

SURREY COUNTY COUNCIL – RELEVANT REPRESENTATION OCTOBER 2023

GATWICK AIRPORT NORTHERN RUNWAY PROJECT

PINS Reference: - TR020005

1 Introduction

- 1.1 This representation sets out Surrey County Council's (SCC) main areas of concern with the Northern Runway Project (NRP) and is intended as a summary which will be further developed in subsequent submissions and the Statement of Common Ground. Many of these comments have been made by SCC in its response to Gatwick Airport Limited's (GAL) statutory consultations and through pre-application engagement.
- 1.2 SCC has worked collaboratively with the other host and neighbouring authorities and has commissioned consultancy support in areas where technical expertise is not available in-house or where additional resource is required.

2 Airport capacity, demand and controls

2.1 SCC considers that:

- a) The level of increase in capacity attainable from the project has been overstated by Gatwick Airport Limited (GAL).
- b) Because of the overstatement of capacity attainable, the demand forecasts, which are derived 'bottom up' based on assumptions as to how available capacity might be used, are overstated.
- c) The methodology by which these demand forecasts have been derived is not robust, even if the underpinning assumptions as to the capacity attainable with two runways in use were correct.
- d) Because the forecasts are overstated, this may create conditions where, in practice, critical mitigation triggers are not reached. This is particularly the case in relation to the Noise Envelope, where the limit size of the noise contour has been set too large and so provides no effective control or incentive to reduce noise levels at the Airport.
- e) Given concerns about the level of growth assumed by GAL and by attempting to accommodate such growth, the NRP includes additional car parking spaces and enhancements to the highways network that might not be required.
- f) As a result of capacity overstatement, it also means the economic benefits are overstated.
- g) Unlike other airport expansion schemes, there is no attempt to consider environmental impacts holistically. As part of its DCO application, Luton Airport has proposed a Green Controlled Growth approach, which places controls on four key categories of environmental effect: air quality, greenhouse gas emissions, aircraft noise and surface access. If any limit is breached, further growth will be stopped, mitigation will be required and ultimately, airport capacity would be constrained until environmental performance returns below the limits. No comparable approach is proposed by GAL.

2.2 SCC wishes to see the development of an environmentally managed growth approach by GAL. SCC also requests a full exploration of capacity and demand issues, including a review of the scale of supporting infrastructure required, during the examination.

3 Traffic and Transport

Assessment methodology, assumptions and limitations of the assessment

Modelling suite

3.1 SCC is concerned that the modelling tools adopted cannot be considered accurate enough to provide confidence in their outputs, questions whether it is likely that GAL will be able to meet their Surface Access Commitments (SAC) [APP-090] and therefore whether the Environmental Statement (ES) has thoroughly assessed all the potential impacts. Specifically, SCC's concerns relate to the following points:

- a) The highway model has introduced a tiered approach to calibration and validation standards, yet the tolerances applied to calibration/validation have not been applied to impact assessments.
- b) The public transport model validation over-estimates public transport demand in Greater London and the South East and does so significantly for the county of Surrey.
- c) The lack of interaction between the highway and public transport models may mean that future year bus and coach travel will not reflect delays associated with traffic growth over time and that may result in over-estimated demand for these modes.
- d) The realism test results for car fuel costs, which are higher than TAG criteria, and may result in a greater shift away from car than might otherwise be expected.

3.2 SCC would like to see sensitivity test information in respect to the issues raised above, as well as in relation to the age of the model data (2016), the impact of Covid using DfT tests, and other stress tests such as the impact of realistic minimum and maximum car access/parking charges.

Micro-simulation model

3.3 SCC is concerned that the extent of the VISSIM model includes only one junction in Surrey's network (Longbridge Roundabout), but its extent should be much larger. The model appears to be skewed towards the Crawley area, yet based on the distribution of airport traffic [APP-258 Diagram 12.3.2] the Horley area should feature more heavily.

3.4 SCC would like to see the microsimulation study area increased to cover more of its network. This will enable detailed investigation of the impact of the NRP on its local road network to be understood.

