of early and deliverable commitments to modal shift and sustainable transport options, waiting for firmer proposals through the Airport Surface Access Strategy (ASAS) would not be beneficial and conversations regarding all modes of public transport should take place during examination.

Parking

- 11.14 As a general view, the Council does not consider the associated car parking proposals for the NRP to be robust and does not provide sufficient assurance that off-site and illegal parking activities will be lessened. There is a clear need for a detailed Parking Strategy that carefully considers and justifies the car parking requirements in the context of ambitious modal shift targets and surface access matters. The success, availability and costs of car parking will influence any modal shift and the collaborative and timely preparation of a suitable Parking Strategy would be welcomed to ensure detailed discussions on these matters can be explored and resolved.
- 11.15 In addition, the Council would like clarity regarding the calculations for parking spaces as it is not clear how they have been derived having undergone numerous changes since the pre-application process commenced. It would appear that there has been a reduction in proposed spaces from those set out in the Summer 2022 Consultation, yet there is no evidence to justify how and why this has changed. The Applicant must provide additional details, calculations and justifications for this.
- 11.16 MVDC welcomes funding commitments to support local authority enforcement actions in relation to off-airport parking but would like to know the levels of support and specific details on what this funding will and will not apply to. Through the refinement of the S106 and other funding discussions, this can be clarified. However, the Applicant must already have an idea of such costs and so should be able to make these available to local authorities enabling the discussions to commence swiftly.

12.0 Water

- 12.1 The Council's comments regarding water and flooding should be read alongside those of Surrey County Council Lead Local Flood Authority, which are supported by MVDC.
- 12.2 In addition, the Council wishes to highlight that local officers have observed the water level just a few inches below the bridge soffit at Longbridge Roundabout, where there is a culmination of water sources from the River Mole, the Gatwick stream and a discharge canal. The Applicant has suggested that the peak flow rate at this location, pre and post construction, will remain the same but that the discharge will be for a longer period of time and therefore unlikely to overwhelm the bridge. However, concerns are raised that this will only stand if there is no obstruction to the flow within the watercourse downstream of this area. The Council requests more clarity on how potential obstructions will be prevented or mitigated.

13.0 Conclusion

13.1 In summary, the Council considers there are significant flaws and omissions in the Applicant's case and submitted documentation. It considers that the Northern Runway Project (NRP) will result in a number of significant negative impacts upon the natural and built environments and that the communities that live and work in the local area will likely be adversely affected by the development. The mitigations proposed do not appropriately alleviate these impacts and, until concerns can be allayed, the Council maintains the view that a single-runway, two-terminal airport is the most appropriate arrangement. The Council hopes that these shortcomings will be investigated during the course of the examination.