Baseline environment

3.5 SCC has concerns that high levels of background traffic on the Strategic Road Network (M25), which is demonstrated as being at capacity in 2029 in the westbound direction in the morning peak and in the eastbound direction in the evening peak [Table 148 of [APP-260](#)], will increase traffic on the local road network both directly and indirectly as non-airport traffic re-routes off the Strategic Road Network (SRN) onto SCC's network. Given these conditions on the SRN, SCC has concerns that more impacts on its highway network have not been identified.

3.6 SCC wishes to understand the volumes of traffic transferred on to its network either directly to/from the airport or displaced from the SRN on to its network and what the impacts of this traffic would be.

3.7 SCC is concerned that the baseline includes the 2,500 additional parking spaces via robotics at the South Terminal long stay parking area, even though it is yet to be agreed whether this would count as permitted development as it has not been trialled yet.

3.8 SCC wishes to understand the implications if the 2,500 parking spaces are not permitted development - in particular, whether the associated highway infrastructure proposed would still be appropriate in such a case, and that the DCO should not provide permission for these spaces if they are not allowed under permitted development.

Mitigation and enhancement measures adopted as part of the project

3.9 SCC is concerned that the following elements of the surface access interventions which form part of the SAC [Para 54 of [APP-258](#)] remain unspecified:

- a) Financial support for enhanced regional express bus or coach services and local bus services.
- b) Funding to support local authorities in implementing additional parking controls or in enforcement action against unauthorised off-airport passenger parking sites.
- c) Charges for car parking and forecourt access to influence passenger travel choices.
- d) Introducing measures to discourage single-occupancy private vehicle use by staff, incentivise active travel use and increase staff public transport discounts.
- e) Use of the Sustainable Transport Fund to support sustainable transport initiatives.
- f) Provision of a Transport Mitigation Fund to support additional measures should these be needed as a result of growth related to the Airport.

3.10 SCC wishes to understand the details behind these promises, such as the typical parking and access charge, size of Sustainable Transport Fund and Transport Mitigation Fund to provide confidence that the measures can and will be delivered.

- 3.11 SCC notes that a heavy reliance is placed on charges for car parking and forecourt access (see above) and also for rail projects to deliver surface access commitments. However, there are no new rail proposals associated with the project, just 2-3 extra peak hour trains and 10 extra off-peak trains per hour that are planned to happen regardless of the project. This places a heavy burden on these schemes/new services to deliver the SAC.
- 3.12 SCC would like to see sensitivity tests that assume less ambitious delivery of increased rail services to the airport and to understand what GAL is prepared to do to ensure that this is a minimum level of rail service to the airport.**
- 3.13 SCC is concerned that the bus and coach services seem to be under-played: they fail to meet the target in GAL's 2014 Airport Surface Access Strategy for a Second Runway (R2 ASAS) and there is no indication of the willingness of operators to provide these services or advise if others may be required. That bus and coach mode share is a fraction of that achieved at Stansted, which was 20% in 2019, adds to the concern that the SAC are heavily reliant on proposed (but not additional) rail services and charges for car parking and forecourt access.
- 3.14 SCC would like to see further evidence of GAL's engagement with bus and coach operators and understand GAL's commitment to delivering improved bus and coach access and increased contribution to passenger and staff mode share.**
- 3.15 Feedback provided by SCC in February 2023 (GAL NRP DCO Review of Highways Design Strategy Report_v1) does not appear to have been satisfactorily actioned with regard to the highway and active travel infrastructure proposals, while a review of the submitted material associated with the DCO application has identified further queries and concerns. While GAL has now provided further explanation in response to this feedback via their consultants Arup on 5th October 2023, SCC considers that many of the concerns and issues raised are still outstanding.
- 3.16 In particular, SCC has previously highlighted concerns with the active travel route being promoted via Longbridge Roundabout as it is not the most direct route and incorporates sections of shared use on bridges that are being widened in any case; users are thus twice compromised. SCC highlighted that these concerns would be lessened if the more direct route between Gatwick and Horley via the new signalised crossing of A23 London Road and Riverside Garden Park was provided for pedestrians and cyclists. SCC has also expressed concern with the decision not to improve links over the Brighton Mainline for cyclists.

3.17 Based on the DCO proposals, SCC considers that the active travel infrastructure proposed is unsatisfactory, especially considering the ambitious sustainable mode share targets set [it is noted that section 8.6.16 of the Transport Assessment APP-258] states *“The model outputs also indicate that around 9% to 10% of staff journeys made to and from locations within 8km of the airport, compared to the target of 15% for such journeys.* Thus, improvement to the more direct route between Gatwick and Horley via the new signalised crossing of A23 London Road and Riverside Garden Park to provide for pedestrians and cyclists, as well as cycle links over the Brighton mainline, is considered by SCC to be vital if GAL are to achieve their sustainable mode share targets set.

3.18 The scheme has not fully explored how further improvements to the Rights of Way network around the airport could increase opportunities for sustainable travel from surrounding residential areas such as Charlwood, Hookwood and Povey Cross.

3.19 SCC requires:

- **Plans to be provided or conditioned that are detailed enough to judge design compliance and that cover all the proposed improvements, with acceptance of the design also conditioned accordingly; and**
- **GAL to revise the highway and active travel infrastructure proposals to address the issues raised.**

Assessment of effects

3.20 SCC has already outlined concerns about the performance of the models used, the extent of models used and the low level of impacts reported. Until these have been addressed, SCC cannot comment on the assessment of effects.

3.21 SCC would like to see concerns about the modelling tools to be addressed before the assessment of effects can be agreed.

Surface access commitments

3.22 SCC is concerned that GAL appears to have proposed a less ambitious sustainable transport mode share target than previous documents aimed for and that efforts to meet them in a business-as-usual scenario seem to have been neglected.

3.23 In GAL's [Second Decade of Change](#) (2023), it is reported that *“By 2030, Gatwick aims to achieve 60% passenger and staff travel to the airport by public transport and zero and ultra-low emissions journey modes.”* This 60% target applies to both passengers and staff separately, with the following detailed targets:

- 52% of passenger journeys by public transport by 2030, with remaining journeys by zero and ultra-low emission modes; and
- 48% of staff journeys by public transport, shared travel and active travel by 2030; with remaining journeys by zero and ultra-low emission modes.

3.24 However, data provided in Tables 8.6.2 (landside passenger two-way rail demand and mode share) and 8.6.3 (landside passenger two-way bus/coach demand and mode share) of the Transport Assessment [APP-258] paint a different picture. The data shows that, in 2029, the 24hr future baseline for public transport mode share (comprising rail mode share (42%) and bus/coach mode share (7%)) would be 49%. The 24hr future baseline for public transport mode share with the Project (comprising rail mode share (43%) and bus/coach mode share (8%)) would be 51%. (The council acknowledges that the latter figure would be 52% by 2032). Targets for staff are also missed.

3.25 SCC would like to understand (i) why the targets in the Second Decade of Change published in the same year as the Draft DCO application, are now just aspirations and not consistent with SAC and (ii) what will be required to meet those targets in both the future baseline and scheme scenarios in specific years.

3.26 SCC would like GAL to propose an alternative set of commitments that follow the principle of environmentally managed growth, such as those being pursued by Luton Airport in their DCO application. These commitments would prevent growth until interim surface access commitments had been met and thus ensure that sustainable travel was at the heart of Gatwick's growth, rather than a target after growth.

Securing mitigation

3.27 SCC is concerned that the highway-based mitigation, secured through this DCO, is planned to commence as soon as the airside works have been completed rather than establishing whether they would be required at that time if the SAC were met or exceeded. That the first Annual Monitoring Report (AMR) will be produced no later than six months before the commencement of dual runway operations provides the opportunity for evidenced based growth to occur.

3.28 SCC wishes to see mitigation that leads to sustainable travel delivered upon commencement of works and that additional highway capacity and parking capacity is not commenced until SAC are met.

3.29 SCC is concerned that as set out in the SAC [para 6.2.4 of APP-090] *“if the AMR shows that the mode share commitments have not been met or, in GAL's reasonable opinion, suggests they may not be met (having regard to any circumstances beyond GAL's control which may be responsible)”*, GAL has the opportunity to prepare an action plan for the next two years to address any shortfall but that there does not appear to be any sanction if the SACs are not met by that time.

3.30 SCC wishes to see growth delivered in a sustainable way, so that the SAC are met before further growth in passenger and staff numbers is allowed.

Construction impact

3.31 SCC is concerned about the impact of construction of the SAC on its road network. In particular:

- a) Section 15 of the Transport Assessment [\[APP-258\]](#) identifies a high impact on Longbridge Roundabout for 6 months during highway construction, yet no mitigation is proposed.
- b) For the A23 Longbridge reconstruction, it appears that the south side utility bridge won't be used for pedestrians and the alternative route would be to use the north footway and then go anticlockwise around the whole roundabout. A widened utility bridge for pedestrians etc. would need to be considered in the scheme boundary extent. A controlled pedestrian crossing may need to be considered north/east of the Longbridge Roundabout if users are expected to use the north footway.
- c) GAL will need to engage with SCC regarding consideration of Lane Rental schemes as well as the Permit scheme within the DCO as Surrey and West Sussex County Councils have commenced operation of Lane Rental Schemes under Section 74a of New Roads and Street Works Act 1991.
- d) SCC requests confirmation that the A23 temporary panel bridge will be suitable for Special Type General Order vehicles as this does serve as a primary route into Horley.
- e) Replacement of the Balcombe Road overbridge will most likely close the road below it to pedestrians for a period with a temporary tunnel underneath to protect pedestrians. Therefore, SCC requests further details regarding reconstruction of the Balcombe Road bridge as this has not been indicated previously.

3.32 SCC wishes to see mitigation during the Longbridge Roundabout construction, A23 reconstruction and Balcombe Road Bridge installation. GAL also needs to engage with SCC regarding consideration of Lane Rental schemes as well as inclusion of Permit Scheme provisions within the DCO.

Construction Workforce Travel Plan and Traffic Management Plan

3.33 SCC acknowledges the high-level measures, promotion and monitoring proposed in the Outline Construction Workforce Travel Plan but as these are high level with nothing confirmed, a Full Construction Workforce Travel Plan will be needed for SCC to be able to agree to these.

3.34 Previous information indicated that Longbridge Roundabout would form part of the main construction routing, however it now appears that construction routing for the other compounds beyond South Terminal (Airside, MA1, Car Park B, Car Park Y, Car Park Z,) will use the North Terminal Roundabout for access.

3.35 SCC requests confirmation that Longbridge Roundabout is only needed for access to the Longbridge Roundabout compound.

Construction Compounds/Accesses

3.36 The entrance to the Longbridge Roundabout compound is not defined. Therefore, SCC seeks confirmation of this.

3.37 SCC is concerned that separate entrances to the South Terminal compound are proposed for HGVs (from the roundabout) and private vehicles (from Balcombe Road). This has not been discussed previously as access was anticipated from the roundabout. SCC is concerned about the impact on Balcombe Road and the local road network. As local workers should be travelling by sustainable modes, this implies that the workers using this access will be from further afield, yet Balcombe Road is not directly linked to the SRN as the roundabout is. This implies that an extended journey on the local road network is required. **Therefore, SCC wishes to see all access to the South Terminal compound from the South Terminal Roundabout.**

Traffic and transport conclusion

3.38 A recurring theme of these traffic and transport comments is that of certainty of outcome. The evidence presented is based on assumptions contained within models. There are queries around capacity and demand within the airport forecasts and this leads to SCC concerns as to whether all the proposed highway infrastructure and additional parking spaces are required.

3.39 SCC has demonstrated that there are elements of the models that have higher degrees of uncertainty than usual (the tiered high validation) and other modelling elements that could have a higher propensity to deliver public transport mode share than may otherwise be the case. Furthermore, SCC is not aware of the levels of parking and access charge that will be required to deliver the mode share levels published, and whilst the values used in the model are presented, these are not benchmarked. It is hard therefore for SCC to be sure that the measures proposed will be sufficient for the SACs to be met and that the assessment of impacts and effects is robust.

3.40 SCC has also requested information regarding the plans and schedules of the DCO; receipt of which could reduce other uncertainties.

3.41 To reduce uncertainty, SCC request that GAL change its approach to growth and, like Luton Airport's proposals, pursue a sustainable growth agenda which is constrained until Surface Access Commitments have been met. As an approach, it delivers the same outcomes as that which is proposed, but delivers them ahead of growth, not retrospectively. It will add incentive to the action plans that would be delivered should the AMR show that the SAC have not been met.

4 Noise

4.1 Queries remain in relation to air, ground (including construction), airport related road traffic and other airport related noise. Residents have particular concerns around night noise disturbance, which we would like to see addressed. Improved information is required to enable residents to understand noise impact more easily. As an example, receptors newly experiencing noise levels exceeding the Significant Observed Adverse Effect Level (SOAEL) are not identified.

Noise Envelope

4.2 Key issues for the council include:

- a) The Noise Envelope design process did not follow best practice guidance set out in CAP1129 or good practice from other airports. SCC would have expected local authorities and stakeholder groups to have been involved in the envelope design from the outset and prior to the statutory consultation in September 2021, with the process of examining all noise envelope options, metrics and limits from a first principles basis. The Civil Aviation Authority (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.
- b) It must be demonstrated how the noise benefits of future aircraft technology are shared between the airport and local communities, as required in the Aviation Policy Framework.
- c) Use of annual noise contour limits in addition to noise limits covering the 92-day summer period, would provide confidence that noise would be controlled outside the 92-day summer period.
- d) The Noise Envelope should provide certainty about the levels of noise which can be expected in the future in accordance with CAP 1129; however, the Noise Envelope allows for noise contour limits to increase as a result of airspace changes and new aircraft technology. There should be no allowance for noise contour area limits to increase as a result of these factors.
- e) There is no mechanism for local authorities to review Noise Envelope reporting, enforce limit breaches or review any aspects of the Noise Envelope.
- f) Thresholds should be adopted into the Noise Envelope with the intention that action can be implemented prior to a contour limit breach occurring.
- g) The Noise Envelope thresholds are not agreed. It is not appropriate to use the slow-transition case to define noise contour limits. There is no incentive to push the transition of the fleet to quieter aircraft technology.
- h) Capacity declaration restrictions are a weak form of noise control as new slots within that capacity can be allocated. Slot restriction measures should be adopted.
- i) The DCO should provide for 5 yearly (or more frequent) reviews of the Noise Envelope. A first review of the contour 9 years after opening or when 382,000 Air Traffic Movements is achieved provides limited incentive for GAL to achieve a faster fleet transition and secure noise benefits.
- j) 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.

4.3 SCC considers there are substantial deficiencies in the Noise Envelope that need to be addressed before it could be considered fit for purpose. The proposed monitoring, review and enforcement of the Noise Envelope is not agreed. SCC would like to see an environmentally managed approach to implementation and enforcement.

Noise insulation scheme

4.4 Key issues for the council include:

- a) The air noise insulation scheme is only based on average L_{eq} contours rather than single mode contours and is confined to L_{eq} metrics.
- b) There are concerns about the noise level at which the different schemes start.
- c) A lack of measures to prevent overheating in noise insulated homes especially in the summer months at night.
- d) There appears to be no provision for the ongoing maintenance / replacement costs of the noise insulation with this cost simply passed to the owner.
- e) Residents in the Outer Zone should be offered more flexibility in the type of insulation rather than being restricted to ventilation.
- f) The noise insulation scheme should extend to community buildings such as care homes, places of worship, village halls, hospitals.
- g) It is not clear if properties that have already received insulation would be eligible for upgraded noise insulation as part of the new scheme.
- h) No details are provided on how monitoring of ground noise would be undertaken and how a property would be identified as appropriate for monitoring ground noise.

4.5 SCC requests that improvements are made to the noise insulation scheme and that the points mentioned in a) to h) above should be addressed satisfactorily.

5 Carbon and Climate Change

5.1 The council's concerns include:

- a) The Greenhouse Gas (GHG) Assessment fails to consider the risks of the Jet Zero Aviation Policy and how this could compromise the UK's net zero trajectory in alignment with the concerns raised to the UK Government by the Climate Change Committee.
- b) It is not clear if the impact of changes to the Emissions Trading System (ETS)/CORSIA has been considered in aviation forecasts used to develop the needs case for expansion.
- c) The GHG Assessment does not assess the cumulative impact of the project in the context of eight biggest UK airports planning to increase to approximately 150 million more passengers a year by 2050 relative to 2019 levels.
- d) The GHG Assessment is non-compliant with the GHG Protocol Corporate Accounting Standard and GHG accounting best practice, with potentially not all emission sources included.
- e) The climate impact statements documented in ES Chapter 15: Climate Change [APP-040] and Appendix 15.8.1 Climate Change Resilience Assessment [APP-187] lack consistency in the way they are articulated in that some are missing an 'impact'. This result is what should determine the consequence rating and could arguably have led to an underestimation of risk.

- f) The lack of identification of additional mitigation / adaptation measures is a key omission from the Climate Change Resilience Assessment [APP-187] and the Urban Heat Island Assessment [APP-186]. Whilst GAL may not have assessed any of the risks as 'significant', the identification of further adaptation measures that can increase asset resilience should be noted, especially considering the potential underestimation of risk detailed above.

5.2 SCC requests that further information is provided in these key areas and that there is a full exploration of carbon and climate change considerations during the examination.

6 Drainage and impact on Lead Local Flood Authority

6.1 The council's concerns include:

- a) The draft DCO does not include any protective provisions for the county councils, as Lead Local Flood Authorities, in respect of ordinary watercourses.
- b) Revisions are required to the Code of Construction Practice (COCP) Annex 1 Water Management Plan [APP-083].
- c) The limited reference to sustainable drainage in the proposals, including a lack of reference to non-statutory technical standards for sustainable drainage or SCC guidance for sustainable drainage.
- d) Clarity is required about climate change allowances used in relation to the water environment.

6.2 SCC requires protective provisions to be added to the DCO and revisions to the CoCP. Clarification is required on the points raised.

7 Impact on Landscape, Environment and Biodiversity

Biodiversity

7.1 The council's concerns include:

- a) The Biodiversity Net Gain (BNG) assessment does not follow standard practice as the baseline BNG value of the site should include all habitats within the DCO application boundary.
- b) It is not clear how much woodland and other habitats are being lost as the ES chapter does not clearly quantify the amount of loss or compensation.
- c) Additional compensation is required for the mature woodland loss, especially given the lag time for newly planted woodland to mature and reach target condition.
- d) Bat roost surveys of trees have not been undertaken.
- e) There is a lack of information on reptile and Great Crested Newt receptor sites and mitigation strategies.
- f) There is no compensation provided for loss of ponds.
- g) A landscape scale approach should have been taken to addressing ecological impacts, including the need for providing off site compensatory habitat and BNG.

- h) Further opportunities for biodiversity enhancement within the site should have been explored. For example, the conversion of 'amenity grassland' on road verges and roundabouts to wildflower grassland, and the improved management of Gatwick Stream.
- i) Enhancements to green corridors and improved habitat connectivity should extend beyond the confines of the airport, along key corridors such as the River Mole and Gatwick Stream, to mitigate impacts on bats and other wildlife.
- j) Need for evidence of security of long-term positive management of the two existing biodiversity areas managed by GAL, the North West Zone (NWZ) and Land East of the Railway Line (LERL).
- k) Clarification is required on the legal mechanism for the management and maintenance of Longbridge Roundabout Mitigation area (Gatwick Dairy Farm).
- l) Engagement is required on the Gatwick Greenspace Partnership proposals. Specifically, greater detail is needed about the level of contribution to the partnership and the priorities for biodiversity enhancement.

7.2 SCC requires the BNG metric to be provided in Excel format to aid review. Additional information is requested for a number of areas and requests are also made for additional biodiversity enhancement.

Landscape and Visual Impact

7.3 SCC's issues include:

- a) The approach to and judgements within the Landscape and Visual Impact Assessment especially in relation to:
 - the tranquillity assessment including its extent.
 - assessment of landscape value and sensitivity in relation to undesignated landscapes such as those not in close proximity to the airport; the judgement around significance of effects on landscape character and features including in relation to those judged to have 'moderate' levels.
 - The number of viewpoints, especially in relation to mid and far distant views, or changes to layouts; the approach to the visual baseline assessment, and the approach to sensitivity, magnitude and significance.
 - The quality of visual assessment presentation in relation to the wire-frame images, the issue of accuracy and completeness.
- b) The loss of or change in existing green infrastructure, including potential loss of important or historic hedgerows and existing greenspace.
- c) Approach to mitigation and compensation for all adverse landscape and visual effects including consideration of strategic green infrastructure in and around the airport.
- d) Consideration of the potential changes to the Surrey Hills AONB boundary

7.4 SCC wishes to see a full exploration of landscape and visual impact issues during the examination.

8 Public Health, including Air Quality

8.1 The council agrees with the air quality concerns that are being raised by the Surrey district and borough Environmental Health Officers. Given SCC's public health role, the council has particular concern about:

- a) Residents' exposure to ultrafine particles (UFP) and the fact that the health impact assessment of UFP appears to understate the potential impact.
- b) The separation of construction and operational assessments over the period 2029 to 2032 is likely to result in an underestimation of the 'true' pollutant concentrations experienced by residents during this period.
- c) The lack of any plans to undertake long term residential real time monitoring of UFP, both number and size distribution, using equipment used on the UK national network.
- d) Whether the full cumulative impacts of the construction and operation phases on the physical and mental well-being of vulnerable group populations have been considered. Parts of Horley and Charlwood will be affected by both construction and operation of the project. The neighbourhood of Horley Central and South includes one of the most deprived Lower Layer Super Output Areas in Surrey and SCC wishes to see further evidence that cumulative impacts for vulnerable group populations have been fully assessed.

Noise concerns have been detailed separately.

8.2 SCC wishes to see further exploration of cumulative health impacts and identification of any resulting need for further mitigation and to reiterate district and borough requests for the local authority real time (NOx, PM, ozone) and diffusion tube monitoring to be funded (revenue and capital replacement costs) to 2047 or 389,000 movements.

9 Employment and Skills and Socio economic

9.1 There remains uncertainty as to how Surrey's residents will benefit and insufficient detail as to how economic benefits for Surrey's residents will be secured and delivered.

9.2 Key concerns include:

- a) The Employment and Skills Business Strategy (ESBS) is generic, lacking detail and clarity and does not provide sufficient detail on, amongst other things, local baseline; tailored local initiatives aligning with local needs and priorities; outputs; measurable targets, details of funding and approach to monitoring.
- b) GAL's Education Engagement Strategy targets age groups aged 5 – 24 and wider families. GAL should also consider offering new training courses that recognise the upskilling needs of an adult population. Adults returning to work will need a more tailored offer.
- c) The wider economic benefits of the project have been overstated due to the failure to adequately distinguish the demand that could be met at Gatwick from the demand which could only be met at Heathrow and the economic value that is specific to

operations at Heathrow. The methodology by which the wider catalytic impacts in the local area has been assessed is not robust.

- d) Several of the baseline data sources are out of date which is a concern given the reliance on these sources to inform the various assessments.
- e) The need to revisit the approach to estimating construction employment and forecasting availability of temporary accommodation given the reliance on old data and not accounting for local variations.
- f) The need to revisit sensitivity and magnitude gradings for several assessments in the socio-economic chapter.
- g) The assessment of socio-economic effects has been undertaken at different geographical levels but has not assessed impacts at a local authority level. This is despite ongoing issues concerning labour supply, housing (including affordable) and temporary accommodation in the local authorities located close to the project. As a result of this approach, the assessment does not identify specific impacts on these areas.
- h) The assessment of housing and population relies on out-of-date data and should be using up-to-date information given it will impact on labour supply/housing conclusions. The assessment also makes optimistic projections on housing and doesn't appear to fully consider existing constraints.
- i) There is no commitment to the financial value of the Gatwick Community Fund and detail on the method of distribution has not been discussed with local authorities.

9.3 Clarification and further work are required in a number of areas. SCC also requires further engagement around the ESBS and expects to see it supported by a draft implementation plan with named partners and a timeline supporting the delivery of the activities. Local authority input into the principles of the Gatwick Community Fund is also needed.

10 Draft Development Consent Order

10.1 The council has wide-ranging concerns about the dDCO. Detailed comments will be shared with the applicant in due course. A summary of the council's main concerns (which is not exhaustive) is set out below –

- a) the definition of “commencement” and, in particular, the implications arising from certain operations which fall outside that definition and which do not appear to be controlled (article 2(1), interpretation);
- b) the drafting of article 3 (development consent etc. granted by Order);
- c) the drafting of article 9 (planning permission) and confirmation regarding which planning permission and conditions the applicant is concerned about;
- d) the disapplication of several provisions of the New Roads and Street Works Act 1991 without the application of the relevant highway authority's permit scheme (article 10; application of the 1991 Act);
- e) the way in which street works are controlled under article 11 (street works);

- f) the inclusion of deeming provisions in articles 12(4) (power to alter layout, etc. of streets), article 14(8) (temporary closure of streets), 18(10) (traffic regulations), 22(5) (discharge of water), and 24(6) (authority to survey and investigate the land);
- g) the standard to which alternative routes must be provided under article 14(5) (temporary closure of streets);
- h) the proposal to allow the applicant to create new means of access without the street authority's consent under article 16 (access to works);
- i) how the "instrument" referred to in article 18(6)(a)(traffic regulations) will be accessed;
- j) the need for highway authorities to agree template agreements before the end of the Examination with the applicant under article 21 (agreements with highway authorities);
- k) the need for Protective Provisions for the Lead Local Flood Authority in respect of Ordinary Watercourses
- l) the time limit for exercising compulsory purchase powers under article 31 (time limit for exercise of authority to acquire land compulsorily);
- m) the timing of the vesting of special category land in the applicant under article 40 (special category land);
- n) the inclusion of Work Nos. 26, 27, 28 and 29 (which all concern hotels) in Schedule 1 (authorised development);
- o) the drafting of several requirements (Schedule 2) including: the drafting of "start date" (R.3(2) (time limits and notifications); the 14-day notification period in R3(2); why some documents must be produced "in accordance with" the certified documents and others must be produced either "in general accordance" or "in substantial accordance" with them; the drafting of R.14 (archaeological remains); and of those which concern noise (e.g. R.15 (air noise envelope), R.18 (noise insulation scheme)); the ambiguous drafting and omissions in R.19 (airport operations);
- p) the 8-week deadline in Schedule 11 (procedure for approvals, consents and appeals) for determining significant applications (e.g. the waste recycling facility).
- q) Amendment of DCO Schedules (and associated plans) to address inconsistencies and errors

10.2 SCC wishes to see issues with the DCO resolved and requires further information as to when the proposed section 106 agreement will come forward and when negotiations will begin in earnest.

11 Conclusion

11.1 In line with SCC's Full Council resolution on airport expansion, SCC remains of the view that expansion requires the accompanying environmental and surface access issues to be satisfactorily addressed. The points raised in this representation highlight the serious deficiencies in this regard.